

# Privacy notice

## INTRODUCTION

This is Aidro's privacy notice.

Aidro respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

## 1. IMPORTANT INFORMATION AND WHO WE ARE PURPOSE OF THIS PRIVACY NOTICE

This privacy notice aims to give you information on how Aidro collects and processes your personal data. It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

### CONTROLLER

This privacy notice is issued on behalf of Aidro so when we mention Aidro "we", "us" or "our" in this privacy notice, we are referring to the relevant company in tAidro responsible for processing your data. We will let you know which entity in Aidro will be the controller for your data when you provide us with any personal data. Unless we inform you otherwise in writing, Aidro plc will be the data controller.

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact us using the details set out below.

### CONTACT DETAILS

Our full details are:

Email address: [aidro@aidro.it](mailto:aidro@aidro.it)

Postal address: Via Prati Bassi 36 - 21020 Taino (VA) - Italy

Telephone number: +39 0331960075

### CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us using the contact details provided above.

## 2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

Identity Data including your first name, last name and title and job title.

Contact Data including your business address, email address and telephone numbers.

Preference Data including your industry, the Aidro products that you are interested in and your communication preferences.

Unless you provide it to us, we will not intentionally collect any Special Categories of Personal Data about you (for example, details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, and genetic and biometric data).

## 3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you, although this is mainly through meetings, our websites and web shops, our software products, software that may be used in our website, exhibitions, events and other direct interactions, as well as existing business contacts and publicly available information. You may give us your Identity, Contact and Preference Data by filling in forms or by corresponding with us by post, phone, email, in person or otherwise. We also work closely with third parties (including, for example, distributors, sub-contractors for technical, payment and delivery services, analytics providers, credit reference agencies) and may receive information about you from them.

## 4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances (“lawful bases”):

Consent - Where you have given us consent to use your personal data for the purposes for which we intend to use it.

Performance of Contract - Where it is necessary to process your personal data to perform a contract that we have entered into with you or to take steps at your request before entering into such a contract.

Legitimate Interest - Where it is necessary for the interests of our business in conducting and managing our business to enable us to give you the best products and services, and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Legal Obligation - Where it is necessary to process your personal data to comply with a legal or regulatory obligation that we are subject to.

### CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to obtain an explanation as to how we have decided that the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

Internal third parties - other companies in Aidro acting as controllers or processors of your data.

External third parties – including:

Service providers acting as our processors who provide IT and system administration services.

Professional advisers acting as our processors or joint controllers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.

Tax authorities, regulators and other government authorities or legal bodies acting as processors or controllers who require reporting of processing activities in certain circumstances.

Sales intermediaries, payment providers, and sub-contractors for technical and delivery services.

Our service providers that assist us with our marketing initiatives and provide technology to assist us with collection of data at events.

Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If such a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security and confidentiality of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## 6. INTERNATIONAL TRANSFERS

Some of our Internal and External Third Parties are based outside the European Economic Area (the “EEA”) so their processing of your personal data may involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we use all reasonable efforts to ensure a similar degree of protection is afforded to it by ensuring a legal safeguard is implemented in respect of that transfer. For example, where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.

## 7. DATA SECURITY

We have put in place appropriate technical and security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to access your data. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable

regulator of a breach where we are legally required to do so.

## 8. DATA RETENTION

### HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances you can ask us to delete your data, see request erasure below for further information.

In some circumstances we may anonymise your personal data (such that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## 9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

Request access to your personal data - commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of your personal data - this enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data - this enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it.

Object to our processing of your personal data - where we are relying on a legitimate interest and you feel it impacts on your fundamental rights and freedoms or where we are processing your personal data for direct marketing purposes.

Request restriction of processing your personal data - this enables you to ask us to suspend the processing of your personal data in certain circumstances.

Request transfer of your personal data - subject to certain conditions, you are entitled to receive the personal data which you have provided to us and which is processed by us by automated means, in a structured, commonly-used machine readable format.

Right to withdraw your consent to our processing of your data - where our processing of your personal data is based on your consent you have the right to withdraw your consent at any time.

If you wish to exercise any of the rights set out above, please contact us.

### NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.