

# Information on the Processing of Personal Data Pursuant to Articles 13-14 of EU Regulation 2016/679

Data Subjects: Customers

**onOffice Italia SrI** (hereinafter "Data Controller"), acting as Data Controller and Processor depending on the specific purposes described below, processes your personal data in accordance with EU Regulation 2016/679 ("GDPR"). This regulation ensures the protection of individuals with regard to the processing of personal data. Processing is conducted based on the principles of fairness, lawfulness, transparency, and respect for your privacy and rights.

Your personal data will be handled in strict compliance with the legal provisions of the GDPR and the confidentiality obligations it prescribes.

### Purpose and Legal Basis of Processing

Your personal data will be processed for the following purposes, which are directly related to the fulfillment of legal or contractual obligations:

- Includes pre- and post-contractual activities, such as the sale of software, website creation, and SEO services. *Legal basis: Execution of a contract, (Article 6(1)(b) GDPR).*
- Processing of your data to meet mandatory requirements in tax and accounting matters, as well as obligations arising from applicable laws, regulations, and EU standards. *Legal basis: Legal obligation, (Article 6(1)(c) GDPR).*
- Sending newsletters and informational communications related to the services offered. Legal basis: Legitimate interest, (Article 6(1)(f) GDPR).
- Providing technical support services as part of the contractual relationship. *Legal basis: execution of a contract,* (Article 6(1)(b) GDPR).
- Investigating, asserting, or defending legal claims in judicial proceedings. Legal basis: Legitimate interest of the Data Controller, (Article 6(1)(f) GDPR); for special categories of data, Article 9(2)(f) GDPR.

The provision of accurate and complete information is mandatory for the proper management of the contractual relationship. Failure to provide such data may prevent the Data Controller from effectively performing the necessary processing activities.

The Data Controller informs that at any time, including at the time of collecting the data necessary for invoicing, the data subject may object to the use of their personal data (specifically contact data) for sending communications, newsletters, and marketing activities within the scope of the services offered. This processing does not require the consent of the data subject, as pursuant to Article 6(1)(f) and Recital 47 of the GDPR, as well as Article 130(4) of the amended Privacy Code (Legislative Decree 196/2003), the legitimate interest of the Data Controller constitutes the applicable legal basis.

# Methods of Processing: Your personal data may be processed using the following methods:

- · Processing by electronic devices.
- · Manual processing using paper archives.

All processing is carried out in compliance with Articles 6 and 32 of the GDPR and through the adoption of appropriate security measures.

#### Disclosure and Dissemination

Your data may be shared exclusively with public authorities and offices for fiscal reporting (e.g., Tax Agencies) or with banks and financial institutions. Where necessary to fulfill requested services, your data may also be shared with appointed consultants or service providers, always ensuring the protection of your rights. Only personnel expressly authorized by the Data Controller will process your data.

Your personal data will not be disseminated or made publicly available under any circumstances.

#### **Retention Period**

In compliance with the principles of lawfulness, purpose limitation, and data minimization as outlined in Article 5 of the GDPR, the retention period for your personal data is as follows:

- Accounting and fiscal data: Retained for 10 years as required by accounting and fiscal regulations, including Article 2220 of the Italian Civil Code and Article 22 of Presidential Decree No. 600 of September 29, 1973.
- **Other data:** Retained for 10 years after the end of the contract's validity or, in the case of disputes, for the statutory limitation period provided by applicable laws.

## Rights of the Data Subject

The data subject has the right to:

- 1. Obtain confirmation of whether or not personal data concerning them exists and receive such data in an intelligible form.
- 2. Request information regarding:
- a. The origin of the personal data.
- b. The purposes and methods of the processing.
- c. The logic applied in case of processing carried out with the aid of electronic tools.
- d. The identity of the Data Controller, Data Processors, and the representatives designated pursuant to Article 5(2).
- e. The entities or categories of entities to whom personal data may be communicated.
- 3. Request:
- a. Updating, rectification, or integration of data.
- b. Deletion, anonymization, or blocking of unlawfully processed data.
- c. Certification that actions regarding data correction or deletion have been communicated to those to whom the data was disclosed.
- d. Data portability.

- 4. Object, in whole or in part:
- a. For legitimate reasons, to the processing of personal data concerning them, even if pertinent to the purpose of collection.
- 5. Request the restriction of processing.

The data subject may exercise these rights by sending an email to contatti@onOffice.com or by submitting a written request to the contact addresses provided above.

If the data subject believes that the processing of their personal data violates applicable regulations, they may lodge a complaint with the Supervisory Authority for Personal Data Protection pursuant to Article 77 of Regulation 2016/679.