CLIENT PRIVACY NOTICE

Bhblasted Srl Società Benefit, with registered office in Via Boscofangone Zona ASI Lotto C8 – 80035 Nola (NA) (VAT number: 08466861211) Pec: bhblasted@pec.it Peo: infolegal@bhblasted.com, as Data Controller pursuant to art. 1 of Legislative Decree 30 June 2003, n. 196 - Privacy Code (hereinafter "Code") and articles 4, n. 7) and 24 of EU Regulation 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data (hereinafter, "Regulation") informs pursuant to art. 13 of the Regulation that it will process personal data relating to customers when they are natural persons.

1. Introduction

According to the European General Data Protection Regulation (GDPR), legal entities are not considered data subjects and therefore the GDPR does not apply. However, if in the context of the collection of company data, personal data relating to a natural person (e.g. company contact) is collected, this person will be considered data subject according to the aforementioned regulation and the applicable law will apply.

2. Object of the treatment

The data processed are personal data, contact information, accounting and tax information.

3. Purpose of processing and legal bases

The data processing will be carried out to enable the performance of activities related to the establishment and management of the service requested from the Data Controller.

The personal data referred in art. 2 will be processed for the following purposes:

i. for administrative purposes;
ii. for processing and issuing of invoices and for keeping accounts;
iii. compliance with legal and contractual obligations;
iv. sending transactional emails;
v. the defence of rights in legal proceedings;
vi. sending of commercial communications via email regarding the services offered by Bhblasted Srl Società Benefit;
vii. the sending of indirect commercial communications via email.

With reference to points i) to iv) it is noted that the processing is necessary for the execution of a contract to which the Data Subject is a party; to fulfill a legal obligation to which the data controller is subject; for accounting and tax purposes. The provision of the requested data is mandatory as it is necessary to perform the service and any refusal to provide such data could result in the failure to complete or maintain the contractual relationship.

With reference to point v), the legal basis lies in the Data Controller's legitimate interest in exercising or defending their rights. It is specified that this processing may only take place if, during the term of the contract or within the terms established by law, a dispute arises.

With reference to point vi), the legal basis is found in art. 130 co. 4 of Legislative Decree 196/03.

Finally, with reference to point vii), the legal basis lies in the freely given consent of the data subject.

4. Methods and duration of processing

The Data Controller will process the personal data for the time necessary to fulfill the purposes set out above and in any case for no longer than 10 years from the termination of the contract and/or any act interrupting the statute of limitations. The data may be processed for a longer period in the event of litigation.

For marketing purposes (direct and/or indirect), the data will be deleted after 1 year from the last email sent or until the opt-out is exercised by the Data Subject.

The processing will be carried out with digital and/or analog means. The data will not be subject to public disclosure and will be processed lawfully, fairly and with the utmost confidentiality, in compliance with the appropriate security measures as provided for by the Code and the Regulation.

5. Communication of data

The Data Controller may communicate the data for the purposes referred to in art. 3 to:

- to bodies, companies or individuals who maintain relationships with Bhblasted Srl Società Benefit to support the pursuit of the statutory purposes and who carry out outsourcing activities on behalf of the Data Controller, in their capacity as external data controllers;
- to persons who carry out accounting activities and consequent obligations on behalf of Bhblasted Srl Società Benefit;
- to companies that carry out management and maintenance activities of electronic communication devices and the related consequent obligations on behalf of Bhblasted Srl Società Benefit;
- to the judicial and police authorities or to other public administrations for the fulfillment of regulatory obligations.

6. Data Storage and Transfer

The management and storage of personal data will take place on servers located within and outside the European Union and/or third-party companies duly appointed as Data Processors. The transfer of data outside the EU is ensured through the adoption of Standard Contractual Clauses.

The list of Data Processors is available upon request at the registered office.

7. Rights of the Data Subject

The customer, in his capacity as Data Subject, has the rights set out in art. 15 of the Regulation and specifically:

1. The right to obtain confirmation as to whether or not personal data concerning them exists, even if not yet recorded, and to receive such data in an intelligible format.

2. The right to obtain information regarding:
   a. the origin of personal data;
   b. the purposes and methods of processing;
   c. the logic applied in case of processing carried out with the aid of electronic instruments;
   d. the identifying details of the owner, managers and representative;
   e. the subjects or categories of subjects to whom the personal data may be communicated or who may become aware of them in their capacity as designated representative in the territory of the State, managers or persons in charge.

3. The Data Subject has the right to obtain:
   a. a) the updating, rectification or, when there is interest, the integration of the data;
   b. b) the cancellation, transformation into anonymous form or restriction of processing of data processed in violation of the law, including data whose retention is not necessary in relation to the purposes for which the data were collected or subsequently processed;
   c. c) certification that the operations referred to in letters a) and b) have been brought to the attention, also with regard to their content, of those to whom the data have been communicated or disseminated, unless this proves impossible or involves disproportionate efforts to the right protected.

4. The Data Subject has the right to object, in whole or in part:
   a. a) for legitimate reasons to the processing of personal data concerning him/her, even if pertinent to the purpose of the collection;
   b. b) to the processing of personal data concerning him/her For purposes other than those specified in Article 2.

Also pursuant to articles 15 and following of the GDPR, the customer has the right to request at any time, access to his/her personal data, the correction or deletion of the same, the limitation of the processing in the cases specified in art. 18 of the GDPR, obtain in a structured, commonly used and machine-readable format the data concerning him/her, in the cases specified in art. 20 of the GDPR. At any time, the customer can revoke the consent given pursuant to art. 7 of the GDPR; lodge a complaint with the competent supervisory

authority pursuant to article 77 of the GDPR if he/she believes that the processing of his/her data is contrary to the legislation in force.

The customer can make a request to oppose the processing of his/her personal data pursuant to Article 21 of the GDPR, in which he/she must highlight the reasons justifying the opposition: the Data Controller reserves the right to evaluate the request, which would not be accepted in the event of the existence of compelling legitimate reasons to proceed with the processing that prevail over the interests, rights and freedoms of the user.

The Data Subject may exercise the rights referred to in the previous article at any time by sending a registered letter or an email/certified email to the addresses above.