PERSONAL DATA PROCESSING POLICY

issued pursuant to Article 13 of EU Regulation 2016/679

This notice explains how Orangedev S.r.l., acting as data controller, collects and processes the personal data of its customers and prospective customers, obtained directly or through third parties, in order to manage its relationships with customers and handle requests from prospective customers, in accordance with EU Regulation 2016/679 (the *General Data Protection Regulation*, "GDPR") and Italian Legislative Decree No. 196/2003 (the *"Italian Data Protection Code"*), as amended by Legislative Decree No. 101/2018.

Data protection law requires anyone processing personal data to inform the individuals concerned about what data is being processed and the key features of that processing, which must in any case be carried out lawfully, fairly and transparently, safeguarding your rights and privacy. We therefore provide the following information.

DATA CONTROLLER AND DATA PROTECTION OFFICER

The data controller is Orangedev S.r.l., Tax Code and VAT No. 06689280482, with registered office at Via Giovanni Pian dei Carpini, 1 – 50127 Florence, Italy. Contact details: Tel. *(+39) 095 483682*, Email: *info@orangedev.it*, Certified Email (PEC): *orangedev@legalmail.it*. You may contact the Data Protection Officer, designated by the data controller pursuant to Article 37 GDPR, at: *dpo@orangedev.it*.

PURPOSE OF PROCESSING AND LEGAL BASIS

We process your personal data to manage activities relating to entering into and performing your contract with Orangedev S.r.l., including, by way of example and not limitation: managing contracts, orders and deliveries, invoicing, consumer and user protection services, credit protection, and administrative, management, organisational and operational services connected with the contract. This processing is necessary for the performance of the contract to which you are a party, or for pre-contractual measures taken at your request, including in connection with free trial periods of Orangedev S.r.l.'s products and services made available to you by the data controller (Art. 6(1)(b) GDPR).

If you contact us through the information request forms on our websites, we process the data you provide to respond to your request and, if you wish, to prepare a quote or activate a trial period. The legal basis is the performance of pre-contractual measures taken at your request (Art. 6(1)(b) GDPR). We will only send you commercial communications if you give your consent, which is separate and optional, as described below.

Your data may also be processed by the data controller to comply with obligations set out in laws and regulations, EU legislation, or measures issued by public authorities. The legal basis for this processing is the need to comply with a legal obligation to which the data controller is subject, pursuant to Article 6(1)(c) GDPR.

Processing may also be necessary to protect, in or out of court, rights arising from the contract; in this case, the legal basis for processing lies in the data controller's legitimate interest, pursuant to Article 6(1)(f) GDPR.

Finally, the personal data you provide may be processed to carry out marketing and promotional activities relating to Orangedev S.r.l.'s products and services, as well as for commercial communications sent by both automated means (e.g. SMS, email) and traditional means (e.g. phone, post). In this specific case, processing will only take place with your explicit consent, pursuant to Article 6(1)(a) GDPR. You are free to give such consent in the manner indicated by the data controller: this choice is entirely optional, and any consent given may be withdrawn at any time. Emails we

send you may contain tracking pixels, used – again on the basis of your consent – to measure opens and link clicks, as described in the section "Tracking pixels in email communications". You may withdraw your consent at any time, or withdraw it for tracking only, in which case you will continue to receive our communications.

In accordance with Article 22(1) GDPR, in none of the cases described above will your personal data be subject to decisions based solely on automated processing, including profiling as defined in Article 4(4) GDPR.

NATURE AND SOURCE OF THE DATA PROCESSED

In connection with the above purposes, and to properly carry out its activities, the data controller may process – by way of example and not limitation – your data belonging to the following categories.

- *Personal data:* identification and personal details, contact details, payment data, and residential/domicile addresses.
- *Email interaction data:* message opens, date and time, link clicks, IP address, and device and email client type, collected through tracking pixels with your consent, except in the cases described in the section "Tracking pixels in email communications".

CATEGORIES OF RECIPIENTS

Aside from any disclosures required to comply with legal obligations, the data we collect and process will only be shared, for the purposes described above, with the following categories of recipients:

- employees and collaborators of the data controller responsible for managing customer relationships and related activities, who are expressly authorised and trained pursuant to Article 2-quaterdecies of Legislative Decree No. 196/2003 and Article 29 GDPR, and who receive explicit instructions from the data controller on how your data must be handled;
- third parties appointed as data processors under Article 28 GDPR, with whom the data controller has entered into agreements governing the processing of your data, and to whom specific written instructions on data handling are provided.

By way of example and not limitation, this latter category includes consultants engaged by the data controller to manage compliance obligations under applicable law and to provide the technical and administrative support connected with, and instrumental to, the correct performance of the contract entered into. The complete, up-to-date list of recipients – i.e. the data processors appointed under Article 28 GDPR – is available at the data controller's offices, or on specific and reasoned request to the data controller.

Your personal data will never be disseminated or made publicly available.

HOW AND WHERE YOUR DATA IS PROCESSED

For the purposes described above, your personal data may be processed and stored in both paper and electronic form, on company servers or third-party servers located within the European Economic Area (EEA). The data controller does not directly transfer personal data to third countries or international organisations. The providers we use, including cloud service providers and the provider of our email sending platform, may in turn use sub-processors established outside the EEA: in that case, data is only transferred on the basis of a European Commission adequacy decision (Art. 45 GDPR) or appropriate safeguards, such as standard contractual clauses (Art. 46 GDPR). Information on the

safeguards adopted can be requested from the data controller or the Data Protection Officer at the contact details given above. For data collected through tracking pixels in email communications, please see the relevant section regarding any transfers made by the sending platform provider.

DATA RETENTION PERIOD

Your data will be stored and archived, as described above, for the time strictly necessary to achieve the purposes described above, without prejudice to any specific retention obligations that by their nature continue to apply under current legislation and as set out in the data controller's Records of Processing Activities. In the event of litigation, your data will be processed for the entire duration of the proceedings, until the time limits for bringing any appeal have expired. Further information on data retention periods can be requested from the data controller with a specific and reasoned request.

Data relating to information requests that do not lead to a contract is kept for 24 months from the last contact. If you have consented to commercial communications, the data needed to send them is kept until you withdraw your consent.

TRACKING PIXELS IN EMAIL COMMUNICATIONS

This information is also provided pursuant to Article 122 of Legislative Decree No. 196/2003 and the Guidelines of the Italian Data Protection Authority (Garante per la protezione dei dati personali) on the use of tracking pixels in email communications (decision No. 284 of 17 April 2026).

What they are. Some emails we send you contain a tracking pixel: a very small, usually transparent image that is not contained in the message but hosted on a remote server. When you open the email and your email client downloads the images, a request is automatically sent to the server hosting the pixel, and the data controller thus learns that the message has been opened. Links in the message may also be tracked to record clicks. The pixel does not read the content of your emails or any other data on your device.

Data collected. The following may be collected through pixels and tracked links:

- whether the message has been opened, the date and time and the number of opens;
- clicks on links contained in the message;
- the IP address and the data inferred from it: approximate location and time zone;
- the type of device, the operating system and the email client or browser used;
- an identifier of the message and of the recipient.

Purposes and legal bases. The data is processed for the following purposes:

- individual measurement of opens and clicks on newsletters and commercial communications, to assess and improve their content, subject line and frequency: *the legal basis is your consent* (Art. 122 of Legislative Decree No. 196/2003 and Art. 6(1)(a) GDPR), which is optional and can be withdrawn at any time, including for tracking only;

- security and authentication emails (for example account activation, password change, replies to requests to exercise your rights): the processing *does not require consent*, as it is necessary for the security of the service requested.

Open and interaction data is not used for profiling purposes or for decisions based solely on automated processing.

Sending platform and recipients. Email communications are sent through the 4Dem platform (Positive User) of Positive Group Italia S.r.l. (VAT No. 10351260012), with registered office at Via San Quintino 3, 10121 Turin, Italy, which processes the data on behalf of the data controller as a processor pursuant to Article 28 GDPR. The platform is hosted on servers located within the European Union, and data relating to email communications and their tracking is not transferred outside the European Economic Area. The data is not disseminated or disclosed to third parties for their own purposes.

Retention. Open and click data relating to an individual recipient is kept for 180 days from collection, after which it is automatically deleted by the sending platform, including the history visible in the contact record; campaign reports only retain aggregate figures that cannot be traced back to individual recipients. Withdrawal of consent to tracking stops data collection from the next mailing; the individual data already collected is no longer used and is automatically deleted when the same period expires, without prejudice to your right to request its earlier erasure pursuant to Article 17 GDPR. Records of consent and its withdrawal (date and time, collection channel and version of the privacy notice) are kept for the entire duration of the processing and for 5 years after consent is withdrawn or processing ends, for evidential purposes (Art. 7(1) GDPR) and to protect the data controller's rights.

How to manage your choices. At the bottom of every email you will find the link to manage your preferences, which allows you at any time to:

- disable tracking only: you will continue to receive our communications as usual, but from the first mailing after your choice, opens and clicks will no longer be recorded (links will keep working normally);
- unsubscribe: you will no longer receive our communications.

You can make the same choices by writing to info@orangedev.it or dpo@orangedev.it. Refusing or withdrawing consent to tracking does not limit the service in any way and does not affect the lawfulness of processing carried out before withdrawal. You can also prevent pixels from loading by setting your email client not to download images automatically or to display messages as plain text.

SOFTWARE-AS-A-SERVICE

With regard to the provision of its software on a SaaS basis, Orangedev S.r.l. acts as a data processor pursuant to Article 28 GDPR, as well as system administrator under the decision of the Italian Data Protection Authority of 27 November 2008, *"Measures and arrangements applying to the controllers of processing operations performed with the help of electronic tools in view of committing the task of system administrator"*, as amended by the decision of 25 June 2009.

NATURE OF THE DATA PROVIDED AND CONSEQUENCES OF REFUSAL

Providing your data is necessary to achieve the purposes described above. Any refusal to provide it, in whole or in part, may therefore make it impossible for the data controller to ensure that the processing is carried out appropriately.

RIGHTS OF THE DATA SUBJECT

As a data subject, subject to a preliminary assessment of their applicability, you may exercise the rights set out in Articles 15 to 22 GDPR. In particular, you may exercise:

- the right of *access (Art. 15)*: the right to obtain confirmation from the data controller as to whether personal data concerning you is being processed and, where that is the case, to access that data;
- the right to *rectification or completion (Art. 16)*: the right to obtain, without undue delay, the rectification and/or completion of inaccurate or incomplete personal data concerning you;
- the right to *erasure (the "right to be forgotten", Art. 17)*: the right to obtain, without undue delay, the erasure of personal data concerning you;
- the right to *restriction of processing (Art. 18)*: where applicable, the right to obtain restriction of processing;
- the right to be notified of any rectification, erasure or restriction of processing *(Art. 19)*;
- the right to *data portability (Art. 20)*: where applicable, the right to receive the personal data you have provided to the data controller in a structured, commonly used, machine-readable format, and to transmit that data to another data controller without hindrance from the data controller to which it was originally provided;
- the right to *object (Art. 21)*: the right to object at any time, on grounds relating to your particular situation, to the processing of personal data concerning you carried out under Article 6(1)(e) or (f) GDPR, including profiling based on those provisions;
- the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you *(Art. 22)*.

You may exercise the rights listed above at any time by contacting the data controller and its Data Protection Officer at the contact details given in this notice. You may also withdraw your consent at any time, including for email tracking only, without affecting the lawfulness of processing based on consent before its withdrawal (Art. 7(3) GDPR).

Finally, pursuant to Article 77 GDPR, and without prejudice to any other administrative or judicial remedy, if you believe that the processing of data concerning you infringes the GDPR, you have the right to lodge a complaint with the Italian Data Protection Authority (Garante per la protezione dei dati personali), following the procedure described on its website: www.gpdp.it.