Update to 07/10/2025

INFORMATION ON THE PROCESSING OF PERSONAL DATA
Art. 13 of Regulation (EU) 2016/679 or GDPR

Dear Customer/Supplier,

We would like to inform you that, in accordance with Article 13 of Regulation (EU) 2016/679 (GDPR), which provides provisions for the protection of individuals regarding the processing of personal data, the personal and fiscal data you provide will be processed in compliance with this legislation. This processing will adhere to the principles of lawfulness, fairness, transparency, and the protection of your privacy and rights, with particular emphasis on integrity, confidentiality, personal identity, and the right to protect your personal data. Skybackbone Engenio Srl does not require you to provide, nor do we process, any so-called "special" data. As defined by the GDPR (Article 9), this includes personal data that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as genetic data, biometric data intended to uniquely identify a natural person, and data concerning a person's health or sexual life or orientation.

Data controller

The data controller is Skybackbone Engenio Srl, with its registered office located at Via Lenin, 1, 41012 Carpi (MO), and can be contacted at email: info@skybackbone.it.

The data controller has appointed a Data Protection Officer (DPO), who can be contacted at privacy@engenio.it.

Purpose of processing

The legal basis for processing is the commercial relationship established previously, as outlined in the general terms and conditions for the supply of services, equipment, and ICT services, as required by the lawfulness of processing (Articles 6(b) and (c) of the GDPR). Data processing is carried out to activate and maintain the services subscribed to, perform the services requested, enable effective management of customer and supplier relations in order to respond to requests for information, assistance, suggestions, and/or specific needs reported by you; to fulfill the obligations provided for by laws or regulations, to protect the rights of Skybackbone Engenio Srl, and to send technical and commercial information material (newsletters).

"Data" refers to data relating to natural persons processed by Skybackbone Engenio Srl for the purpose of entering into and executing contractual relationships with its customers/suppliers, such as data relating to the legal representative of the

customer/supplier who signs the contract in the name and on behalf of the latter, employees/consultants of the customer/supplier involved in the activities referred to in the contract, the Data of the companies of the customer/supplier's group for which the latter signs the contract with the necessary powers of representation, as well as any other information necessary for the execution of the contract and/or the provision of the service(s) (also indicated below).

The source of the Data is the customer/supplier.

In particular, these Data will be processed for the purposes indicated below.

1. **Management of the contractual/commercial relationship,** such as: satisfying specific requests of the data subject prior to the conclusion of the contract; conclusion, amendments, execution of the contract; provision and management of related services (installation, activation, migration, maintenance, and/or assistance activities); management of complaints. The legal basis for the processing is: - Execution of the contract for the Data of the legal representative of the supplier/customer - Legitimate interest for the Data of the employees/consultants of the supplier/customer involved in the activities referred to in the contract. Data retention period: contractual duration and, after termination, for a further 10 years. In the event of legal disputes, for the entire duration of the dispute, until the time limits for bringing appeals have expired.
2. **Administrative and accounting purposes**, such as: invoicing; management of payments, late payments, and non-payments; for organizational, administrative, financial, and internal accounting purposes related to the aforementioned activities. The legal basis for the processing is the need to comply with a legal obligation to which Skybackbone Engenio Srl is subject. Data retention period: contractual duration and, after termination, for a further 10 years. In the event of legal disputes, for the entire duration of the dispute, until the expiry of the time limits for bringing legal action.
3. **Fulfilment of obligations or exercise of rights**: provided for by national or European Union law or by collective agreements in accordance with national law, such as: fulfilment of obligations under Community and national regulations, in particular laws, regulations, including contingent and urgent measures for the protection of public order, the investigation and prosecution of crimes. The legal basis for the processing is the need to comply with a legal obligation to which the data controller is subject. Data retention period: contractual duration and, after termination, for a further 10 years. In the event of legal proceedings, for the

entire duration of the proceedings, until the time limits for bringing legal action have expired.

4. **Extrajudicial debt collection (in the case of customers),** such as: protection and possible recovery of the debt, directly or through third parties (agencies/debt collection companies) to whom the data will be communicated solely for this purpose. The legal basis for the processing is legitimate interest. Data retention period: contractual duration and, after termination, for a further 10 years. In the event of legal disputes, the dispute shall continue for the entire duration of the dispute until the time limits for bringing legal action have expired.

5. **If necessary, to ascertain, exercise, and/or defend rights in court**. The legal basis for the processing is legitimate interest. Data retention period: duration of the contract and, after termination, for a further 10 years. In the event of legal disputes, the dispute shall continue for the entire duration of the dispute, until the time limits for bringing legal action have expired.

6. **Informative and promotional/marketing**: such as, for example, sending commercial/promotional communications (hereinafter "newsletters") via automated contact methods (such as email and text messages) and traditional methods (such as telephone calls with an operator and traditional mail) relating to the services offered by Skybackbone Engenio Srl or notification of company events, as well as conducting market research, statistical analysis, and surveys of customer satisfaction (Quality Of Service). The use of e-mail addresses provided by the customer in the context of the sale of a product or service for the direct sale of similar products or services is permitted for the purpose of sending information and newsletters with the explicit consent of the data subject. Skybackbone Engenio Srl uses the services of MailChimp, which sends the newsletter created by the Data Controller free of charge to the distribution list updated by the Data Controller. MailChimp, which is based and operates outside the EU, has certified its compliance with the EU-U.S. DPF (for information: https://mailchimp.com/it/gdpr/). Pursuant to Article 46 of the GDPR, the transfer of data to third countries is lawful thanks to the presence of standard contractual clauses that constitute an adequate condition for the transfer itself. MailChimp has signed these clauses and provided adequate guarantees on the application of appropriate security measures. Its activities are therefore considered to be subject to the same quality of supervision as would be expected of an entity operating in the EU. The data (email address, first name, and last name) will be processed to send free newsletters about our services through the MailChimp platform owned by "The Rocket Science Group LLC" (Atlanta, USA), which acts as

Data Processor and adheres to the EU-U.S. DPF agreement regulating the transfer of personal data between the European Union and the USA. This, therefore, constitutes a transfer of data outside the EU covered by adequate safeguards. The Data Protection Officer of the Data Processor can be contacted at: dpo@mailchimp.com. Mailchimp guarantees the immediate removal from the distribution list of persons who request it through the link included in each mailing. At the time of collection and when each communication is sent, the data subject is informed of the possibility of objecting to the processing at any time, easily and free of charge. To unsubscribe from the mailing list, simply click on the link provided in each newsletter or alternatively send a request to unsubscribe to info@skybackbone.it. The legal basis for processing is the consent of the data subject (optional and revocable at any time) and legitimate interest. Data retention period: until the data subject requests to unsubscribe from the promotional communication/newsletter service.

Methods of processing

Personal data is processed by the data controller and any duly authorized data processors for the proper fulfillment of the purposes indicated above using electronic tools and paper archives, as well as security measures to ensure the confidentiality of personal data and prevent unauthorized access. The data controller does not use automated processes, including profiling, to achieve the purposes set out in this policy.

Nature of provision

The provision of data is optional, however, any refusal to provide it, or failure to consent to its processing, will make it impossible for Skybackbone Engenio Srl to provide the services offered in full.

Parties to whom personal data may be disclosed

The Data may be disclosed to external parties acting as data controllers, for example, supervisory and control authorities and bodies, and, in general, public or private entities entitled to request the Data (e.g., banks and credit institutions; public administrations and other public authorities). The Data may be processed, on behalf of the data controller, by external parties designated as data processors, who perform specific activities on behalf of the data controller, such as its distribution network, companies, and agents that perform debt collection activities for the data controller, legal, tax, and administrative consultants. The Data may be processed by employees of the company departments responsible for pursuing the above purposes, who have been expressly authorized to process the Data and who have received adequate operating instructions.

Geographical scope of processing

The Data Controller does not transfer personal data to third countries; however, it reserves the right to use cloud services (e.g., MailChimp) and, in this case, the service providers will be selected from among those who provide adequate guarantees, as required by Article 46 of GDPR 2016/679.

Data retention

The personal data necessary for the provision of services will be retained until the data subject requests its deletion. In any case, the data will be processed for a period equal to the purpose of the services specified in the contractual relationship.

Profiling

We do not carry out profiling. The data is not, nor will it be, subject to any automated processing.

Rights of the data subject

By contacting the Data Protection Officer (DPO) at privacy@engenio.it or the Data Controller Skybackbone Engenio Srl at info@skybackbone.it at any time, you may exercise the following rights pursuant to Articles 15-22 of GDPR 2016/679: Access to data concerning you, its deletion, the correction of inaccurate data, the integration of incomplete data, the deletion of data, the limitation of processing in the cases provided for in Article 18 of the GDPR, as well as to object, for reasons related to your particular situation, to the processing carried out for the legitimate interest of the data controller. Furthermore, where the processing is based on consent or on a contract and is carried out by automated means, the data subject has the right to receive the Data in a structured, commonly used and machine-readable format and, where technically feasible, to transmit it to another controller without hindrance. The data subject has the right to lodge a complaint with the competent supervisory authority in the Member State in which he or she habitually resides or works or in the State in which the alleged infringement occurred. The data subject has the right to withdraw consent given at any time for marketing purposes and to object to the processing of Data processed for the same purposes. The interested party who prefers to be contacted for the aforementioned purpose exclusively through traditional means may still express their opposition to receiving communications through automated means.

Complaints

To lodge a complaint regarding the processing of their personal data, customers can contact the Italian Data Protection Authority using the following link: http://www.garanteprivacy.it/home/footer/contatti

Changes to the privacy policy

The Data Controller reserves the right to make changes to this policy at any time, giving appropriate notice to users. In order to view any changes made, users are invited to visit the website https://engenio.it/privacy-policy-3/ and to consult this policy regularly, which in any case indicates the date of the last update.