

Introduction

This privacy notice is provided pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (the “GDPR”) and Italian Legislative Decree No. 196 of 30 June 2003, as amended by Italian Legislative Decree No. 101 of 10 August 2018 (the “Privacy Code”), by Airbank S.r.l., in its capacity as Data Controller, i.e. the entity that determines the purposes and means of the processing of personal data.

The purpose of this notice is to provide, in a clear and transparent manner, all information concerning the characteristics and methods of the processing of personal data carried out by Airbank S.r.l. in relation to persons who interact with the company through online and offline channels, namely:

- users who visit the website www.airbank.it and use the services available there (such as contact forms, the newsletter, the restricted area, etc.);
- customers and suppliers, including prospective customers and suppliers, who have contractual or pre-contractual relationships with Airbank;
- applicants who submit an application through the “Work with Us” section or through other channels.

All of the persons referred to above are hereinafter defined as “Data Subjects”.

Data Controller

Airbank S.r.l., with registered office at Via Luigi Bay, 29121 Piacenza (PC), Italy, Italian tax code and VAT number 01536470337, represented by its legal representative pro tempore (hereinafter, the “**Controller**”).

Categories of Personal Data Processed

During interactions with the Controller, both online and offline, different categories of personal data relating to Data Subjects may be processed, depending on the purpose pursued.

- **Data provided directly by Data Subjects:** these data are collected voluntarily, for example by completing online forms, sending emails, registering on the website, submitting job applications, or in the context of contractual and pre-contractual relationships. They include:
 - **Personal and identification data:** first name, surname, company name, tax code, VAT number, etc.;
 - **Contact details:** email address, telephone number, postal address, certified email address (PEC);
 - **Registration data and credentials:** username, password, order history (restricted area);
 - **Contractual and administrative data:** data relating to orders, purchases, shipments, invoicing and payments; -
 - CV data:** information contained in a curriculum vitae (education, work experience, etc.).
- **Data collected automatically when using the website:** when Data Subjects visit www.airbank.it, the Controller automatically collects certain technical information, including:
 - **Browsing data:** IP address, browser type, access time, pages visited, referring URL;
 - **Data collected through cookies and tracking technologies:** device identifiers, browsing preferences, aggregated statistical data, etc. These data are processed in accordance with the principles of lawfulness, fairness, transparency and data minimisation, and as described in the Cookie Policy.

Purposes of Processing, Legal Bases, Nature of Provision and Retention Periods Data

Subjects’ personal data may be processed for the following purposes:

- **Website navigation and use of its features**
 - **Purpose of processing:** to ensure the proper display and use of the website, maintain system security, prevent misuse, and produce anonymous and aggregated statistics on the use of the website pages.
 - **Legal basis:** performance of a contract or steps taken at the request of the Data Subject prior to entering into a contract (Article 6(1)(b) GDPR), and the Controller's legitimate interest in the security and improvement of the website (Article 6(1)(f) GDPR).
 - **Nature of provision:** mandatory; failure to provide the data prevents proper use of the website.
 - **Retention period:** technical data are retained for no longer than is strictly necessary to provide the service and ensure the security of the website.

- **Technical management and security of the website**
 - **Purpose of processing:** to ensure the security and integrity of IT systems and corporate networks, prevent unauthorised access, fraudulent activities and unlawful use of the website, and detect technical anomalies or malware.
 - **Legal basis:** the Controller's legitimate interest in protecting its IT infrastructure and preventing unlawful activities (Article 6(1)(f) GDPR).
 - **Nature of provision:** mandatory, as it is necessary to access the website securely.
 - **Retention period:** the data will be retained for the time necessary to achieve the relevant purpose and, in any event, no longer than necessary for security purposes or to establish liability in the event of incidents.

- **Website registration and access to the restricted area**
 - **Purpose of processing:** to enable the creation of a personal account, access to the restricted area, and the management of the account and related communications.
 - **Legal basis:** performance of a contract or steps taken at the request of the Data Subject prior to entering into a contract (Article 6(1)(b) GDPR).
 - **Nature of provision:** mandatory; failure to provide the data prevents registration and access to the restricted area.
 - **Retention period:** the data will be retained until the account is deactivated or the service is discontinued.

- **Management of contractual relationships with customers and suppliers**
 - **Purpose of processing:** to establish, manage and perform contractual or pre-contractual relationships, including orders, supplies, support services, and administrative and accounting activities.
 - **Legal basis:** performance of a contract or steps taken at the request of the Data Subject prior to entering into a contract (Article 6(1)(b) GDPR).
 - **Nature of provision:** mandatory; failure to provide the data prevents the establishment or continuation of the contractual relationship.
 - **Retention period:** the data will be retained for 10 years from termination of the contractual relationship.

- **Compliance with legal obligations**
 - **Purpose of processing:** to comply with obligations laid down by applicable law, including tax, administrative, civil law and accounting obligations, including those connected with the management of contractual relationships, supplies, sales or services.
 - **Legal basis:** compliance with a legal obligation to which the Controller is subject (Article 6(1)(c) GDPR).

- **Nature of provision:** mandatory; failure to provide the data prevents compliance with legal obligations.
- **Retention period:** the data will be retained for the periods prescribed by law (up to 10 years or longer, where required).
- **Management of contact requests, reports or requests for information**
 - **Purpose of processing:** to respond to requests, reports or questions submitted through contact channels (e.g. forms, email, telephone).
 - **Legal basis:** steps taken at the request of the Data Subject prior to entering into a contract (Article 6(1)(b) GDPR).
 - **Nature of provision:** mandatory; failure to provide the data prevents the request from being handled.
 - **Retention period:** up to 12 months from closure of the request.
- **Management of job applications and CVs**
 - **Purpose of processing:** to assess unsolicited applications or applications submitted through the “Work with Us” section, arrange any interviews and manage the recruitment and selection process.
 - **Legal basis:** steps taken at the request of the Data Subject prior to entering into a contract (Article 6(1)(b) GDPR).
 - **Nature of provision:** mandatory; failure to provide the data prevents the application from being assessed.
 - **Retention period:** up to 24 months from receipt of the CV.
- **Protection of the Controller’s rights**
 - **Purpose of processing:** to manage, prevent and resolve complaints, disputes or litigation connected with contractual relationships, and to protect the Controller’s rights in judicial or administrative proceedings.
 - **Legal basis:** the Controller’s legitimate interest in protecting its rights (Article 6(1)(f) GDPR).
 - **Nature of provision:** mandatory to the extent necessary for the protection of the Controller’s rights.
 - **Retention period:** for the time necessary to manage the dispute and until the expiry of the applicable limitation periods.
- **Sending promotional communications to customers (soft spam)**
 - **Purpose of processing:** to send by email promotional communications concerning products or services similar to those already purchased by Data Subjects, within the limits of Article 130(4) of the Privacy Code.
 - **Legal basis:** the Controller’s legitimate interest (Article 6(1)(f) GDPR), taking into account the existence of a previous contractual relationship and the Data Subject’s interest in receiving communications consistent with their previous purchases.
 - **Nature of provision:** optional; the Data Subject may object at any time by writing to the Controller or using the unsubscribe link included in the communications received. Once the Data Subject objects, the sending of such communications will cease immediately.
 - **Retention period:** until the right to object is exercised.
- **Marketing and promotional communications (subject to prior consent)**
 - **Purpose of processing:** subject to prior consent, to send promotional or advertising communications relating to products, services, events and corporate initiatives, newsletters and commercial updates, and to invite participation in surveys, market research and statistical analyses.
 - **Legal basis:** the Data Subject’s express consent (Article 6(1)(a) GDPR).

- **Nature of provision:** optional; failure to provide consent does not affect the other services offered. Consent may be withdrawn at any time by writing to the Controller's email address or using any unsubscribe mechanisms made available. Withdrawal of consent does not affect the lawfulness of processing carried out before its withdrawal.
- **Retention period:** until consent is withdrawn.

Methods of Processing and Security

Personal data are processed using electronic and IT tools and, where necessary, also on paper. In all cases, the Controller adopts appropriate technical and organisational measures to ensure the security and confidentiality of personal data and to prevent unauthorised access, disclosure, alteration, loss or destruction, whether accidental or unlawful.

Access to, Disclosure and Dissemination of Data

Personal data will be processed exclusively by duly trained personnel authorised by the Controller, who operate under its direct responsibility and in accordance with the purposes set out in this notice.

The data may also be disclosed to third parties that provide technical, IT, management, commercial or professional services necessary for the purposes listed above. Where such parties process data on behalf of the Controller, they are appointed as Data Processors pursuant to Article 28 GDPR. All third parties act on the basis of documented instructions provided by the Controller and have adopted appropriate technical and organisational measures to ensure the protection and confidentiality of the personal data processed.

The data may also be disclosed to public or judicial authorities solely in the cases provided for by law, or where required to protect the Controller's rights in administrative or judicial proceedings.

Under no circumstances will personal data be disseminated, i.e. made accessible to unspecified or unauthorised persons.

International Data Transfers

Personal data are stored within the European Union. Any transfers to countries outside the EU will take place only to countries that ensure an adequate level of protection or by means of mechanisms compliant with applicable data protection legislation.

Data Subjects' Rights

Data Subjects may exercise the following rights:

to obtain confirmation from the Controller as to whether or not personal data concerning them are being processed and, where that is the case, to obtain access to the personal data and related information, including the possibility of receiving a copy (**right of access**);
to obtain from the Controller the rectification of inaccurate personal data or completion of incomplete personal data concerning them (**right to rectification**);

where the applicable conditions are met, to obtain from the Controller the erasure of personal data (**right to erasure**);

where the applicable conditions are met, to obtain from the Controller restriction of the processing of all or part of the personal data processed by the Controller (**right to restriction of processing**);

where the processing is based on consent or on the performance of a contract to which the Data Subject is a party and is carried out by automated means, to request and receive from the Controller, in a commonly used electronic format, the personal data concerning them and, where technically feasible, to have those data transmitted to another controller (**right to data portability**);

to withdraw at any time any consent given in relation to the processing of personal data (**right to withdraw consent**);

where the applicable conditions are met, to object, in whole or in part, to the processing of personal data (**right to object**);

where the applicable conditions are met, **not to be subject to a decision based solely on automated processing**.

If a Data Subject considers that the processing of personal data is carried out in breach of applicable data protection legislation, they have the right **to lodge a complaint with the Italian Data Protection Authority (Garante per la protezione dei dati personali)** or, **where applicable, to seek judicial remedies before the competent courts**.

How to Exercise Your Rights

Data Subjects may exercise their rights at any time by contacting the Controller at:

AIRBANK S.R.L.

Via Luigi Bay - 29121 Piacenza (PC), Italy

Tel. +39 0523 763134 - Fax +39 0523 763144

Email: info@airbank.it

Certified email (PEC): airbanksrl@legalmail.it