

Privacy Policy
provided pursuant to Articles 13, 14 and 26 of the European General Data Protection Regulation
2016/679 ("GDPR")

PRIVACY POLICY - "ECOGENTRA" AGREEMENT

1. WHO PROCESSES PERSONAL DATA?

Data controller

GreenRouter S.r.l., with registered office in Via Mascheroni n. 15, Milan (Italy), Fiscal Code 09360370960, which can be contacted at the following means: email: contact@greenrouter.it; phone number +390285210620.

In carrying out its activities, GreenRouter S.r.l. collects and processes your personal data as **Data Controller**, and, in this capacity, ensures the application of appropriate organisational and technical measures for the protection of personal data in compliance with the provisions of the applicable laws and regulations.

With reference to certain processing operations of personal data which are collected during negotiations, contract signing, or any subsequent phase of the execution of the service contract called "Ecogentra" (in all its different configurations), GreenRouter S.r.l. may also process personal data **as joint controller with GS1 Italy Servizi S.r.l.**, with registered office in Via P. Paleocapa n. 7, Milan (Italy), Fiscal Code 06166030962 (hereinafter GreenRouter S.r.l. and GS1 Italy Servizi S.r.l. jointly referred to as "**Joint Data Controllers**" and separately referred to as the "**Joint Data Controller**") pursuant to and for the purposes of Article 26 of the GDPR (as better specified in the joint control agreement between the parties and published on the Ecogentra website) a) as joint owners of the digital software platform called "Ecogentra" and b) contractually bound by a long-term agreement for the cooperation in the provision of the service Ecogentra, as well as c) for proven reasons of synergy and sharing of resources for the preparatory activities to the establishment of the contractual relationship and for the subsequent execution and management of such relationship and those instrumental and functional activities to its performance in all its phases, for the fulfilment of any other obligation arising from the contract, as well as for the purpose of accessing and processing the personal data collected by both parties from their end customers for the purposes specified below, for the purpose of being able to develop shared commercial and marketing strategies, through the performance of activities and initiatives, also for promotional purposes, aimed at developing and/or consolidating relations with their customers and, in general, actual and potential users and at improving the knowledge and dissemination of its respective services and products, also in the perspective of the completeness of the service and of the expansion of the range of services offered to end users.

2. WHO COLLECTS PERSONAL DATA AND WHICH PERSONAL DATA ARE COLLECTED?

GreenRouter S.r.l. collects and processes personal data (mainly referred to corporate contacts of Ecogentra customers or those directly related to Ecogentra customers) such as, by way of example but not limited to, company name, first name, last name, fiscal code/VAT number, email address, professional landline and/or mobile phone number, company name where you work and covered role, IP address used in the possible navigation of the websites managed by and referable to the Data Controller or to the Joint Data Controllers, as well as data related to the commercial and/or professional activity of said company and its contact details (PEC address, legal office address) and bank details (for the payment of the contractual fees). Images, photos and/or videos of you may also be collected during events or conferences. With respect to the processing of such data, you may receive a supplement to this Privacy Policy and a specific waiver and request for the collection and processing of personal data.

In addition to the provisions of the Data Controller and/or Joint Data Controllers Cookie Policy, the following data may also be collected and processed through the website Ecogentra and through the use of the relevant functionalities, the filling in of electronic forms and the use of services provided therein:

- browsing data: this data includes, by way of example, the data that the server automatically records each time the website is visited, such as the IP addresses of the computers used by the users who connect to the website (log file), the URI (Uniform Resource Identifier) addresses of the resources requested, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the user's operating system and IT environment. This category of data also includes the "Social Buttons" that exclusively allow the connection and display of the Data Controller and Joint Data Controllers social network profiles (created on social networks such as, for example, Facebook, Instagram, YouTube). These "buttons" exclusively allow users who are browsing the website to reach with a "click" the social networks referable to the Data Controller or to Joint Data Controllers. The interactions that take place within the social networks are in any case subject to the rules and privacy settings of the respective social networks;
- personal data voluntarily provided by users/visitors: this data is provided by users by filling in electronic forms in order to send information or contact requests or, where applicable, for the purpose of creating an account on the websites and/or for requesting, ordering and using the services made available therein. This category includes, by way of example, name and surname, company e-mail address and phone number, company name and covered role, further data and information that may be contained in messages sent to the addresses indicated on the websites or by filling in any electronic forms published therein.

3. ON WHAT LEGAL BASES AND FOR WHAT PURPOSES ARE PERSONAL DATA PROCESSED?

Personal data is processed for the following purposes:

- (i) for the activities preparatory to the establishment of the contractual relationship with GreenRouter S.r.l., for the subsequent execution and management of such relationship and for the activities related and functional to its performance, for the fulfilment of any other obligation arising from the contract, for the management of the websites referable to the Data Controller or the Joint Data Controllers and of the services rendered through them, as well as to follow up on the requests to receive information (*Article 6, letter (b), GDPR*);
- (ii) for the fulfilment of legal obligations (*Article 6 (c), GDPR*). The processing of the data may be necessary or required by the fulfilment of obligations arising from the law or from national and/or EU legislation in force and applicable to the Data Controller or to Joint Data Controllers, as well as from provisions issued by competent authorities and bodies;
- (iii) to pursue a legitimate interest of the Data Controller and/or the Joint Data Controllers (*Article 6 (f) GDPR*). In the context of relationships with data subjects there is a legitimate interest to process personal data for the legal defence of a right or interest before any competent authority or body, expressly including for debt recovery purposes, to proceed - also as a result of a partly automated, but not intrusive, "profiling" activity, which is proportionate and does not entail any negative or significant consequences for the data subject because it is carried out for statistical purposes and does not mainly concern personal data - to make a direct offer of products or services similar to those which were previously purchased, limited to the e-mail address provided in the context of the contractual relationship and unless the data subject objects to such processing (so-called *soft spamming*).

The processing of personal data may also take place, by virtue of a legitimate interest of the Data Controller and/or the Joint Data Controllers, for the purpose of carrying out the following promotional activities:

- a. for the sending of invitations and the subsequent management of your possible interest events, meetings, working groups for confrontation and cooperation purposes, seminars, round tables, conventions and meetings (also aimed at training), organised and managed by the Data Controller and/or the Joint Data Controllers or by third parties, autonomously or in collaboration with third parties from time to time identified in the invitations (brochures and/or presentations) that shall be transmitted or delivered to collect your possible participation (hereinafter referred to as "Event"/"Events");
- b. for the invitation to participate in surveys of various kinds, the creation and sending of newsletters, publications, studies, survey results, market analyses or analyses of specific industrial or commercial sectors, as well as any other kind of informative material, of your possible interest, prepared, edited and/or published by the Data Controller and/or the Joint Data Controllers, independently or in collaboration with third parties (hereinafter referred to as "Publications");
- c. to manage relations and interactions with the referents or "contact persons" of actual and potential customers and any other subjects with whom GreenRouter S.r.l. and/or GS1 Italy Servizi S.r.l. have established contractual/commercial relations, in order to better understand their needs and expectations, improve and develop new services. In order to achieve these purposes, personal data of the "contact persons", including yours, will be stored and retained in special databases owned by and/or available to the Joint Data Controllers.

The above initiatives may be managed and implemented by email or by telephone.

With regard to said matters, we remind you that you may, at any time, object to the commercial communications received by e-mail and unsubscribe from marketing by clicking on the appropriate link in the e-mails received or by sending a communication in the manner set out in the paragraph below "*What are the rights under the GDPR?*" as well as withdraw any consent given, easily, freely and free of charge by sending a communication in the manner set out in the paragraph below "*What are the rights under the GDPR?*"

4. WHAT ARE THE SOURCES FROM WHICH PERSONAL DATA IS COLLECTED AND WHAT HAPPENS IN CASE OF FAILURE TO PROVIDE PERSONAL DATA?

Personal data collected by the Data Controller or Joint Data Controllers may be provided:

- a) directly by the data subject or by a third party authorized by the data subject;
- b) by a Joint Data Controller to the other Joint Data Controller;
- c) by electronic communications system providers.

The provision of personal data is not mandatory, but it is necessary to enable the management of the contractual relationship and the fulfilment of any legal obligations, with the consequence that failure to provide, partial or incorrect provision of the data will make impossible, as applicable, to fulfil the contractual relationship and to execute the related services and/or to implement and process specific requests made by the data subject. Failure to provide the data may affect the possibility of interacting with the Data Controller for contractual purposes.

5. WHO CAN ACCESS TO PERSONAL DATA?

The following subjects may be recipients and therefore process the personal data collected by GreenRouter S.r.l. in their capacity as additional data controllers, Joint Data Controller, external data processors or authorised persons:

- GS1 Italy Servizi S.r.l., in its quality as Joint Data Controller;
- employees, outside staff and consultants of the Data Controller and the Joint Data Controller, as persons authorised to process data pursuant to Article 29 of the GDPR;
- legal or supervisory authorities, general government and other authorities, public bodies and organisations (domestic and foreign) in fulfilment of regulatory obligations, which will process them as autonomous data controllers;
- companies, professionals and consultants, appointed by the Data Controller and/or by the Joint Data Controllers to carry out activities related to the management of the organisation and/or the management of professional assignments or the possible defence in court, including, by way of example, auditing and financial statement certification companies, quality surveying and certification companies, banking institutions for the management of payments, supervisory and control bodies, accounting and tax consultants, legal consultants, credit recovery and consulting companies, IT assistance and data processing companies (e.g. web hosting, data entry, management and maintenance of IT infrastructures and services, etc.), postal service and mailing companies; all in their capacity, as applicable, as authorised persons, data processors or autonomous data controllers;
- companies providing IT services, cloud infrastructure and similar services, as external data processors or persons authorised to process data pursuant to Article 29 of the GDPR;
- any partners or contractual party connected or related to the Events or Publications as well as partners in projects referable to GreenRouter S.r.l. and/or GS1 Italy Servizi S.r.l. or participants in initiatives managed and coordinated by them as well as to third parties carrying out outsourcing activities in the interest of the Data Controller and/or the Joint Data Controllers, for the performance of activities and services functional to the organisation and/or management of the service Ecogentra or the Event or the sending of the Publications; all in their capacity as data processors.

Any international transfer of data to countries outside the European Union and/or the European Economic Area ("EEA") will only take place in compliance with the limits and conditions set forth in the GDPR and, therefore, only to countries that guarantee an adequate level of protection of personal data, where such adequacy is established by a decision of the European Commission or guaranteed on the basis of contractual instruments and specific clauses that ensure the implementation of technical and organisational security measures suitable for the protection of personal data. If these conditions are not fulfilled, a specific consent will be required to transfer data outside the EEA.

In any event, data will not be disclosed or disseminated, except where they are required and in accordance with the law, to law enforcement, legal authorities, information and security bodies or other public entities and for purposes of defence or State security or for the prevention, detection or prosecution of criminal offences.

6. HOW PERSONAL DATA ARE PROCESSED?

Personal data is processed through electronic and paper-based means and tools made available to persons acting under the authority of the Data Controller and, as applicable, of the Joint Data Controllers who are authorised and trained for this purpose. In particular, personal data is processed both through servers and systems exclusively and separately owned by the Joint Data Controllers and through the Shared Database of GreenRouter S.r.l. and GS1 Italy Servizi S.r.l., which allows both of them access to such data.

The paper and electronic archives are protected by adequate security measures to counter the risk of violation.

7. HOW LONG PERSONAL DATA ARE RETAINED?

Personal data processed by the Data Controller and by Joint Data Controllers is retained for the time necessary to carry out the activities connected to the management of the contractual relationship and for the related legal obligations and, for the period following its termination, for the fulfilment of any obligations necessary for the proper performance of the contractual or business relationship. Personal data processed on the basis of consent is retained until the consent is revoked.

For processing based on the legitimate interest of the Data Controller (and/or the Joint Data Controllers), personal data will be retained as long as this legitimate interest exists and, in any case, as long as there is an active relationship with the data subject, without prejudice to the data subject right to at any time object to such processing.

When the purposes justifying the retention of personal data have been fulfilled, such data will be deleted.

8. WHAT ARE THE RIGHTS UNDER THE GDPR?

In accordance with the provisions of GDPR, you have the right to:

- access to personal data, i.e. to obtain confirmation of the existence of the processing of your personal

data and to obtain specific information on the processing, such as, the purposes, the categories of data being processed and the existence of the other rights set out below;

- obtain the correction of personal data, i.e. obtaining the rectification/integration of your personal data;
- obtain the cancellation of personal data, i.e. obtaining the deletion of your data if (i) such data is no longer necessary for the purposes for which it was collected, (ii) you object to the processing of your personal data and there is no other overriding reasons for the processing, (iii) the personal data must be deleted due to legal obligation. This right does not apply if the processing is necessary for the fulfilment of a legal obligation or for the judicial ascertainment or exercise of a right;
- obtain the restriction of processing of personal data, i.e. obtaining the restriction of the processing of your personal data, which means that data processing will be suspended for a certain period of time;
- obtain the portability of personal data, i.e. the right to receive your personal data in a structured, commonly used and machine-readable format and to transmit them to another data controller;
- oppose to processing of personal data, i.e. objecting to the processing based on legitimate interest, unless the Data Controller or the Joint Data Controllers demonstrate the existence of legitimate grounds for processing which prevail on your rights;
- lodge a complaint to the competent supervisory authority (<http://www.garanteprivacy.it/>) in the cases provided for in Article 77 of the GDPR.

The above-mentioned rights, together with any request for clarification regarding the assessment of the existence of legitimate interest or the profiling activity, may be exercised by making a request to the Data Controller by writing to the above addresses or by sending an email to contact@greenrouter.com. A reply will be reasonably provided within five working days.

The updated version of this Privacy Policy can be found on the web page: <https://ecogentra.it/privacy-policy/>. Any amendments or updates will be brought to the user's attention by publication on the mentioned web page of the website and will be applicable and binding from that moment on.

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