

USER PRIVACY NOTE

This privacy notice, as required by current personal data protection legislation (Articles 13 and 14 of the EU Regulation 2016/679 - General Data Protection Regulation, hereinafter also referred to as GDPR), BKT Europe Srl (hereinafter also referred to as "Data Controller" or "Company") provides information regarding the processing of data of users who access the website bkt-easyhub.com (hereinafter also referred to as "website").

WHO IS THE DATA CONTROLLER AND HOW TO CONTACT

The Data Controller is BKT Europe Srl, with legal headquarters at Viale Bianca Maria 25, 20122 Milan and operational headquarters at Viale della Repubblica 133, 20831 Seregno (MB), VAT number n. 05404270968. The Company can be contacted via the email address support@bkt-easyhub.com

WHAT DATA IS PROCESSED

The processed data includes browsing data and data voluntarily provided by the user.

Browsing Data

The computer systems and software procedures used to operate this website acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols. This information is not collected to be associated with identified individuals, but by its very nature could, through processing and association with data held by third parties, allow users to be identified. This category of data includes IP addresses or domain names of computers used by users connecting to the site, URI (Uniform Resource Identifier) addresses of the requested resources, the time of the request, the method used to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the response from the server (successful, error, etc.) and other parameters related to the user's operating system and computer environment.

Cookies and Other Tracking Systems

The site uses technical and analytical cookies. Information about cookies is contained in the cookie policy accessible via a specific link on the site.

Data Provided Directly by the User

This category includes all personal data voluntarily provided by the user (for example, when requesting information by writing to the email addresses listed on the site or registering for a specific reserved area).

WHAT ARE THE PURPOSES AND LEGAL BASES OF THE PROCESSING?

Browsing Data

Browsing data is acquired for the purpose of site security and to check its correct functioning and could be used to ascertain responsibility in the event of hypothetical computer crimes against the website. The legal basis for the processing of such data is legitimate interest and, in the case of requests by Authorities, legal obligation.

Cookies and Other Tracking Systems

The site uses technical and analysis cookies. The release of analysis cookies is subject to the user's consent, which can be revoked at any time. Revocation of consent does not affect the lawfulness of the processing carried out previously. Information about cookies is contained in the cookie policy accessible via a specific link on the site.

Data Provided Directly by the User

Personal data optionally provided by the user by contacting the owner is used only to process any requests made. Therefore, the legal basis for the processing of such data is the execution of pre-contractual and contractual measures. For data provided through a specific registration form, please refer to the user registration policy, accessible via a link at the bottom of the form.

Security and Defense

If necessary, the aforementioned data may also be used in light of the legitimate interest of the owner consisting in verifying the security and correct functioning of the computer systems used and in carrying out defensive activities.

WHO CAN KNOW THE DATA?

The data will be processed by the Company's authorized personnel. External parties who may know the data being processed include: IT companies used by the owner for hosting services, for assistance and maintenance of the systems used, and for analysis services, legal consultants for litigation management and legal assistance. Data may also be communicated to competent Authorities in case of specific

requests that the owner is obliged to comply with. Some of the mentioned subjects operate as data processors, and the communication to those acting as independent data controllers is made because it is prescribed by law or necessary to carry out obligations arising from the contractual relationship or the legitimate interest of the owner consisting in maintaining the security of computer systems with maintenance interventions and in carrying out defensive activities through legal consultants. The interested party can request from the Owner a detailed list of the data recipients, to the extent that specific identification is possible. The communication is, however, limited to only those categories of data whose transmission is necessary for the performance of the activities and purposes pursued.

HOW IS DATA MANAGED?

The collected data is processed using computer and paper-based tools, in compliance with the security obligations prescribed by current legislation to prevent data loss, illicit or incorrect use, and unauthorized access.

Data Retention Periods

Browsing data does not persist for more than seven days (except for any need to investigate crimes by the Judiciary). Data acquired through the analysis service remains for 14 months. Data voluntarily provided by the user through contacts on the site is stored for the time strictly necessary to process the requests and then deleted, except for defensive needs (which may require further storage). Any defensive needs may also require the data to be stored beyond the indicated terms. For data provided through a specific registration form, please refer to the user registration policy, accessible via a link at the bottom of the form.

Data Transfer Abroad

Data will be processed within the EU as the Data Controller and the hosting service provider are based in Italy. For the email service used by the Owner, data will be transferred to non-EU countries, in the absence of adequacy decisions by the EU Commission, but the transfer will be assisted by adequate guarantees. The analysis service used by the site involves a transfer of data outside the EU, specifically to the United States. The guarantee adopted for such transfer is constituted by the adequacy decision of the EU Commission Data Privacy Framework.

WHAT HAPPENS IF DATA IS NOT PROVIDED?

Except for browsing data necessary for the implementation of computer and telecommunication protocols, the provision of data by users through the contacts available on the site is free and optional. However, failure to provide such data will result in the inability to proceed with the requests submitted or intended to be submitted by the user.

WHAT ARE THE RIGHTS OF THE INTERESTED PARTY?

The law recognizes the interested party, under Articles 15 to 22 of the GDPR, the right to ask the data controller for access to personal data and its rectification or deletion or the limitation of processing concerning them or to oppose their processing, in addition to the right to data portability.

In particular, the possibility to oppose the processing of data carried out for marketing purposes is highlighted.

For data automatically collected by the site, the owner may not be able to identify the user based on the information stored. Therefore, under Article 11 (2) of the GDPR, Articles 15 to 22 of the GDPR do not apply to such data, unless the user provides additional information that allows their identification to exercise the rights provided by these articles.

The interested party can assert their rights at any time, without formalities, by contacting the data controller.

Below are detailed the rights recognized by current personal data protection legislation.

- **The right of access**, namely the right to obtain from the data controller confirmation as to whether or not personal data concerning them are being processed and, if so, to gain access to the personal data and the following information: a) the purposes of the processing; b) the categories of personal data concerned; c) the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations; d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period; e) the existence of the right of the data subject to request from the data controller rectification or deletion of personal data or restriction of processing of personal data concerning the data subject or to object to such processing; f) the right to lodge a complaint with a supervisory authority; g) where the data is not collected from the data subject, any

available information as to their source; h) the existence of automated decision-making, including profiling, and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject. Where personal data are transferred to a third country or to an international organization, the data subject has the right to be informed of the existence of adequate safeguards relating to the transfer.

- **The right to rectification**, namely the right to obtain from the data controller the rectification of inaccurate personal data concerning them without undue delay. Taking into account the purposes of the processing, the data subject has the right to have incomplete personal data completed, including by means of providing a supplementary statement.
- **The right to erasure**, namely the right to obtain from the data controller the erasure of personal data concerning them without undue delay if: a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; b) the data subject withdraws consent on which the processing is based and where there is no other legal ground for the processing; c) the data subject objects to the processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller or for the purposes of the legitimate interests pursued by the controller or a third party, and there are no overriding legitimate grounds for the processing, or the data subject objects to processing for direct marketing purposes; d) the personal data have been unlawfully processed; e) the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject; f) the personal data have been collected in relation to the offer of information society services to children. However, the request for deletion cannot be accepted if the processing is necessary: a) for exercising the right of freedom of expression and information; b) for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller; c) for reasons of public interest in the area of public health; d) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, in so far as the erasure is likely to render impossible or seriously impair the achievement of the objectives of that processing; or e) for the establishment, exercise or defence of legal claims.

- **The right to restriction of processing**, namely the right to obtain that data are processed, except for storage, only with the consent of the data subject or for the establishment, exercise or defence of legal claims or to protect the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State if: a) the data subject contests the accuracy of the personal data, for a period enabling the controller to verify the accuracy of the personal data; b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead; c) although the controller no longer needs the personal data for the purposes of the processing, the personal data are required by the data subject for the establishment, exercise or defence of legal claims; d) the data subject has objected to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller or for the purposes of the legitimate interests pursued by the controller or a third party, pending the verification whether the legitimate grounds of the controller override those of the data subject.
- **The right to data portability**, namely the right to receive the personal data concerning them, which they have provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, as well as the right to have the personal data transmitted directly from one controller to another, where technically feasible, provided that the processing is based on consent or on a contract and the processing is carried out by automated means. This right does not affect the right to erasure.

RIGHT TO OBJECT:

The law also recognizes the right to object, namely the right for the data subject to object at any time, on grounds relating to their particular situation, to processing of personal data concerning them necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller or for the purposes of the legitimate interests pursued by the controller or a third party. Where personal data are processed for direct marketing purposes, the data subject has the right to object at any time to processing of personal data concerning them for such marketing, which includes profiling to the extent that it is related to such direct marketing.

The data subject is also informed that, should they believe that the processing of their personal data occurs in violation of the provisions of the GDPR, they have the right to lodge a complaint with the competent Supervisory Authority in their Country, as provided for by Article 77 of the Regulation, or to take appropriate legal action, as provided for by Article 79 of the Regulation.

This privacy notice was created on February 26, 2024