



## Complete Information – Clients

### Who we are and what we do with your personal data?

**TYKELAB S.r.l.**, with registered office at Via Benedetto Croce n. 19 - 00142 Roma (RM), (hereinafter also referred to as the Data Controller), as the data controller, is concerned about the confidentiality of your personal data and ensures that it is protected from any event that may put it at risk of violation.

The Data Controller implements policies and practices regarding the collection and use of personal data and the exercise of the rights granted to you by the applicable regulations. The Data Controller takes care to update the policies and practices adopted for the protection of personal data whenever necessary and, in any case, in the event of regulatory and organizational changes that may affect the processing of your personal data.

The Data Controller has appointed a Data Protection Officer (DPO) whom you can contact if you have questions about the policies and practices adopted.

You can contact the DPO at the following address: [privacy@tykelab.it](mailto:privacy@tykelab.it)

### How does the Data Controller collect and process your data?

The Data Controller collects and/or receives information that concerns you, such as:

- name, surname, gender, tax code, place and date of birth, physical and electronic address, telephone number (landline and/or mobile), POD/PDR code, VAT number, login data for the reserved area.
- data related to criminal convictions and offenses or related security measures (processed exclusively for the management of disputes)
- bank data
- identification documents and/or other
- economic and/or physical difficulties
- curriculum vitae and/or work and/or personal data (e.g., car, income, etc.)

The personal information that concerns you will be processed for:

#### **1) the management of the contractual relationship and the consequent compliance with regulatory obligations.**

The processing of your personal data is carried out to perform the preliminary and subsequent activities related to the management of the contractual relationship established, for the management of payments, the handling of complaints, as well as for the fulfilment of any other obligation arising from the contract, such as the registration and archiving of your personal data.

The obligations that the Data Controller must comply with due to the contract and specific regulations governing it include, among others:

- accounting maintenance.

Your personal data is also processed to prevent fraud, including contractual fraud. Finally, your data (such as landline and/or mobile phone numbers and electronic address) will be processed to provide assistance regarding the services covered by the contract.

Your personal data may also be used to send you specific communications and information related to contractual obligations or deadlines, methods of service delivery, or any business operational needs. Subject to the principles of necessity, relevance, and non-excess, such notices may be made by paper, telephone (landline or mobile with direct call, pre-recorded, and/or SMS), or electronic means (email).

Your personal data is also collected from third parties such as, for example:

- entities or companies to which the interested party belongs.

#### **2) for communication to third parties and recipients**

The processing of your personal data occurs based on the contract and the obligations, including legal and regulatory, that arise from it.



Your data will not be communicated to third parties/recipients for their own autonomous purposes unless:

1. you authorize it.

Your data will be communicated to third parties/recipients if:

1. it is necessary to fulfill the obligations arising from the contract and the laws governing it (e.g., to defend your rights, to report to control authorities, etc.);
2. the communication takes place to auditing and certification companies, quality assessment and certification companies, banks, law firms, transport companies, and couriers, IT consultants, consultants possibly involved in administrative and accounting management, the Revenue Agency, the Customs and Monopolies Agency, and the Financial Police.

### **What happens if you do not provide your data?**

If you do not provide your personal data, the Data Controller will not be able to carry out the processing related to the management of the contract and the services connected to it, nor the obligations dependent on them.

The Data Controller intends to carry out certain processing based on legitimate interests that do not prejudice your right to privacy, such as those that:

- prevent cybersecurity incidents and notify the control authority or communicate to users, if necessary, about personal data breaches;
- allow communication to third parties/recipients for activities related to contract management.

### **How and for how long is your data retained?**

#### **How**

Data processing is carried out through paper means or IT procedures by authorized and trained internal subjects. Access to your personal data is permitted to these individuals to the extent and within the limits necessary for the processing activities that concern you.

The Data Controller periodically verifies the tools used to process your data and the security measures in place, ensuring their constant update; it checks, also through authorized processing subjects, that no personal data that does not require processing is collected, processed, archived, or stored; it ensures that data is stored with guarantees of integrity and authenticity and used for the purposes of the processing actually carried out.

#### **Where**

Data is stored in paper, IT, and electronic archives located within the European Economic Area.

#### **How long**

The personal data processed by the Data Controller is retained for the time necessary to carry out the activities related to the management of the contract with the Data Controller and up to ten years after its conclusion (Article 2946 of the Civil Code) or from when the rights deriving from it can be exercised (according to Article 2935 of the Civil Code); as well as for fulfilling obligations (e.g., tax and accounting) that remain even after the conclusion of the contract (Article 2220 of the Civil Code), for which the Data Controller must retain only the data necessary for their pursuit. The cases in which rights deriving from the contract need to be enforced are reserved, in which case your data, only those necessary for such purposes, will be processed for the time necessary to achieve them.

You retain the right to object at any time to processing based on legitimate interest for reasons related to your particular situation.

### **What are your rights?**

In essence, you can, at any time and free of charge, without special charges or formalities for your request:

- obtain confirmation of the processing carried out by the Data Controller;
- access your personal data and know its origin (when the data is not obtained directly from you), the purposes and aims of the processing, the data of the subjects to whom it is communicated, the period of retention of your data or useful criteria to determine it;



- revoke consent at any time, if this constitutes the basis of the processing. However, the revocation of consent does not prejudice the lawfulness of the processing based on consent carried out before the revocation;
- update or rectify your personal data to ensure it is always accurate and correct;
- delete your personal data from the databases and/or archives, including backups of the Data Controller, in the event that they are no longer necessary for the purposes of processing or if the processing is deemed unlawful, and always if the conditions required by law are met; and in any case if the processing is not justified by another equally legitimate reason;
- limit the processing of your personal data in certain circumstances, for example, when you contest its accuracy, for the time necessary for the Data Controller to verify its accuracy. You must be informed, in a timely manner, also when the suspension period has expired or the reason for limiting the processing has ceased, and thus the limitation itself revoked;
- obtain your personal data, if received and/or otherwise processed by the Data Controller with your consent and/or if the processing is based on a contract and carried out with automated tools, in electronic format also for the purpose of transmitting them to another data controller.

The Data Controller must proceed accordingly without delay and, in any case, no later than one month from the receipt of your request. The term may be extended by two months, if necessary, considering the complexity and number of requests received by the Data Controller. In such cases, the Data Controller will inform you within one month from the receipt of your request and will keep you updated on the reasons for the extension. For any further information and to send your request, you must contact the Data Controller at the address [comunicazioni@tykelab.it](mailto:comunicazioni@tykelab.it)

#### **How and when can you object to the processing of your personal data?**

For reasons related to your particular situation, you can object at any time to the processing of your personal data if it is based on legitimate interest or if it concerns the processing of personal data whose provision is subject to your consent, by sending your request to the Data Controller at the address [comunicazioni@tykelab.it](mailto:comunicazioni@tykelab.it)

You have the right to delete your personal data if there is no overriding legitimate reason for processing that prevails over the reason for your request, and in any case if you have opposed the processing.

#### **To whom can you lodge a complaint?**

Without prejudice to any other action in administrative or judicial proceedings, you can lodge a complaint with the competent supervisory authority or with the one performing its duties and exercising its powers in Italy, where you have your habitual residence or work, or if different, in the Member State where the violation of Regulation (EU) 2016/679 occurred.

Any updates to this information will be communicated to you promptly and by appropriate means, and you will also be informed if the Data Controller intends to proceed with the processing of your data for purposes beyond those specified in this information before proceeding and in time to obtain your consent if necessary.