Privacy Policy pursuant to Article 13 of Regulation (EU) 2016/679

ABOUT US

Data Controller	Through its pro tempore legal representative, Aruba S.p.A., with registered office in Ponte San Pietro (BG) at Via San Clemente No. 53 privacy@staff.aruba.it
Data Protection Officer (DPO)	dpo@staff.aruba.it

WHAT DATA DO WE PROCESS

CATEGORY OF DATA	EXAMPLES OF TYPES OF DATA
Personal information	Name, surname, street address, nationality, province and municipality of residence, landline and/or mobile phone number, taxpayer ID number, email address

WHY ARE THE DATA SUBJECT'S DATA NEEDED

Registration and management of contact requests and/or information materials
Your personal data is processed to implement preliminary actions and those following a registration request, to manage information and contact requests, and/or to send informational materials, to registration/participation in webinars or events, as well as to satisfy any and all other obligations arising herewith.
The legal basis for this processing is to provide the services relating to a request for registration, information and contact and/or to send information materials and to comply with legal requirements.
The provision of the data is optional. However if the Data Subject refuses to provide the data, it will not be possible for the Data Controller to provide the requested service.

Promotional activities for Services/Products offered by Aruba and the Aruba Group companies
The Data Subject's personal data are processed in order to send, with specific consent, promotional communications and offers relating to the Data Controller' and the Aruba Group Companies' Services/Products through traditional methods (e.g. ordinary mail, landline calls) and/or automated methods (e.g. email, SMS, pre-recorded calls).
The legal basis of this processing is the consent initially granted by the Data Subject for the processing itself, which may freely be withdrawn at any time, without prejudice to the lawfulness of any previous processing.
If the Data Subject refuses to give their consent, this will not affect their ability to request information, be contacted again or participate in the initiatives proposed by the Data Controller.

TO WHOM DO WE COMMUNICATE THE DATA SUBJECT'S DATA

CATEGORIES OF RECIPIENT	PURPOSE
Companies belonging to the Aruba S.p.A. Group ("Aruba Group")	Fulfilment of administrative and accounting requirements, as well as those connected with the services requested
Third party providers and companies belonging to the Aruba Group	Provision of services connected with the services requested
External professionals/consultants and consulting firms	Fulfilment of legal requirements and exercising rights,

Persons belonging to these categories operate independently as separate data controllers or as data processors appointed by the Data Controller.
The Data Controller's personnel that are specially authorised for processing, including interns, temporary workers, consultants, may also have knowledge of the data, in relation to the performance of their assigned tasks.
In no case shall personal data be disclosed and they shall not, therefore, be accessible by undefined parties, in any form, for example by them being made available or subject to consultation.

HOW WE PROCESS THE DATA SUBJECT'S DATA

The data shall be processed using manual, electronic and remote means and in accordance with the requirements set by the relevant legislation, which seeks to ensure the confidentiality, integrity and availability of the Data, and to avoid material or moral damages.

WHERE WE PROCESS THE DATA SUBJECT'S DATA

The Data Subject's data is stored in archives located in European Union countries. Where necessary for the pursuit of the stated purposes, the Data Subject's Data may be transferred abroad, to countries/organizations outside the European Union guaranteeing a level of personal data protection deemed adequate by the European Commission by its own decision or, otherwise, on the basis of other appropriate safeguards, such as the Standard Contractual Clauses adopted by the European Commission or the Data Subject's consent.
The Data Subject is entitled to obtain a copy of any appropriate safeguards, as well as the list of countries/organizations to which the data has been transferred by writing to privacy@staff.aruba.it.

HOW LONG WE RETAIN THE DATA SUBJECT'S DATA

The Data Subject's personal data will be retained for 12 months from the date of collection for the purposes of managing requests for information and contact, sending informational material, and registering for and participating in webinars or events. Personal contact data will be processed for promotional purposes for a maximum period of 12 months from the date consent is given, unless the Data Subject withdraws their consent or objects to the processing before the expiry of this period. Once the periods thus established have transpired, the Data are deleted or processed anonymously, unless further retention is necessary to comply with orders issued by Public Authorities and/or Supervisory Bodies.

WHAT ARE THE DATA SUBJECT'S RIGHTS

The Data Subject shall contact privacy@staff.aruba.it to exercise their right to obtain, in the cases provided for in the Regulation, access to the data concerning him/her, deletion of the data, correction of incorrect data, completion of incomplete data, limitation on processing the data, portability of the data and opposition to the processing.

The Data Subject also has the right to lodge a claim with the competent Italian supervisory authority (Italian Personal Data Protection Authority) or with the agency performing its duties and exercises its rights in the member State where the breach occurred, as provided for in Art. 77 of the Regulation, as well as to file appropriate legal proceedings pursuant to Arts. 78 and 79 of the Regulation.