



INFORMATION ON THE PROCESSING OF PERSONAL DATA

Customer Information Form REV. 01 of 11/10/2024

With this information we wish to inform you about the processing of personal data provided by you, in compliance with the applicable legislation on the protection of personal data. The information is provided pursuant to articles 13 and 14 of the European Regulation on data protection (hereinafter also “**GDPR**”) and the Italian legislation in the sector (hereinafter, collectively, both, the “**Applicable Legislation**”).

This information may be subject to changes and/or additions and/or updates, also as a consequence of the update of the applicable legislation on the protection of personal data .

1. DATA CONTROLLER .

The Data Controller is the company **EU WINGS SRL** , with registered office in Via Osteria Grande, 59 – 37066 Sommacampagna (VR), CF and VAT number 03891450276, REA VR-377569, hereinafter also “Data Controller” or simply “Controller”.

For any clarification, information, exercise of the rights listed in this Policy, you can contact the Data Controller at the following addresses: tel. +390452522902 , e-mail: privacy@euwings.it , PEC: euwings@legalmail.it.

2. PURPOSE OF DATA PROCESSING.

The Data Controller collects and processes customer data and personal identification and contact data, including bank details and references, of natural persons who operate in the name and on behalf of the customer and/or in his interest (hereinafter, respectively, the “**Data**” and the “**Interested Parties**”). Below we indicate the purposes of the processing, the legal basis that legitimises the processing and the retention period of your personal data.

| PURPOSE | LEGAL BASIS | CONSERVATION |
|---|--|--|
| Contract execution : to conclude a contract and fulfill contractual and pre-contractual obligations, such as economic-financial assessment, request for documentation certifying possession of certain requirements, fulfillment of specific requests prior to the conclusion of the contract, ordinary management of the contract, customer support and after-sales assistance. | Execution of pre-contractual and contractual obligations (art. 6, par. 1 letter B, GDPR) | The data will be retained for the period of ordinary prescription of rights for accounting and/or tax reasons, except for the further retention period provided for by law or, in the event of litigation, until its conclusion. |
| Compliance with legal obligations : to comply with obligations arising from laws, regulations and/or provisions issued by authorities authorised to do so or by supervisory and control bodies. | Compliance with legal obligations (art. 6, par. 1 letter C, GDPR) | |



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|---|---|---|
| <p>Improving service quality : to verify that the service complies with the standards offered and intervene to improve it .</p> | <p>Legitimate interest (art. 6, par. 1 letter F, GDPR)</p> | <p>Until the end of the contract.</p> |
| <p>IT security and anti-fraud controls : to carry out control activities and monitor IT services and prevent fraudulent or illegal activities.</p> | <p>Legitimate interest (art. 6, par. 1 letter F, GDPR)</p> | <p>For two years at most.</p> |
| <p>Exercise of the right of defense : to protect one's rights in all appropriate judicial and extrajudicial venues.</p> | <p>Legitimate interest (art. 6, par. 1 letter F, GDPR)</p> | <p>Until the end of the dispute and the expiry of the term for appealing the decisions, in any case no later than the expiry of the limitation periods provided by the law for the exercise of rights .</p> |
| <p>Promotion of similar products or services : to allow the Owner to promote and directly sell products or services similar to those you have already purchased, using the email address you provided in the context of a previous purchase, provided that you do not exercise the right to object in the ways described in the following paragraphs. You may exercise the right to object via the appropriate link at the bottom of any promotional email that will be sent to you .</p> | <p>Legitimate interest (art. 6, par. 1 letter F, GDPR and art. 130, paragraph 4, Legislative Decree 196/2003)</p> | <p>The Data may be stored for a period equal to the Data collected for contractual purposes, without prejudice to the right of the interested party, at the time of collection and at any time, to oppose the processing.</p> |
| <p>Direct Marketing Activities : to allow the Data Controller to carry out, on its own initiative, without a specific request from you, marketing and promotional activities, such as: advertising and promotional information, direct sales, carrying out market research, surveys aimed at assessing the level of customer satisfaction (<i>customer satisfaction</i>), commercial communications, newsletters and periodic publications, carried out on the initiative of the Data Controller, via e-mail, SMS, instant messaging systems (e.g. WhatsApp) and telephone calls with an operator , for products and/or services offered by the Data Controller.</p> | <p>Consent (art. 6, par. 1 letter A, GDPR)</p> | <p>Personal data may be stored for 5 years from the last interaction, or until the moment of revocation of consent by you, which may occur at any time.</p> |
| <p>Transmission of data to third parties (group/subsidiary companies) for marketing purposes : to allow group and/or subsidiary</p> | <p>Consent (art. 6, par. 1 letter A, GDPR)</p> | <p>Personal data may be stored for 5 years from the last interaction , or until the moment of</p> |

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| companies to carry out marketing and promotional activities relating to their services. | | revocation of consent by you, which may occur at any time. |
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What is the legitimate interest that allows the processing?

With regard to the legitimate interest for the purposes of "Improvement of the quality of service", the legitimate interest corresponds to the need to offer an ever-improving service in line with the customer's expectations; for the purpose of "IT security and anti-fraud controls", to avoid abusive and illicit use of the system; for the purpose of "Exercise of the right of defense", to protect the rights and exercise rights recognized by law, including debt collection and does not prejudice the freedoms and fundamental rights of the interested party. In the case of "Promotion of similar products or services", the legitimate interest is attributable to the desire of the Owner to continue commercial relations with the customer, improve their service and send updates on developments of the offer.

3. DATA PROCESSING METHODS.

The Data will be processed using both manual and computerised tools (such as, for example, company IT devices, internet, management software, company email, etc.) with methods and tools suitable for guaranteeing maximum security.

The treatments will be based on the principles of correctness, lawfulness, transparency, necessity and in order to protect the confidentiality of the Data.

The Owner has adopted specific security measures to prevent the loss of personal data, illicit or incorrect use and unauthorized access.

The Data is not subject to any automated decision-making process.

4. RECIPIENTS OF PERSONAL DATA.

The processing is carried out by the Data Controller's personnel specifically authorised by virtue of their respective duties, as well as by the Data Processors specifically identified in writing, within the scope of their respective functions and in accordance with the instructions given by the Data Controller, ensuring the use of suitable measures for the security of the data processed and guaranteeing their confidentiality. The list of Data Processors is available upon request.

Furthermore, the Data may be communicated to the following categories of recipients:

- a) subjects, entities or authorities to whom, as independent data controllers, it is mandatory to communicate the Data by virtue of provisions of law and/or orders of the authorities;
- b) credit institutions, finance companies, credit insurance companies and other credit intermediaries that provide services functional to the purposes described above;
- c) software support companies, cloud and IT service providers;
- d) with prior consent, group companies and/or subsidiaries for marketing purposes;
- e) entities performing supervisory functions or certification bodies, where necessary;
- f) companies or professionals for the judicial or extrajudicial protection of the rights of the Owner.

5. TRANSFER OF DATA TO THIRD COUNTRIES OR INTERNATIONAL ORGANIZATIONS .

To pursue the purposes described in this policy, the Data may be transferred outside the European Economic Area. In such cases, the Data Controller ensures that any transfer will take place in accordance with the provisions of Chapter V of the GDPR. In particular, in the case of transfers to countries that do not ensure an

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appropriate level of protection, the Data Controller undertakes to adopt one of the adequate guarantees pursuant to the GDPR and the provisions of the competent Authorities. Further information is available from the Data Controller by making a request to the contact details indicated above.

6. NATURE OF DATA PROVISION.

The provision of Data is necessary to fulfill legal and contractual obligations and, therefore, any refusal to provide them in whole or in part may result in the impossibility for the Owner to execute the contract.

The provision of data for Marketing Purposes is purely optional and subject to the consent of the interested party: if you do not intend to provide data for this purpose, the commercial and/or promotional initiatives of the Data Controller will not be communicated.

7. RIGHTS OF THE INTERESTED PARTY.

We inform you that in your capacity as interested party, you have the right to revoke any consent granted, as well as to exercise the rights listed below, which you may assert by making a specific request to the Data Controller at the address above:

- Right of Access: the interested party, pursuant to art. 15, has the right to obtain confirmation that personal data concerning him or her is being processed and, where applicable, to obtain a copy. He or she also has the right to obtain access to the personal data concerning him or her and to further information such as the purpose of the processing, the categories of recipients, the period for which the data will be stored and the rights that can be exercised.
- Right of rectification: the interested party, pursuant to art. 16, has the right to obtain the rectification of inaccurate personal data concerning him or her or their integration.
- Right to erasure: the interested party has the right to obtain the erasure of personal data concerning him, without unjustified delay, if one of the reasons provided for by art. 17 exists.
- Right to limit processing: the interested party has the right, in the cases provided for by art. 18 of Regulation 2016/679, to obtain the limitation of processing.
- Right to data portability: the interested party has the right to receive in a structured, commonly used and machine-readable format, the personal data concerning him or her and has the right to transmit such data to another owner without impediment, as provided for by art. 20 of Regulation 2016/679.
- Right to object to processing: the interested party has the right to object to the processing of personal data concerning him/her as provided for by art. 21 of Regulation 2016/679.
- In the case of consent-based processing, the right to withdraw consent at any time without prejudice to the lawfulness of the processing carried out before the withdrawal. The consent given for marketing purposes includes both automated methods (e-mail, SMS and instant messaging) and traditional contact methods (telephone calls with an operator) indicated in the information. The possibility for the interested party to withdraw any consent given even partially, or with reference to certain contact methods and not to others, remains intact .
- Right to lodge a complaint with the Data Protection Authority, Piazza Venezia n. 11, 00187, Rome (RM).

We remind you that, if you should find anomalies or violations regarding the processing of your personal data, you have the right to contact the Guarantor for the protection of personal data <http://www.garanteprivacy.it>.



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CONSENT:

I, the undersigned _____, born in _____, on _____, resident in _____

- I AGREE
- I DO NOT AGREE

that my contact details are used by the Data Controller for marketing purposes via email, SMS, instant messaging systems (e.g. WhatsApp) and telephone calls with an operator.

- I AGREE
- I DO NOT AGREE

that my contact details are transmitted by the owner to third parties (group companies and/or subsidiaries) for marketing purposes.