

# PRIVACY POLICY

*pursuant to applicable data protection legislation*

Dear Customers, Alexide S.r.l. hereby wishes to inform you on how your personal data are handled and processed, and which measures are adopted to keep your information safe. We will also try to answer the most common questions regarding privacy.

## 1. WHAT ARE PERSONAL DATA?

Any information regarding an identified or identifiable natural person. By way of example, a person's name, surname, telephone number and e-mail address are personal data.

## 2. WHO WILL HANDLE PERSONAL DATA?

The personal data regarding Alexide's customers are processed by the company in its capacity as Data Controller. Alexide S.r.l. has its registered office in Via Cristoforo Roda 85, 47522 Cesena (FC); you can contact us at [info@alexide.it](mailto:info@alexide.it). As Data Controller, Alexide determines the means of the processing, retention and protection of personal data, in compliance with Regulation (EU) 2016/679 (so-called GDPR) regarding personal data protection, as well as with legislative decree 196/2003 as subsequently updated and amended.

## 3. FOR WHAT PURPOSES ARE PERSONAL DATA PROCESSED?

Your personal data are processed in order to execute the service supplied to the Customer, related to software development and/or technical support and maintenance service on software products developed by ALEXIDE. Among others, the following processing operations fall under this category:

- collection of personal data and/or contact details;
- collection of billing information;
- entry of personal data and/or contact details, as well as billing information, in the management system and electronic billing software/invoice storage, used by Alexide;
- sending of billing information to the accountant to comply with tax and accounting legal obligations.

## 4. WHAT ARE THE LEGAL BASIS FOR THE PROCESSING OF PERSONAL DATA?

Any processing of personal data must find justification in a suitable legal basis that makes it legitimate. The specific legal bases in relation to the processing carried out by ALEXIDE are set out below.

Purposes of the processing	Legal basis for the processing of personal data
Collection of personal data and/or contact details	<ul style="list-style-type: none"><li>Performance of pre-contractual measures upon request of the Customer deciding to directly reach out to Alexide;</li><li>Performance of a contract to which the Customer is party by virtue of the Customer's confirmation of the commercial offer.</li></ul>
Activation of Products' License In case the Customer decides to activate software apps owned by Alexide, which licenses them	<ul style="list-style-type: none"><li>Performance of the contract, since the processing is necessary to activate the license in case the final user requests it (also through a Retailer).</li></ul>
Collection of billing information	<ul style="list-style-type: none"><li>Performance of a contract to which the Customer is party;</li><li>Compliance with an accounting legal obligation to which the Controller is subject.</li></ul>

*Privacy policy of the Data Controller ALEXIDE S.r.l.*

### Alexide srl

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Data entry in the management system and in the electronic billing software/invoice storage	<ul style="list-style-type: none"> <li>• Performance of a contract to which the Customer is party;</li> <li>• Compliance with an accounting legal obligation to which the Controller is subject.</li> </ul>
Sending of billing information to accountant	<ul style="list-style-type: none"> <li>• Compliance with a tax and accounting legal obligation to which the Controller is subject.</li> </ul>
Assistance and maintenance. By virtue of its expertise, Alexide also offers an assistance and maintenance service related to the apps and/or software developed by Alexide itself. In such circumstance, Alexide acts as external Processor.	<ul style="list-style-type: none"> <li>• Performance of contractual obligations set out in a specific maintenance agreement and appointment as Data Processor</li> </ul>
Newsletter "Alert" to inform customers via e-mail about updates or product developments, or to report bugs.	<ul style="list-style-type: none"> <li>• Controller's legitimate interest.</li> </ul>
Newsletter business format to advertise new products or updates, or to highlight promotions to Prospects.	<ul style="list-style-type: none"> <li>• Data subject's consent.</li> </ul>
Video-surveillance Alexide S.r.l. implemented a video-surveillance system at the company's premises, with the purpose to keep safe and protect the corporate asset.	<ul style="list-style-type: none"> <li>• Controller's legitimate interest for safety and protection of the corporate asset purposes.</li> </ul>

## 5. FOR HOW LONG WILL THE DATA BE RETAINED?

Customers' data will be retained for the period necessary to achieve the purposes described above.

More particularly, personal data, contact details and billing information will be deleted 10 years after termination of their processing, in compliance with legal provisions (art. 2220 of the Italian Civil Code regarding accounting bookkeeping). In case of exercise of the right of defense, data will be retained until the contractual liability period expires. The newsletter will be sent to prospects and customers until they express their willingness to unsubscribe (opt-out), or for 36 months after their last active action. Finally, video-surveillance recorded images and videos will be deleted within 72 hours after the recording.

## 6. WHO ARE THE PROCESSED DATA DISCLOSED TO?

Customers' data may be disclosed to:

**STAFF IN CHARGE OF PROCESSING:** means employees or internal contractors of the Controller, who collect and process your data by virtue of their respective duties and according to the responsibilities attributed to each of them.

**DATA PROCESSORS:** means third parties which process personal data on behalf of ALEXIDE, through the execution of a specific data processing agreement, which the processor's responsibilities are set forth, as well as the security measures that the processor must take to best protect the data received from ALEXIDE.

In particular, ALEXIDE has executed a data processing agreement with the following processors:

- E-mail provider, which has adhered to the standard contractual clauses as adequacy measures for extra-EU data flows;
- Our in-house management system used by employees, whose servers are located at Microsoft Azure (as regards the so-called External Portal, which is also visible to Customers), which has also adhered to the same standard contractual clauses, while the Internal Portal, with data visible only internally, has protected data centers allocated in-house.
- Productivity providers such as Microsoft Office and video conferencing services such as Microsoft Teams, as internal collaborative tools or communication tools with Customers;
- The company in charge of handling back-up procedures, with data centers located in Switzerland;
- Electronic billing software;
- Third-party professionals, such as accountant and payroll company.

**RECIPIENTS:** means those to which the personal data are disclosed by the Controller, who act as autonomous Controllers after said disclosure. Among others: banks or other credit institutions; insurance companies for any events involving liability; judicial and/or public security authorities, under the circumstances expressly provided by the law.

## 7. WHAT ARE THE DATA SUBJECTS' RIGHTS?

Customers will always have the right to obtain from Alexide confirmation as to whether or not their personal data are being processed and, if so, to obtain access to such personal data, but also their rectification or erasure. Customers shall also have the right to object, on grounds relating to their particular situation, at any time to processing of personal data concerning them which is based on point (e) or (f) of Article 6(1) of the GDPR.

Finally, customers have the opportunity to lodge a complaint with the supervisory authority "*Garante per la Protezione dei Dati Personali*".