

PRIVACY POLICY

We inform the User or Visitor of our site that the Italian Legislative Decree no. 196/2003 (the so-called “Code on Personal Data Protection, hereinafter also called the “Code”) provides for the protection of physical persons with regard to the processing of personal data. In accordance with the provisions of the aforesaid Code and with the current relevant laws, the processing of data shall be governed by principles of correctness, lawfulness and transparency, respecting the basic rights and freedoms, as well as the dignity of the concerned person, with special reference to the confidentiality, personal identity and right to the protection of personal data. This information is provided pursuant to art. 13 of the Code and it is subject to updates, which shall be published on our site.

THE DATA CONTROLLER

The data controller is Aruba S.p.A. (VAT number IT 01573850516) located in Località Palazzetto n. 4, 52011 Bibbiena (AR) ITALY and, notwithstanding the relevant information note issued to the individual relating to registering “.it” domains, in accordance with Art. 29 of the Code, it may appoint one or more Data Supervisors to work under its direct authority on the basis of the instructions they receive.

PERSONS TO WHOM DATA MAY BE COMMUNICATED OR WHO MAY BECOME ACQUAINTED WITH IT IN THEIR WORKING ROLES

Data processing connected with this website services takes place on the premises of Aruba S.p.A.’s registered offices and those of its subsidiaries and associated companies, and is performed solely by personnel charged with processing tasks. The personal data provided by users who submit requests for informative and/or contact material and/or information, Internet traffic details, cookies, applications and forms are processed by Aruba S.p.a. within the context of providing the service or features requested, and will be passed on to third parties in general if necessary, as well as to suppliers and/or employees and/or companies controlled by and/or connected to Aruba S.p.a. for the purposes described below in accordance with the principles of correctness, lawfulness and transparency.

METHOD OF DATA PROCESSING

Personal data is processed by automated and non-automated means for the amount of time strictly necessary to accomplish the purposes for which it has been gathered. Specific security measures are observed to prevent loss of data, illegitimate or improper use and unauthorised access.

RIGHTS OF THE PERSON CONCERNED

The person concerned has the rights set out under Article 7 of Legislative Decree No 196 of 2003 (Right of access to personal data and other rights), as outlined below:

1. A data subject shall have the right to obtain confirmation as to whether or not personal data concerning him exist, regardless of their being already recorded, and communication of such data in intelligible form.
2. A data subject shall have the right to be informed
 - a) of the source of the personal data;
 - b) of the purposes and methods of the processing;

- c) of the logic applied to the processing, if the latter is carried out with the help of electronic means;
- d) of the identification data concerning data controller, data processors and the representative designated as per Section 5(2);
- e) of the entities or categories of entity to whom or which the personal data may be communicated and who or which may get to know said data in their capacity as designated representative(s) in the State's territory, data processor(s) or person(s) in charge of the processing.

3. A data subject shall have the right to obtain

- a) updating, rectification or, where interested therein, integration of the data;
- b) erasure, anonymization or blocking of data that have been processed unlawfully, including data whose retention is unnecessary for the purposes for which they have been collected or subsequently processed;
- c) certification to the effect that the operations as per letters a) and b) have been notified, as also related to their contents, to the entities to whom or which the data were communicated or disseminated, unless this requirement proves impossible or involves a manifestly disproportionate effort compared with the right that is to be protected.

4. A data subject shall have the right to object, in whole or in part,

- a) on legitimate grounds, to the processing of personal data concerning him/her, even though they are relevant to the purpose of the collection;
- b) to the processing of personal data concerning him/her, where it is carried out for the purpose of sending advertising materials or direct selling or else for the performance of market or commercial communication surveys.

OPTIONAL NATURE OF SUPPLYING PERSONAL DATA

We inform our Users that, except for navigation data, data communication is optional; however, a refusal may prevent Aruba S.p.a from providing a punctual and correct management of the contact request or of the service supply application submitted by the concerned party.

SECURITY OF INFORMATION

All the information collected on the website is saved and stored in secure operating environments with access limited only to authorized personnel. The Website is monitored on a regular basis to check for any violation of security, and to ensure that all the collected information is safe from unauthorized viewing. Aruba S.p.A. adopts all the security measures required by the relevant laws and regulations, and all the appropriate measures according to the latest modern standards, to ensure and guarantee the confidentiality of personal data of users, and reduce as much as possible, the dangers posed by unauthorized access, by the cancellation, loss or damage of personal data of users.

TYPE OF DATA PROCESSED, PERIOD AND PURPOSE OF THE PROCESSING

The purpose of the processing that we intend to carry out is to complete, manage and follow up contact requests or requests for the provision of services sent by the individual; to organize, manage and follow

up these contact requests and requests for the provision of services including by communicating with third parties in general, as well as suppliers and/or employees and/or companies controlled by and/or connected to them for the purposes of providing the services and/or for the protection of rights and/or to fulfil legal or regulatory obligations and at the request of the competent authorities. The data will be processed in accordance with the principles of correctness, lawfulness and transparency. The individual's personal data may be used to request information from them, including by telephone, about the quality of the services offered, or about the termination/cancellation of those services, as well as for the purposes of marketing the services in accordance with the provisions of Art. 123 of the Code, with particular reference to processing traffic data. This information may be kept for longer than the periods mentioned in Art. 123 of the Code, but only for as long as is strictly necessary to achieve the purposes for which it is kept.

DATA PROVIDED VOLUNTARILY BY USERS

The voluntary, facultative and explicit sending of data to Aruba S.p.A. by the user (for example, on registering with the Aruba S.p.A. databank or on entering data when filling in the appropriate forms, even where this has the purpose of checking whether access to the services provided is possible, as well as the sending of emails to the email addresses shown on this website), entails the acquisition of the sender's address and the data supplied by the sender, for the processing of which, the user hereby expressly issues their consent. Should users enter or in any other way process the data of third parties, the user herewith guarantees, on the assumption of any liability arising in this connection, that she/he has in advance provided these third-parties with the information referred to under Article 13 of Legislative Decree No 196 of 2003, and has obtained the third-party's consent for this processing.

DATA PROVIDED VOLUNTARILY BY USERS

FOR ADVERTISING PURPOSES

If users give their consent for their personal information to be used, to receive marketing and promotional information about Aruba's services, receive discounts, free gifts and exclusive offers, in accordance with art. 13 of the Code:

- a) The information is used to complete, manage and fulfil the request submitted by the individual to subscribe to the newsletter, and other mailing lists offered by Aruba S.p.A. for the purposes of receiving emails containing marketing and/or promotional and/or advertising information about Aruba's services; to organise, manage and fulfil the above-mentioned request to subscribe including the communication of the information to third party suppliers or companies in the Aruba Group; to fulfil legal obligations or other requirements demanded by the competent authorities.
- b) The information will be processed electronically/manually.
- c) The information collected will be used by Aruba S.p.A. for the complete, proper management of the request to subscribe to the newsletter and mailing lists and will be passed on to third parties for the protection of rights and to fulfil legal or regulatory obligations and at the request of the competent

authorities. It will be processed in accordance with the principles of correctness, lawfulness and transparency, protecting the

privacy and the rights of the individual and third parties.

The individual can at any time object to the use of their email address to receive the above-mentioned communication or to object to that information being processed. To unsubscribe from the newsletter and the mailing list, the individual can follow the cancellation procedure detailed in the marketing and/or sales and/or promotional messages sent to them.

NAVIGATION DATA

The computer systems and software procedures used to operate this website obtain, during normal usage, certain personal data the transmission of which is implicit in the use of internet communication protocols.

The personal data relates to internet traffic which, due to its nature, cannot be automatically associated to identified users, but by being processed or associated with data held by third parties, it may allow the identification of users/visitors of the website (e.g. IP addresses).

This type of data is only used for anonymous statistic information relevant to website visits or to check that such website is working correctly.

Such personal data is stored by the company Aruba S.p.A. only for as long as it is necessary and in any case in accordance with the relevant laws in force.

COOKIES

GENERAL INFORMATION, DISABLING AND MANAGING COOKIES

Cookies are data sent by the website and stored by the Internet browser on the user's computer or on any other device (e.g., a tablet or a cell phone). The aruba.it web site and the relevant sub-domains may install technical cookies and third party cookies.

In any case, the user may manage or request the general disabling or deletion of the cookies, changing the settings of his/her Internet browser. However, disabling might slow down or prevent access to certain sections of the site.

Settings to manage or disable cookies may vary according to the Internet browser used; therefore, to get more information on how to perform such operations, we recommend Users to consult the manual of the device used or the "Help" function of the Internet browser.

Find here below the links that explain how to manage or disable cookies for most popular Internet browsers:

- Internet Explorer: <http://windows.microsoft.com/it-IT/internet-explorer/delete-manage-cookies>
- Google Chrome: <https://support.google.com/chrome/answer/95647>

- Mozilla Firefox: <http://support.mozilla.org/it/kb/Gestione%20dei%20cookie>
- Opera: <http://help.opera.com/Windows/10.00/it/cookies.html>
- Safari: <https://support.apple.com/kb/PH19255>

TECHNICAL COOKIES

The use of technical cookies, which are cookies necessary to send data through the electronic communication network or cookies that the supplier needs to provide the service requested by the customer, allow safe and efficient use of our site.

Session cookies may be installed in order to enable initial and continued access to the portal reserved area as an authorized user.

Technical cookies are essential for a correct operation of our internet site, and are used to enable users to navigate normally and use the advanced services offered by our website. The technical cookies that are used can be divided into session cookies, which are stored only for the duration of the navigation and until the browser is closed; and permanent cookies, which are saved in the memory of the user's device until their expiry or until they are deleted by the user. Our site uses the following technical cookies:

- Navigation or session technical cookies, used to manage normal web navigation and the user's authentication;
- Functional technical cookies, used to save customizations selected by the user, such as the language;
- Analytics technical cookies, used to learn the way users use our website, so as to evaluate and improve its operation.

THIRD PARTY COOKIES

Third party cookies may be installed: these are analytics and profiling cookies of Google Analytics, Google Doubleclick, Criteo and Facebook. They are sent by the internet sites of the aforesaid third parties external to our site.

Third party analytics cookies are used to collect information on the users' behavior when they visit the site. The collection is performed in an anonymous way in order to improve the use of the site. Third party profiling cookies are used to create users' profiles in order to propose advertising messages consistent with the choices made by users.

The use of these cookies is governed by the rules set out by said third parties; therefore, we invite users to read the information on privacy and the instructions to manage or disable cookies published in the following web pages:

For Google Analytics cookies:

- privacy policy: <https://www.google.com/intl/it/policies/privacy/>
- instructions to manage or disable cookies: <https://support.google.com/accounts/answer/61416?hl=it>

For Google Doubleclick cookies:

- privacy policy: <https://www.google.com/intl/it/policies/privacy/>
- instructions to manage or disable cookies: <https://www.google.com/settings/ads/plugin>

For Criteo cookies:

- privacy policy: <http://www.criteo.com/it/privacy/>
- instructions to manage or disable cookies: <http://www.criteo.com/it/privacy/>

For Facebook cookies:

- privacy policy: <https://www.facebook.com/privacy/explanation>
- instructions to manage or disable cookies: <https://www.facebook.com/help/cookies/>

INFORMATION

Information and requests about privacy may be addressed to Aruba S.p.a. via:

- e-mail to: privacy@staff.aruba.it
- mail to: Aruba S.p.a., Località Palazzetto n. 4 - 52011 Bibbiena (AR) ITALY