

INFORMATION ON THE PROCESSING OF PERSONAL DATA IN ACCORDANCE WITH ARTICLES 13 AND 14 OF (EU) REGULATION 2016/679 (“GDPR”)

Below, IRIDEOS S.p.a. provides information concerning the processing of personal data (“Data”) relating to its clients (albeit potential), third-party subjects representing them (legal representatives, delegates, representatives, etc.) and those who provide their Data by accessing the www.irideos.it website, the other websites of our group and our newsletters.

ABOUT US

The data controller is IRIDEOS S.p.a., with registered office in Milan, Vial Bodio, 37. You can reach us at gdpr@irideos.it for matters concerning the protection of your Data.

HOW WE COLLECT DATA

We collect Data from subjects through our call centers and with other contact methods such as, for example, our websites and apps for mobile devices such as tablets and smartphones.

We collect Data also through third-party subjects including our business partners, marketing and market research companies and financial risk centers.

Finally, we can collect Data from public sources such as freely-accessible registers, lists and documents (e.g., financial statements or company registration reports) as well as from sources including paper or digital newspapers, telephone directories, websites of public bodies and supervisory and control authorities.

THE DATA WE PROCESS

We process your Data to supply electronic communication services and other services as well as complementary and accessory products. They include mainly:

- personal information (i.e. name, surname, birth date), tax code, vat number, address of residence and/or domicile and phone number and/or e-mail address;
- - personal data, tax code, VAT number, address of residence and/or domicile, telephone numbers, e-mail addresses of the subjects you have appointed to have commercial relations with our Company;
- phone and internet traffic data;
- bank and/or payment data (i.e. IBAN and SWIFT code);
- data concerning the solvency and punctuality of payments, purchases also made through the information systems of authorized companies providing services for the management of credit risk and fraud prevention;
- data concerning consumption habits and/or Client interests;
- particular data pursuant to art. 9 of the GDPR, if collected for the activation of specific services (also in favor of specific categories of interested subjects such as the visually or hearing impaired);
- judicial data, processed to perform compulsory justice services.



PURPOSES OF PROCESSING

PURPOSE OF PROCESSING	LEGAL BASIS
<p>Requests for information and subscription to the newsletter</p> <p>Data are processed in relation with the access to the www.irideos.it website and the other websites we administer and in relation with the subscription to our newsletter providing you with the information you request and keeping you updated on the latest innovations in the field of electronic communications and on our offers.</p>	<p>Processing is necessary for the purposes mentioned in the adjacent column. Providing your Data is optional. Any refusal to provide them may result in the non-functioning of the tools mentioned in the adjacent column.</p>
<p>Signing and execution of the contract</p> <p>Data are processed to register you, perform pre-contractual activities and execute the contractual relationship and resulting activities such as the provision of our services, their invoicing and the management of payments, the provision of assistance services, access to available benefits and/or incentives, the handling of complaints and reports to the customer service, the sending of communications and any other activity deriving from the contractual relationship.</p>	<p>Processing is necessary to perform pre-contractual activities and execute the contract subscribed with our Company. Refusal to provide the Data may lead to the impossibility of conducting the contractual relationship with our Company and provide the services you requested.</p>
<p>Compliance with legal obligations</p> <p>The Data collected are processed to comply with the administration, accounting and fiscal obligations our Company is subjected to, exercise the rights of defense out of court and/or in court and/or during arbitration proceedings and comply with the measures issued by the judicial authorities aimed at the prevention and suppression of offences.</p>	<p>Processing is necessary to enable our Company to comply with the legal obligations it is subjected to, exercise the rights of defense out of court and/or in court and/or during arbitration proceedings and comply with any measures issued by the judicial authorities and other supervisory authorities.</p>
<p>Payment Services and verification of the degree of reliability and punctuality of payments from possible parties and clients and fraud prevention.</p>	<p>The processing is based on the legitimate interest of our Company to use payment verification services, carry out credit check and fraud prevention activities. You have the right to object at any time to this processing in case of special situations that concern you.</p>



Performance of marketing activities by sending commercial communications relating to services and/or products similar to those in your contract.

The Data are processed to send you e-mail alerts and commercial offers on products and/or services similar to those provided under the existing contractual relationship.

Performance of customer satisfaction surveys services

The Data are processed to conduct customer satisfaction surveys by submitting specific forms in order to improve the quality of the services provided.

Processing of Data for marketing purposes

The processing of general information, data relating to contact information and consumption habits is carried out, also through our commercial partners, to perform market research and send you communications on the services and products we commercialize through automated (e.g., SMS, e-mail, push notifications etc.) and/or traditional (operator calls, post, etc.) communication channels.

Processing of Data for profiling purposes

The processing of general information, data relating to contact information and consumption habits and/or client interests is performed to carry out analyses - automated and/or manual - to identify preferences, choices and client consumption habits in order to improve our services and products and make targeted commercial offers.

Aggregate data profiling

Processing for the purposes of aggregate profiling of traffic data is carried out to improve the services provided by the Company and related technologies.

Processing is based on the legitimate interest our Company has in sending commercial communications to our clients as mentioned in the adjacent column. You have the right to oppose this processing at any time in case of specific situations that concern you.

Processing is based on our Company's legitimate interest to perform activities to improve the quality of our services. You have the right to object at any time to this processing in case of special situations that concern you.

Processing is based on the consent you provide before relevant operations, which you may withdraw at any time by sending a standard e-mail to gdpr@irideos.it. Any refusal to provide consent or a subsequent withdrawal of the consent will not have adverse effects on you.

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The treatment is based on the legitimate interest of our Company to carry out the activities of updating and development of its services. You have the right to object at any time to this processing in case of special situations that concern you.



THIRD-PARTY SUBJECTS WE CAN COMMUNICATE DATA TO

In order to execute the contract, comply with legal obligations and pursue our legitimate interests, we have the faculty to communicate the personal data collected to the following subject categories:

- legal entities and/or individuals who perform data processing and processing services for the purpose of marketing our services and products;
- banking and financial institutions and other payment service providers, and for credit risk management and fraud prevention;
- companies and/or individuals carrying out market researches and customer satisfaction surveys;
- companies and/or individuals managing our information systems for the performance of our economic activities;
- companies and/or individuals providing technical and organizational services;
- companies and/or individuals providing data entry, storage and Data management services;
- companies and/or individuals performing direct and indirect customer care activities;
- companies and/or individuals performing control, revision and certification functions of the activities carried out by our Company;
- companies and/or individuals performing consulting activities for our Company;
- commercial and/or sales agents and brokers;
- other electronic communications operators, for the management of interconnection and roaming relations;
- companies and/or individuals who are assignees of the debt and debt collection companies/institutions;
- companies and/or individuals performing transmission, enveloping, transport and distribution activities to the Clients;
- our parent companies, subsidiaries and associated companies;
- judicial and independent authorities, on the basis of orders issued pursuant to the current legislation.

With the exception of the competent judicial and independent authorities, the above-mentioned subjects shall process the personal data acquired as data controllers or joint controllers or processors on our behalf.

Your data may also be disclosed to our employees, interns, temporary workers and consultants specifically authorized to carry out their processing, but will not in any way be disseminated and/or made available to unknown subjects.



HOW WE PROCESS DATA

Your Data are collected, processed and stored in a lawful manner and for the purposes indicated above, manually and using electronic and/or automated means so as to guarantee their security and confidentiality.

WHERE WE PROCESS DATA

Your Data are stored in archives located in countries within the European Union.

If necessary to pursue the purposes illustrated above, they may be transferred abroad to countries and/or organizations outside the European Union that guarantee a level of personal data protection considered suitable by the European Commission or based on other suitable guarantees such as, for example, the standard contractual clauses adopted by the European Commission or the provision of your consent.



DATA PROCESSING DURATION

Your Data will be retained in a form that enables your identification for a period of time that does not exceed that necessary for the purpose for which they were collected and pursuant to the provisions regulating the electronic communications sector. Afterwards, they will be deleted or made anonymous, without prejudice to their retention to comply with the obligations that apply after the contract is terminated and to comply with the orders issued by judicial authorities and/or regulatory and supervisory bodies.

The specific time limits for the retention of the main Data processing operations are listed below:

Pre-contractual activities	up to 24 months after the Data are collected
Compliance with legal obligations	up to 10 years after the services/products cease to be provided
Administrative, accounting and fiscal purposes	up to 10 years after the services/products cease to be provided
Storage of phone and/or internet traffic data for offence investigation and suppression purposes	12/24/72 months, according to specific law provisions
Verification of the grade of financial reliability, solvency and fraud prevention	for the duration of the Contract
Offence investigation and suppression purposes	12/24/72 months, according to specific law provisions
Storage of phone and/or internet traffic data for service invoicing purposes	up to 6 months, unless extended to manage any disputes
Marketing purposes	until consent is withdrawn or 24 months after the termination of the contractual relationship
Profiling for marketing purposes	until consent is withdrawn or 24 months after the termination of the contractual relationship
Aggregate profiling of traffic data	24 months after the termination of the contractual relationship



YOUR RIGHTS

In accordance with the GDPR, you have the right to:

- access your Data to obtain information concerning their existence, processing purposes, the recipients or recipient categories your Data are or will be communicated to, Data retention limit;
- ask and obtain the modification and/or adjustment of any Data you consider inaccurate and/or incomplete;
- ask and obtain the cancellation and/or restricted processing of your Data if the data or information are not necessary for the execution of the contract, the pursuit of a legitimate interest for our Company and/or the compliance with legal obligations;
- oppose at any moment the processing of your Data, including profiling, in accordance with art. 21 of the GDPR;
- ask and obtain your Data - in a structured and commonly used format readable by automatic devices - for their portability to another controller.

You may exercise said rights either directly or through a representative by sending a standard e-mail togdpr@irideos.it.

We will comply with requests within the terms set out in art. 12, paragraph 3 of the GDPR.

Pursuant to the regulations in force, you may lodge a complaint concerning the processing of your Data to the Authority for the protection of personal data as well as bring proceedings before a court in line with articles 78 and 79 of the GDPR.

DATA PROTECTION OFFICER

We have duly appointed a Data Protection Officer, domiciled at our registered office, who can be contacted at rpd@irideos.it.

