

## INFORMATION ON THE PROCESSING OF PERSONAL DATA PURSUANT TO ARTICLES 13 AND 14 OF (EU) REGULATION 2016/679

Dear Company/User,

Protecting the privacy of users is important to us at Redabissi. We guarantee compliance with the regulations on the protection of personal data. We therefore provide the following information on the processing of personal data collected from Customers using our Platform called "RedHab".

Redabissi may collect personal data directly from the concerned person or from third parties - e.g. in the case of the integration of customer information systems (e.g. Customer Relationship Management [CRM] or business management systems of the customer company)

### 1. Data controller

RedAbissi S.r.l. (hereinafter also referred to as "RedAbissi" or "Controller"), a company incorporated under Italian laws with registered office in 10124 - Turin, Corso Vittorio Emanuele II n° 44, Tax code and VAT n° IT12009950010, is the Controller of the data processing, hereby represented by its *pro tempore* legal managing director.

As the data controller of the personal data collected when browsing the various sections and subsections of the [www.redabissi.com](http://www.redabissi.com) website for the provision and performance of its services, RedAbissi undertakes to ensure compliance with the regulations on privacy, as amended by the European Union Regulation n° 679/2016 (hereinafter, "GDPR"), providing its customers with all the relevant information both on how the aforementioned data is collected, stored and used and on the rights of each user.

For any information and/or further clarification, you may contact RedAbissi, in its capacity as data controller and data protection officer, by writing to: [info@RedAbissi.com](mailto:info@RedAbissi.com) or [RedAbissi@pec.it](mailto:RedAbissi@pec.it).

### 2. Personal data processed, purpose and legal basis for processing.

#### A. Personal data processed

In order to provide the requested services and to continuously improve the user experience of the RedHab Platform, RedAbissi will process the following data:

- Additional personal data (company name, business form, telephone number, invoicing address, VAT number as well as any other useful and/or necessary data required by the legislation applicable from time to time) provided by RedAbissi users and necessary to complete any fiscal and administrative fulfilment, as required by the applicable legislation;
- Common data of company contact persons of customers (e.g. name, surname, fixed and mobile telephone, mobile phone);
- Common data of directors of sole proprietorships or professionals necessary for the establishment of the relationship;
- Common data and information provided by visitors/users of the website [www.redabissi.com](http://www.redabissi.com) and its sub-domains and/or domains in any way connected, present and future, generated by access to the site. The computer systems and software procedures set up by RedAbissi acquire the information sent to the user's browser and, in particular: (i) the IP address, (ii) the type of operating system and browser used, (iii) the settings, date and time of use as well as (iv) the location (understood as the user's geo-location) and language used;
- Common personal data, which cannot be defined a priori, generated, communicated or uploaded by users to the Platform in connection with the use of the service (such as, but not limited to, messages, posts, comments, pages, profiles, images, communications exchanged on the supported platforms, etc.);
- information sent voluntarily by users such as, but not limited to, questions to RedAbissi's customer support, comments on services provided by RedAbissi, answers to surveys and/or other optional information such as links to social network profiles authenticated, from time to time, through the use of their RedAbissi account.

#### B. Purpose and legal basis of processing

The personal data requested by RedAbissi are collected and processed for the following purposes:

1. for the activation of any "demo" or "test" access to the RedHab Platform; in relation to this purpose, the processing of data is carried out on the basis of the performance of a contract to which the data subject is a party or the performance of pre-contractual measures taken at his or her request (Art. 6.1(b) of the Regulation);
2. to provide the services requested and to continually improve the experience of using the RedHab Platform; this also includes accounting, assistance on contracted products or services and, in general, the fulfilment of any customer requests and the management of interactions that occur in the context of the contractual or commercial

relationship; in relation to this purpose, the processing of data is carried out on the basis of the performance of a contract to which the data subject is party or the execution of pre-contractual measures taken at the request of the same (art. 6.1 lett. b) of the Regulation;

3. to request the user to evaluate the individual experience of use of the RedHab Platform or more generally for "customer satisfaction" and "customer experience" surveys; In relation to this purpose, the processing of data is carried out on the basis of the legitimate interest of the Data Controller (Art. 6.1 lett. f) of the Regulation, attributable in particular to the need to improve the services offered to customers, with particular regard to after-sales management.
4. for accounting, tax, administrative purposes as well as for the fulfilment of legal obligations or in the event that the processing of the aforementioned data is necessary in order to comply with requests made by judicial authorities and/or public authorities within the scope of judicial and/or administrative proceedings and for which there is an obligation to communicate the aforementioned data; in relation to this purpose, the data processing is carried out on the basis of the performance of a contract to which the data subject is party or the performance of pre-contractual measures adopted at the latter's request (Art. 6.1 lett. b) as well as for compliance with legal obligations (Art. 6.1 lett. c) of the Regulation;
5. for the legal defence of one's right or interest before any competent authority or body, including expressly for the purpose of debt recovery; in relation to this purpose, the processing of the data is carried out on the basis of the legitimate interest of the Controller (Art. 6.1(f) of the Regulation.
6. in the presence of specific consent from the user (art. 6.1 lett. a) for the periodic sending to registered users of the RedHab Platform only, by email and/or their RedAbissi account, of newsletters/s and/or commercial and technical communications from the Controller;

The additional data (such as, but not limited to, domain names, IP addresses and/or browser types), collected through the RedAbissi website, are and/or will be used for the purposes of monitoring the stability and security of the RedHab Platform and are and/or will not in any way be supplemented with any additional personal information that is not strictly necessary for the purposes specified therein.

### **3. Nature of the supply of data**

The provision of personal data is essential for the use of the services and for the activation of the user profile(s) on the RedHab Platform. Any refusal on the part of the user to provide his/her data will make it impossible for RedAbissi to provide and perform its services, without this giving rise to any kind of breach of contract on the part of RedAbissi. Any refusal by the user to grant consent does not affect the possibility to use the services of RedAbissi and has no effect other than to exclude the sending of newsletters/s and/or advertising material.

### **4. Methods of Data Processing**

The data collected will be processed through the use of electronic, computerised and telematic automated tools and/or through manual processing with logic strictly related to the purposes for which the personal data have been collected, guaranteeing, in any case, their security.

The aforementioned data will be stored on computer media, in compliance with the security measures and safeguards suggested by the GDPR.

All data is stored using RedAbissi's server farm which is located in a state-of-the-art, highly secure data centre and in any case in line with legal requirements. In order to prevent the misuse of such data, RedAbissi takes certain specific security measures such as, for example, storing confidential data in an encrypted format.

The Master Data Processing Agreement ("MDPA"), describes the conditions and modalities of the processing of personal data performed by RedAbissi and the responsibilities related to the processing activities, including the commitment made as a Data Processor pursuant to Article 28 GDPR.

### **5. Categories of recipients of personal data**

Personal data processed by Redabissi can be accessed by users at any time through the RedHab Platform. For the sole purposes indicated in the information notice, the data may be made accessible to:

- internal staff of RedAbissi S.r.l., identified for this purpose and authorised to process the data according to specific instructions given in compliance with the regulations in force;
- third parties (e.g. professional firms and/or external consultants) carrying out assistance and consultancy activities on behalf of RedAbissi, in their capacity as external data processors, only for the purposes strictly necessary for processing the same;
- companies that perform services related and instrumental to the performance of the above purposes, such as, but not limited to, cloud storage service companies, payment management companies, credit institutions, management platforms, CRM platforms and for the electronic management of marketing communications.

- to law firms we trust for the possible protection of our rights or for the management of disputes relating to the Contract;
- to judicial bodies, arbitration panels, mediation bodies and their mediators, party counsels, in the event of litigation
- to judicial or supervisory authorities, administrations, public bodies and organisations (domestic and foreign);

The up-to-date list of such persons may be requested from the Data Controller, in the manner indicated in the following paragraph.

## 6. Duration of the processing

The processing shall last no longer than is necessary for the purposes for which the data were collected and, in any case, may vary in relation to the choices made by the user with reference to the contractual agreements entered into from time to time with RedAbissi.

The user may, at any time, request the interruption, limitation and/or cancellation of data by sending a request to: [info@RedAbissi.com](mailto:info@RedAbissi.com). In this case, the provisions of Article 3 above shall apply.

## 7. Transfer of data

The management and storage of personal data will take place on servers owned by RedAbissi and/or third-party companies specifically appointed by RedAbissi and duly appointed as data processors. Said servers will be located outside the territory of the European Union.

RedAbissi's current cloud provider is **Netalia S.r.l.**, operating in Italy. The provider has complied with the ISO 9001, ISO 27001, ISO27017, ISO27018 standards as well as the privacy criteria imposed by the GDPR, as can be found at the following address: <https://www.netalia.it/conformita/>

The personal data provided by the user to enable the sending of (i) commercial communications by email about products, initiatives and/or services offered by RedAbissi and/or (ii) newsletters containing in-depth information are processed electronically through the use of the Platform of the company called The Rocket Science Group LLC operating under the name "Mailchimp". The transfer of only the data necessary to send the aforementioned communications (first name, last name, user email address) shall take place by adopting appropriate safeguards in accordance with standard contractual clauses adopted by the European Commission in its Implementing Decision (EU) 2021/91 of 4 June 2021.

### 7.1 Third-party apps and social networks

The Service enables an ecosystem in which you can choose to connect with supported platforms. If you choose to submit your content to a supported platform, RedAbissi is no longer responsible for that content from the moment you leave the Service. Instead, your content will be under the control of the terms and privacy policies of the supported platforms. For example, if you use the Service to post a message on Facebook, Facebook's privacy policy and terms of service will apply to that message on Facebook's server. While we attempt to facilitate access only to supported platforms that share our respect for your privacy, we cannot take responsibility for the content or privacy policies of any supported platform. We encourage you to carefully review the privacy policies of any supported platform that you access through the Service. For reference:

- <https://www.facebook.com/policy.php>
- <https://help.instagram.com/402411646841720>
- <https://www.linkedin.com/legal/privacy-policy>
- <http://www.google.com/policies/privacy>
- 

### 7.2 Revocation of access to supported platforms

The Service relies on its connections to supported Platforms and their APIs (such as the Facebook API, the Instagram API, the LinkedIn API, etc.). This is how to proceed if you do not want the Service to access the data of social profiles previously connected to the Service:

- For Google: <https://security.google.com/settings/security/permissions>
- For Facebook: <https://www.facebook.com/help/204306713029340>
- For Instagram: <https://www.facebook.com/help/204306713029340>
- For LinkedIn: <https://www.linkedin.com/help/linkedin/answer/a519947/third-party-applications-data-use?lang=en>
- 

## 8. Rights of the data subject

Each user, in his or her capacity as a "Data Subject", in accordance with the provisions of Chapter III, Section I, GDPR, you may exercise the rights set out therein, and in particular

- Right of access - To receive confirmation as to whether or not personal data relating to you are being processed and, if so, to obtain information relating, in particular, to: the purposes of the processing, the categories of personal data processed, the period of storage, the recipients to whom the data may be disclosed (Article 15, GDPR);
- Right of rectification - Obtain, without undue delay, the rectification of inaccurate personal data concerning you and the integration of incomplete personal data (Article 16, GDPR);
- Right to erasure - Request, without undue delay, the erasure of personal data concerning you, in the cases provided for by the GDPR (Article 17, GDPR);
- Right of restriction - Impose restrictions on processing on the co-owners, in the hypotheses established by the GDPR (Article 18, GDPR);
- Right to data portability - To receive, in a structured, commonly used and machine-readable format, your personal data provided to the Data Controller or the Joint Data Controller, as well as to obtain that they be transmitted to another data controller without hindrance, in the cases provided for by the GDPR (Article 20, GDPR);
- Right to object - Object to the processing of personal data relating to you, unless there are legitimate grounds for the Controller and/or Joint Controller to continue the processing (Article 21, GDPR);
- Right to complain to the supervisory authority - Complain to the Data Protection Authority (Information and contact details at [www.garanteprivacy.it](http://www.garanteprivacy.it)). The complaint form can be downloaded via this [link](#).
- 

#### **9. Procedures for the exercise of rights.**

As mentioned above, the user has, at any time, the possibility to object to the processing of their data and/or request the deletion, modification or updating of all personal information held by RedAbissi.

These rights may be exercised by the user by sending a communication to the following e-mail address: [help@redabissi.com](mailto:help@redabissi.com) or via PEC by writing to [redabissi@pec.it](mailto:redabissi@pec.it).

#### **10. Minors**

The RedAbissi website, as well as the services offered therein, are not intended for persons under the age of 18. For this reason, RedAbissi will not intentionally collect, use or disclose personal data referring to persons under the age of 18.

In the event that information on minors is unintentionally recorded, including as a result of misrepresentation on the part of users, RedAbissi will provide for its prompt deletion at the request of users and/or, in any event, as soon as it becomes aware of the reason for the deletion.