



Privacy Policy pursuant to Articles 13 and 14 of Regulation (EU) 2016/679

Pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 (the “Regulation”), SeFlow S.r.l., (“Data Controller”), hereby provides below to its customers, including potential customers, as well as third parties in general (e.g. delegates, legal representatives, etc.) who come in contact with SeFlow on behalf of or as mandated by customers, including potential customers (the “Data Subjects”), the information required by law relating to the processing of their personal data (“Data”).



ABOUT US

Data Controller SeFlow S.r.l., with registered office in Ponte San Pietro (BG) at Via San Clemente No. 53
privacy@staff.aruba.it

Data Protection Officer (DPO) dpo@staff.aruba.it



HOW WE COLLECT PERSONAL DATA

The data processed by the Data Controller are acquired as follows:

- from the Data Subject, also through remote communications techniques used by the Data Controller (e.g. websites, smartphone and tablet apps, call centres, etc.);
- from third parties (e.g. those arranging transactions for the Data Subject, business information and financial risk companies, external companies for market research purposes, etc.).

Data from public sources, such as public registers, lists, public domain documents (e.g. financial statements, information contained in the register of companies at the Chambers of Commerce, real estate deeds and other so-called detrimental acts, such as the registration of mortgages or the transcription of attachments), as well as data extracted from sources that can be publicly and generally accessed by anyone, such as print or digital newspapers, information from telephone directories, websites of public bodies or other supervisory and control authorities, will also be used.



WHAT DATA DO WE PROCESS

CATEGORY OF DATA	EXAMPLES OF TYPES OF DATA
Personal information	Name, surname, street address, nationality, province and municipality of residence, landline and/or mobile phone number, fax, taxpayer ID number, email address, copy of identification document
Banking information	IBAN and banking/postal account information (except for Credit Card number)
Log	Source IP address, Log (system and network)
Internet traffic Data	Data processed for the purpose of the conveyance of a communication on an electronic communications network or for the billing thereof



WHY ARE THE DATA SUBJECT'S DATA NEEDED

PURPOSES OF THE PROCESSING	LEGAL BASIS
Registration and management of contact requests and/or information materials	The legal basis for this processing is to provide the services relating to a request for registration, information and contact and/or to send information materials and to comply with legal requirements.

The Data Subject's personal data are processed to implement preliminary actions and those following a registration request, to manage information and contact requests, and/or to send informational materials, as well as to satisfy any and all other obligations arising herewith.

The provision of the data is optional. However if the Data Subject refuses to provide the data, it will not be possible for the Data Controller to provide the requested service.

Management of the contractual relationship

The Data Subject's personal data are processed to implement actions in preparation of and following the purchase of a Service and/or a Product, such as management of the relevant order, provision of the Service itself and/or production and/or shipping of the purchased Product, related invoicing and payment management, handling of any claims and/or notifications to the support service and provision of the support itself, sending communications for information as well as fulfilment of any and all other obligations arising from the contract.

The legal basis for this processing is to provide the services relating to the contractual relationship and to comply with the legal requirements.

The provision of the data is optional. However if the Data Subject refuses to provide the data, it will not be possible for the Data Controller to provide the requested service.

Defending a right in court or out of court

The Data Subject's personal data are processed to ascertain, exercise or defend a right of the Data Controller and/or to defend itself against third party claims, in court or out of court.

The legal basis of the processing is the pursuit of the legitimate interest of the Data Controller, given the balance of the rights of the latter and the Data Subject.

Physical and Information Security

The Data Subject's personal data are processed to ensure network and information security, the protection of corporate assets and the security of the Aruba Group's offices and corporate systems.

The legal basis for this processing is compliance with the law and the pursuit of the legitimate interest of the Data Controller, given the balance of rights of the latter and the Data Subject.

The Data Subject has the right to object at any time to the processing of their personal data for the purpose in question, on grounds relating to their personal situation.

Fraud prevention

The Data Subject's personal data are processed to allow controls that monitor and prevent fraudulent payments by software systems running automated checks, prior to the negotiation of Services/Products. If these checks return a negative result it will be impossible to complete the transaction; the Data Subject can, of course, express their opinion, request an explanation, or challenge the decision by sending their reasons to Customer Support or to privacy@staff.aruba.it.

The legal basis of the processing is the pursuit of the legitimate interest of the Data Controller, given the balance of the rights of the latter and the Data Subject.

The Data Subject has the right to object at any time to the processing of their personal data for the purpose in question, on grounds relating to their personal situation.

Promotional activities for Services/Products similar to those purchased

The Data Subject's personal data are processed in order to send emails relating to promotions and offers relating to the Data Controller's Services/Products identical and/or similar to those covered by the current contract with the Data Subject, unless the Data Subject objected to the processing, initially or during subsequent communications.

The legal basis for the processing is the Data Controller's legitimate interest in promoting products or services which may reasonably be of interest to the Data Subject, given the balance of the rights of the latter and the Data Controller.

The Data Subject has the right to object at any time to the processing of their personal data for the purpose in question, on grounds relating to their personal situation.

Promotional activities for Services/Products offered by Seflow

The Data Subject's personal data are processed in order to send, with specific consent, promotional communications and offers relating to the Data Controller's Services/Products through traditional methods (e.g. ordinary mail, landline calls) and/or automated methods (e.g. email, SMS, MMS, fax, pre-recorded calls).

The legal basis of this processing is the consent initially granted by the Data Subject for the processing itself, which may freely be withdrawn at any time, without prejudice to the lawfulness of any previous processing.

If the Data Subject refuses to give their consent, it will not be possible to use the relevant services, without this entailing detrimental consequences for the contractual relationship with the Data Controller.

Promotional activities for Services/Products of the Aruba Group companies

The Data Subject's personal data are processed in order to send, with specific consent, communications of promotions and offers of Services/Products of Aruba Group companies through traditional methods (e.g. ordinary mail, landline calls) and/or automated methods (e.g. email, SMS, MMS, fax, pre-recorded phone calls).

The legal basis of this processing is the consent initially granted by the Data Subject for the processing itself, which may freely be withdrawn at any time, without prejudice to the lawfulness of any previous processing.

If the Data Subject refuses to give their consent, it will not be possible to use the relevant services, without this entailing detrimental consequences for the contractual relationship with the Data Controller.

Profiling

The Data Subject's personal data are processed, with specific consent, for profiling purposes such as the analysis of the transmitted data and the purchased Services/Products in order to offer advertising messages and/or business deals that are aligned with user selections.

The legal basis of this processing is the consent initially granted by the Data Subject for the processing itself, which may freely be withdrawn at any time, without prejudice to the lawfulness of any previous processing.

If the Data Subject refuses to give their consent, it will not be possible to use the relevant services, without this entailing detrimental consequences for the contractual relationship with the Data Controller.



TO WHOM DO WE COMMUNICATE THE DATA SUBJECT'S DATA

CATEGORIES OF RECIPIENT

PURPOSE

Companies belonging to the Aruba S.p.A. Group ("Aruba Group")	Fulfilment of administrative and accounting requirements, as well as those connected with the services requested
Third party providers 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
Credit and electronic payment institutions, banks/post offices	Managing deposits, payments, reimbursements associated with the contractual service
External professionals/consultants and consulting firms	Fulfilment of legal requirements, exercising rights, protecting contractual rights, credit recovery
Financial Administration, Public Agencies, Legal Authorities, Supervisory and Oversight Authorities	Fulfilment of legal requirements, defence of rights; lists and registers held by Public Authorities or similar agencies based on specific regulations relating to the requested service
Formally mandated subjects or those with recognized legal rights	Legal representatives, administrators, guardians, etc.

Persons belonging to these categories operate independently as separate data controllers or as data processors appointed by the Data Controller. The Data Controller's personnel that are specially authorised for processing, including interns, temporary workers, consultants, may also have knowledge of the data, in relation to the performance of their assigned tasks. In no case shall personal data be disclosed and they shall not, therefore, be accessible by undefined parties, in any form, for example by them being made available or subject to consultation.



HOW WE PROCESS THE DATA SUBJECT'S DATA

The data shall be processed using manual, electronic and remote means and in accordance with the requirements set by the relevant legislation, which seeks to ensure the confidentiality, integrity and availability of the Data, and to avoid material or moral damages.



WHERE WE PROCESS THE DATA SUBJECT'S DATA

The Data Subject's data is stored in archives located in European Union countries. Where necessary for the pursuit of the stated purposes, the Data Subject's Data may be transferred abroad, to countries/organizations outside the European Union guaranteeing a level of personal data protection deemed adequate by the European Commission by its own decision or, otherwise, on the basis of other appropriate safeguards, such as the Standard Contractual Clauses adopted by the European Commission or the Data Subject's consent. The Data Subject is entitled to obtain a copy of any appropriate safeguards, as well as the list of countries/organizations to which the data has been transferred by writing to privacy@staff.aruba.it.



HOW LONG WE RETAIN THE DATA SUBJECT'S DATA

The Data will be held in a form which enables the Data Subject to be identified for no longer than is necessary for the collection purposes, given the laws covering the activities and sectors in which the Data Controller operates. Once the periods thus established have transpired, the Data will be deleted or processed anonymously, unless further retention is necessary to comply with obligations (e.g. tax and accounting) that may persist even after termination of the contract (Art. 2220 of the Civil Code) or to comply with orders issued by Public Authorities and/or Supervisory Bodies.



WHAT ARE THE DATA SUBJECT'S RIGHTS

The Data Subject shall contact privacy@staff.aruba.it to exercise their the right to obtain, in the cases provided for in the Regulation, access to the data concerning him/her, deletion of the data, correction of incorrect data, completion of incomplete data, limitation on processing the data, portability of the data and opposition to the processing.

The Data Subject also has the right to lodge a claim with the competent Italian supervisory authority (Italian Personal Data Protection Authority) or with the agency performing its duties and exercises its rights in the member State where the breach occurred, as provided for in Art. 77 of the Regulation, as well as to file appropriate legal proceedings pursuant to Arts. 78 and 79 of the Regulation.