

Policy pursuant to Article 13 of Regulation (EU) no. 2016/679 ("GDPR")

Aruba S.p.a. (hereinafter "Aruba") protects the confidentiality of personal data and guarantees its necessary protection against any event that may put it at risk of violation.

As provided for by European Union Regulation No. 2016/679 (hereinafter "GDPR") and Article 13 in particular, please find below the information that we are required by law to provide to the user ("Data Subject") relating to the processing of their personal data.

SECTION I

Who we are and what data we process (Article 13, paragraph 1 (a), Article 15 (b) GDPR)

Aruba S.p.A., hereby represented by its pro tempore legal representative, with registered offices at Ponte San Pietro (BG), Via San Clemente, 53, acts as the Data Controller and can be contacted at privacy@staff.aruba.it; said Data Controller collects and/or receives information relating to you, the Data Subject, such as:

Category of data	Examples of types of data
Contact details	first name, last name, landline and/or mobile telephone number, email address(es)
Internet traffic data	Logs, originating IP address

Aruba *does not* require you to supply so-called "private" data, that is, according to the provisions of the GDPR (Art. 9), personal data that identifies race or ethnicity, political opinions, religion or philosophy, or any union affiliation, nor any genetic or biometric information used to uniquely identify a physical person, data associated with health or one's sex life, or sexual orientation. In the event the services requested from Aruba require the processing of this data, you will first receive specific notification with a request for your consent.

The Data Controller has appointed a Data Protection Officer (DPO) who can be contacted for any information or requests.

email: dpo@staff.aruba.it

Telephone number: 0575/0505

For any information or requests, please contact the following address

privacy@staff.aruba.it

Telephone number 0575/0505

SECTION II

Why we need your data (Art. 13, paragraph 1 GDPR)

The data is processed by the Data Controller in relation to navigation of the website www.arubaracing.it by you, and to fulfil the contact requests forwarded by you, provide support and fulfill the legal and regulatory obligations demanded of the Data Controller in accordance with the activities performed. In no case will Aruba resell any of your personal information to third parties nor use it for any purpose not stated.

In particular, your data will be processed for:

a) requests for contact and/or information materials

Your personal data is processed to implement preliminary and subsequent actions to manage information and contact requests, and/or to send information materials, as well as to satisfy any and all other obligations that may arise.

The legal basis for this processing is to provide the services relating to a request for registration, information and contact, and/or the sending of informational materials, and to comply with legal requirements.

d) business promotion activities on Services/Products offered by the Data Controller or by companies belonging to the Aruba Group

Your personal data may also be processed for business promotion purposes, for market research studies relating to Services/Products offered by the Data Controller or by companies belonging to the Aruba Group, but only if you have authorized this processing and have not opposed it.

This processing may occur by the following automated methods:

- e-mail;
- sms;
- telephone contact

and may occur:

1. if you have not withdrawn your consent for the use of your data;
2. if processing is done through contact with a telephone operator, and you are not registered on the non-call registry as outlined in Presidential Decree No. 178/2010;

The legal basis for this processing is the consent you initially granted for the processing itself, which you may freely withdraw at any time (see Section III).

e) digital security

In line with the provisions of Clause 49 of the GDPR and through its providers (third parties and/or recipients), the Data Controller processes your personal data involving traffic only to the extent strictly necessary and proportional for guaranteeing the security of the networks and the information. This means the capacity of a network or information system to block, at a given level of security, any unforeseen events or illegal or malicious acts that would compromise the availability, authenticity, integrity and confidentiality of the personal data stored or transmitted.

The Data Controller will immediately notify you if there is any risk of violation of their data, except for any obligations noted in the provisions of Art. 33 GDPR associated with notifications of personal data violations.

The legal basis for this processing is to comply with legal requirements and the legitimate interests of the Data Controller in undertaking processing for the purpose of protecting corporate assets and the security of the Aruba Group's offices and systems.

f) profiling

Your personal data may also be processed for profiling purposes (such as analyzing the transmitted data and the pre-selected Services/Products, suggesting advertising messages and/or business offers in line with user selections) exclusively when you have given explicit and informed consent. The legal basis for this processing is the consent you initially granted for the processing itself, which you may freely withdraw at any time (see Section III).

g) fraud prevention (Clause 47 and Art. 22 GDPR)

- except for special category data (Art. 9 GDPR) or data relating to criminal convictions and offences (Art. 10 GDPR), your personal data will be processed to allow controls for the purposes of monitoring and preventing fraudulent payments. This processing will be undertaken by software systems that run automated checks and will be carried out prior to negotiating Services/Products;
- a negative result from these checks will render the transaction impossible; you can, in any event, express your opinion, obtain an explanation or dispute the decision by outlining your reasons to the Customer Care Department or to privacy@staff.aruba.it;
- personal data collected only for anti-fraud purposes, which differs from the data needed for the proper performance of the service requested, shall be immediately deleted upon termination of the verification phase.

h) protection of minors

The Services/Products offered by the Controller are reserved for those entities legally able, based on national regulations, to satisfy contractual obligations.

To prevent illegal access to its services, the Data Controller implements preventive measures to protect its own interests, such as checking tax identification numbers and/or performing other checks, when necessary for specific Services/Products, with regard to the accuracy of the identification data on the identification documents issued by the applicable authorities.

Communication to third parties and categories of recipients (Article 13, paragraph 1 GDPR)

Your personal data is communicated mainly to third parties and/or recipients whose activity is necessary to perform the activities relating to the contract established, and to meet certain legal requirements, such as:

Categories of recipients	Purposes
Companies belonging to the Aruba S.p.A. Group ("Aruba Group")	Fulfillment of administrative and accounting requirements, as well as those connected with the services requested
Third-party providers, partners and companies belonging to the Aruba Group*	Performance of services (assistance, maintenance, delivery/shipping of products, performance of additional services, providers of networks and electronic communication services) associated with the requested service
External professionals/consultants and consulting firms	Fulfillment of legal requirements, exercising rights, protecting contractual rights, credit recovery
Financial Administration, Public Agencies, Legal Authorities, Supervisory and Oversight Authorities	Fulfillment of legal requirements, protection of rights; lists and registries held by Public Authorities or similar agencies based on specific regulations relating to the contractual service
Formally mandated subjects or those with recognized legal rights	Legal representatives, administrators, guardians, etc.

* The Controller requires its own third party providers and Data Processors to adhere to security measures that are equal to those adopted for you by restricting the Data Processor's scope of action to processing directly related to the requested service.

The Controller will not transfer your personal data to countries where the GDPR is not applicable (countries outside the EU) except where specifically indicated otherwise, in which case you will be first notified, and if necessary asked for your consent.

The legal basis for this processing is fulfillment of the services outlined in the established contract, compliance with legal obligations, and the legitimate interests of Aruba S.p.a. to perform the processing necessary for these purposes.

SECTION III

What happens when you do not provide your identification information as needed to perform the requested service? (Article 13, paragraph 2 (e) GDPR)

The collection and processing of your personal data is necessary for fulfilling the services requested. Should you fail to provide the personal data expressly stipulated as necessary on the order form, the Data Controller will not be able to carry out the processing associated with managing the requested services and/or the contract and the Services/Products associated with it, nor fulfill the operations dependent on them.

What happens if you do not grant consent for the processing of your personal data for business promotion activities on Services/Products?

When you do not give your consent to the processing of your personal data for these purposes, the processing will not be implemented for these specific purposes, but it will not affect the performance of the requested services or those for which you have already given your consent, if requested.

In the event you have given consent and later withdraw it or oppose the processing for business promotional activities, your data will no longer be processed for these activities, although this will not create negative effects or consequences for you or the services requested.

How we process your data (Article 32, GDPR)

The Controller makes use of appropriate security measures to preserve the confidentiality, integrity and availability of your personal data, and requires the same security measures from third party providers and the Processors.

Where we process your data

Your data is stored in hard copy, electronic and remote archives located in countries where the GDPR is applicable (EU countries).

How long is your data stored? (Article 13, paragraph 2 (a) GDPR)

Unless you explicitly express your own desire to remove it, your personal data will be stored until required for the due purposes for which it was collected.

In particular, the data will be stored for a maximum period of 12 (twelve) months.

For data provided to the Data Controller for the purposes of business promotion, for which you initially gave consent, this will be stored for 12 months, unless such consent is withdrawn.

For data provided to the Controller for the purposes of profiling, it will be stored for 12 months, again except when consent has been withdrawn.

It is also important to add that, should the user forward to Aruba personal data that has not been requested or that is unnecessary for the purposes of performing the services requested, or for the delivery of a service strictly related thereto, Aruba cannot be considered controller of this data and will proceed to delete it as soon as possible.

Regardless of your determination to remove the data, your personal information will be, in any case, stored according to the terms outlined in current law and/or national regulations, for the exclusive purpose of guaranteeing specific requirements, applicable to

certain Services (for example, but not limited to, Certified Electronic Mail, Digital Signature, Digital Preservation - refer to the associated section).

Furthermore, personal data will in any case be stored to comply with obligations (e.g. tax and accounting purposes) which may continue even after termination of the contract (Art. 2220 Civil Code); for these purposes, the Controller shall retain only the data necessary to complete these activities.

For those cases where the rights arising from the contract and/or registration are used in the courts, your personal data, exclusively required for these purposes, shall be processed for the time necessary to complete them.

What are your rights? (Articles 15 – 20 GDPR)

You have the right to obtain the following from the Data Controller:

a) confirmation on whether your personal data is being processed and if so, to obtain access to your personal data and the following information:

1. the purposes of the processing;
2. the categories of personal data in question;
3. the recipients or categories of recipients that have received or will receive your personal data, in particular if these recipients are in third party countries or are international organizations;
4. when possible, the anticipated storage period of your personal data or, if not possible, the criteria used to determine this period;
5. whether you have the right to ask the Data Controller to correct or delete your personal data or the limits on processing your personal data or to oppose the processing of the data;
6. the right to file a claim with a supervisory authority;
7. in the event the data is not collected from you, all of the information available regarding its source;
8. whether there is an automated decision process, including profiling, and, at least in these cases, significant information on the logic used, as well as the importance and consequences to you for this processing.
9. the suitable guarantees provided by the third party country (outside EU) or international organization to protect any transferred data

b) the right to obtain a copy of the personal data processed, again given that this right does not affect the rights and freedoms of others; for extra copies requested by you, the Data Controller may assign a reasonable fee based on administrative costs.

c) the right to edit any of your incorrect personal data from the Data Controller without unjustified delay

d) the right to have your personal data deleted by the Data Controller without unjustified delay, if any of the grounds outlined in the GDPR, Article 17, applies; this is also the case, for example, if the data is no longer needed for processing or if the data is considered unlawful, and as long as the conditions provided by law are fulfilled; and in any event, if the processing is not justified on other equally legitimate grounds;

e) the right to obtain limits on the processing from the Data Controller, in those cases outlined in Art. 18 of the GDPR, for example where you have disputed the correctness, for the period necessary for the Data Controller to verify the data's accuracy. You must be notified, within an appropriate time, even when the suspension period has passed or the cause of limiting the processing has been eliminated, and therefore the limitation itself has been withdrawn;

f) the right to obtain information from the Data Controller on the recipients who have received the requests for any corrections or deletions or limits on the processing implemented, except when this is impossible or would create a disproportionate effort.

g) the right to receive your personal data in a structured format, commonly used and readable by automatic devices as well as the right to forward this data to another Data Controller without obstruction from the original Data Controller, in those cases outlined by Art. 20 of the GDPR, and the right to obtain direct forwarding of your personal data from one Data Controller to another, if technically feasible.

For further information and to send your request, contact the Data Controller at privacy@staff.aruba.it. To guarantee that the above-mentioned rights are exercised by you and not by unauthorized third parties, the Data Controller may require you to provide other information that may be necessary for this purpose.

How and when can you oppose the processing of your personal data? (Art. 21 GDPR)

For reasons relating to your own particular situation, you may at any time oppose the processing of your personal data if it is based on legitimate reasons or if the processing is undertaken for business promotion activities, by sending a request to the Data Controller at privacy@staff.aruba.it.

You have the right to have your own personal data deleted if the Data Controller has no legitimate reason prevailing over such request, and in any case, where you have opposed the processing for business promotional activities.

Who can you file a claim with? (Art. 15 GDPR)

Without prejudice to any other ongoing administrative or judicial action, you may file a claim with the applicable supervisory authority of the Italian territory (Italian Personal Data Protection Authority), that is, with the agency that performs its duties and exercises its rights within the member country where the GDPR violation occurred.

Any updates to this information shall be communicated in a timely manner and through suitable means, and will be notified to you if the Data Controller processes your data for purposes other than those outlined in this notice prior to proceeding and after you have given your consent, if necessary.