

Privacy Policy - Clients



| Version | Date |
|----------------|---------------------|
| 1 | 12/2/2025 |
| Company | Version name |
| ISAC SRL | 1 |

Privacy Policy on the Processing of the Personal Data

Clients

This privacy policy is provided pursuant to art. 13 of GDPR 679/2016 – “European Regulation on the protection of personal data”.

1 Purposes of the processing and legal basis

We inform you that the personal data provided by you and acquired by My Company in the context of the subscription of the assignment/contract will be processed in compliance with the confidentiality guarantees and security measures provided for by current legislation, also with the aid of electronic instruments directly and/or through third parties, for the purposes set out below together with the legal basis of reference:

| Purpose | Legal Basis | Data Processed |
|---|---|---|
| Defense in court | Processing necessary for the execution of a contract of which the data subject is a party or for the execution of pre-contractual measures adopted at the request of the same. Art. 6 c.1 lett b) Reg UE 2016/679 | Common personal data |
| | Processing necessary for the pursuit of the legitimate interest of the Data Controller or of third parties. Art. 6 c.1 lett f) Reg UE 2016/679 | Data relating to debt behavior, economic solvency and the presence of judicial measures Complaint data |
| Fulfillment of fiscal, accounting and other legal obligations | Processing necessary for the execution of a contract of which the data subject is a party or for the execution of pre-contractual measures adopted at the request of the same. Art. 6 c.1 lett b) Reg UE 2016/679 | Common personal data |
| Execution of contractual/pre-contractual measures and to respond to specific requests of the data subject | Processing necessary for the execution of a contract of which the data subject is a party or for the execution of pre-contractual measures adopted at the request of the same. Art. 6 c.1 lett b) Reg UE 2016/679 | Common personal data |
| | Processing necessary for the pursuit of the legitimate interest of the Data Controller or of third parties. Art. 6 c.1 lett f) Reg UE 2016/679 | Data relating to debt behavior, economic solvency and the presence of judicial measures Complaint data |

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| Execution of statistical research activities | Processing necessary for the pursuit of the legitimate interest of the Data Controller or of third parties. Art. 6 c.1 lett f) Reg UE 2016/679 | Complaint data |
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2 Mandatory or optional nature of the provision of data and consequences of a possible refusal to the provision

The nature of the provision of your personal data is mandatory so that the Data Controller can fulfill the obligations deriving from and arising from the contractual and/or pre-contractual relationship with you in place, as well as those imposed by law or regulations. Failure to provide your personal data will, in fact, make it impossible to establish or continue the contractual relationship to the extent that such data are necessary for the execution of the same.

If the data processing is based on your consent, the provision of your data is optional and non-acceptance and provision does not entail any consequences. In case of lack of consent, your data cannot be processed for the purpose described.

3 Period of retention of the personal data

| Retention Period | Purpose |
|--|---|
| The data will be processed for the period of time necessary to pursue the aforementioned purposes and in any case no more than 10 years from the termination of the contractual relationship. In the event of pending legal proceedings, the data will be processed until its closure. | Defense in court |
| | Fulfillment of tax, accounting and other legal obligations |
| | Execution of contractual/pre-contractual measures and to respond to specific requests of the interested party |
| | Execution of statistical research activities |

4 Contact details of the Data Controller

The Data Controller of your personal data is ISAC SRL, responsible to you for the lawful and correct use of your personal data and whom you can contact for any information or request at the following addresses:

Headquarters: Via Maestri del Lavoro 30 Cascina (Pisa) Italy

Phone/fax: +39 050 711131

E-mail: isacsrl@isacsrl.it

PEC: isacsrl.it@pec.it

5 Recipients and transfer of the extra-EU data

Your data may be transferred outside the European Economic Area. In this case, the Data Controller ensures that the processing of your personal data by these subjects to whom the data is transferred takes place in compliance with European Regulation 679/2016, all in accordance with the principles indicated in art. 45 of GDPR 2016/679 regarding the existence of an adequacy decision by the European Commission, or in the absence of such decisions in the presence of adequate guarantees pursuant to art. 46 of GDPR 2016/679 or in compliance with art 49 paragraph 1 lett. b) or c) – the transfer is necessary for the execution of a contract concluded between the data subject and the Data Controller or for the execution of pre-contractual measures adopted at the request of the data subject or the transfer is necessary for the conclusion or execution of a contract stipulated between the Data Controller and another natural or legal person in favor of the data subject. Further details and a copy of the data can be obtained by contacting the Data Controller at the addresses indicated in point 4.

Your data may be communicated, in addition to the personnel in charge of processing, also to the following subjects:

- Banks and credit institutions
- Consultants and companies that assist the Data Controller from an IT, infrastructural point of view and for the management of communication networks
- Risk centers
- Resellers and Distributors
- Private and public entities for the completion of administrative and legal practices
- Consultants and freelancers in single or associated form
- Partners, intermediary agencies, agents, brokers and resellers who collaborate with the Data Controller for the performance of the commercial activities subject to the contract/assignment
- Professionals, consortia and service companies and professional firms in the context of assistance and consultancy relationships (e.g. from a fiscal, commercial, legal, communication point of view, etc.)

The data will not be subject to other methods of dissemination.

6 Data Subject Rights

We inform you that as an interested party, you have, in addition to the right to lodge a complaint with the Supervisory Authority, the rights listed below, which you can assert by sending a specific request to the Data Controller and/or the Data Processor, contacting them at the addresses indicated in point 4.

| GDPR Regulatory Reference | Data Subject Rights |
|--|---|
| Art. 15 - Right of access | You have the right to obtain from the Data Controller confirmation as to whether or not personal data concerning you is being processed, and if so, to obtain access to the personal data and information concerning the processing. |
| Art. 16 - Right to rectification | You have the right to obtain from the Data Controller the rectification of inaccurate personal data concerning you without undue delay. Taking into account the purposes of the processing, you have the right to have incomplete personal data completed, including by means of providing a supplementary statement. |
| Art. 17 - Right to erasure (right to be forgotten) | You have the right to obtain from the Data Controller the erasure of personal data concerning you without undue delay and the Data Controller has the obligation to erase personal data without undue delay. |

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| <p>Art. 18 - Right to restriction of processing</p> | <p>You have the right to obtain from the Data Controller restriction of processing where one of the following applies:</p> <p>a) the data subject contests the accuracy of the personal data, for a period enabling the Data Controller to verify the accuracy of the personal data;</p> <p>b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;</p> <p>c) the Data Controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defense of legal claims;</p> <p>d) the data subject has objected to processing pursuant to Article 21(1) pending the verification whether the legitimate grounds of the Data Controller override those of the data subject.</p> |
| <p>Art. 20 - Right to data portability</p> | <p>You have the right to receive the personal data concerning you, which you have provided to a Data Controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another Data Controller without hindrance from the Data Controller to which the personal data have been provided. In exercising your right to data portability, you have the right to have the personal data transmitted directly from one Data Controller to another, where technically feasible.</p> |
| <p>Art. 21 - Right to object</p> | <p>You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you which is based on point (e) or (f) of Article 6(1), including profiling based on those provisions. If you have provided consent for one or more specific purposes, you have the right to withdraw that consent at any time.</p> |
| <p>Art. 22 - Right not to be subject to a process automated decision-making, including profiling</p> | <p>You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.</p> |