This notice is intended to inform you about the processing of the personal data that you voluntarily provide, in compliance with the applicable personal data protection legislation. This notice is provided pursuant to the European General Data Protection Regulation (also referred to as the **"GDPR"**) and the applicable Italian legislation (hereinafter collectively referred to as the **"Applicable Legislation"**).
This notice may be amended, supplemented and/or updated, including as a result of changes to the applicable personal data protection legislation.

1. **Data Controller.**

The Data Controller is Alps Blockchain S.p.A., with registered office at Vicolo Liceo 1, 38122 Trento (TN), Italy, Italian tax code and VAT number 02515120224, Trento Economic and Administrative Index (REA) no. TN-230317 (hereinafter also the **"Data Controller"** or simply the **"Controller"**).
For any clarification or information, or to exercise the rights set out in this Privacy Notice, the Data Controller may be contacted at the following details: tel. +39 333 2663836, email: amministrazione@alpsblockchain.com, certified email (PEC): info@pec.alpsblockchain.com.

2. **Purposes and legal bases of processing.**

The Data Controller collects and processes data relating to the supplier and the identification and contact details of the natural persons acting in the name and on behalf of the supplier and/or in its interest (hereinafter, respectively, the **"Data"** and the **"Data Subjects"**) for the purposes and on the legal bases set out below.

	PURPOSE	LEGAL BASIS
a.	Manage the pre-contractual relationship; manage and perform the contract and all related activities.	The processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the data subject's request prior to entering into a contract [Article 6(1)(b) GDPR].
b.	Comply with administrative, accounting and/or tax obligations relating to the contract (for example, issuing invoices) and with any further legal obligations to which the Data Controller is subject, including those under the applicable personal data protection legislation.	The processing is necessary for compliance with a legal obligation to which the Data Controller is subject [Article 6(1)(c) GDPR].
c.	Establish, exercise or defend a legal claim in administrative, judicial or out-of-court proceedings, or whenever administrative or judicial authorities act in their official capacity.	The processing is necessary for the purposes of the Data Controller's legitimate interest in establishing, exercising or defending a legal claim in administrative, judicial or out-of-court proceedings, or whenever administrative or judicial authorities act in their official capacity [Article 6(1)(f) GDPR].

3. **Data retention period.**

The Data will be retained for no longer than is necessary to pursue the purposes specified above and, in any event, for no longer than the following maximum retention periods:

- for the entire term of the contract and for a maximum of ten years thereafter, and in any event in compliance with the minimum retention periods prescribed by law, for the purposes specified in points a. and b. of the preceding table;
- for no longer than is necessary to establish any potential liability and/or respond to requests from the authorities, for the purposes specified in point c. of the preceding table.

4. **Nature of the provision of Data.**

The provision of the Data is necessary to enter into the contract and comply with contractual and legal obligations. Accordingly, any refusal to provide all or part of the Data may make it impossible for the Data Controller to enter into and/or perform the contract.

5. **Methods of processing the Data.**

The Data will be processed manually and/or by electronic means in accordance with the principles of lawfulness, purpose limitation, data minimisation and storage limitation, using appropriate technical and organisational security measures to protect the Data against unauthorised or unlawful access, destruction, and accidental loss of integrity or confidentiality. In carrying out internal management and organisational activities, the Data Controller may use artificial intelligence tools to support its processes. These tools operate under the constant supervision of authorised personnel and are never used to make decisions based solely on automated processing that produce legal effects concerning the data subject or similarly significantly affect them. The Data are therefore not subject to any fully automated decision-making process or profiling within the meaning of Article 22 of the GDPR.

6. **Recipients of the Data.**

The processing is carried out by personnel of the Data Controller who are specifically authorised on the basis of their respective duties, as well as by processors specifically appointed in writing, within the scope of their respective functions and in accordance with the Data Controller's instructions. Appropriate measures are used to ensure the security and confidentiality of the processed Data. A list of processors is available upon request.

The Data may also be disclosed to the following categories of recipients:

- insurance service providers and banks and/or postal-service providers supplying services that support the purposes described above;
- software support companies and, more generally, IT service providers;
- law firms, professional practices, consultants or professionals (for example, legal advisers or accounting firms) appointed to support the Data Controller in properly complying with its legal obligations and/or in establishing, exercising or defending a legal claim in judicial or out-of-court proceedings, or whenever judicial or administrative authorities act in their official capacity;
- persons, entities or public authorities to which the Data must be disclosed, in their capacity as independent data controllers, pursuant to a legal provision or an order issued by those authorities.

7. **Transfers to third countries or international organisations.**

The Data are processed within the European Economic Area (EEA). The Data Controller does not transfer the Data to third countries or international organisations. Should a transfer outside the EEA become necessary for technical or organisational reasons, it will take place only to countries ensuring an adequate level of protection under Article 45 of the GDPR or subject to appropriate safeguards under Article 46 of the GDPR (in particular, standard contractual clauses adopted by the European Commission). The data subject may obtain a copy of those safeguards by contacting the Data Controller at the details provided above.

8. **Rights of the data subject.**

The individual to whom the Data relate, in their capacity as data subject, may exercise the rights listed below by submitting a request to the Data Controller using the contact details provided in paragraph 1 above:

- obtain confirmation as to whether or not personal data concerning them are being processed and, where that is the case, obtain access to the data and relevant information, together with a copy of the personal data undergoing processing;
- request and obtain the updating of personal data, the rectification of inaccurate data or the completion of incomplete data;
- request and obtain the erasure of personal data where: a) the data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; b) the data subject objects to processing based on the Data Controller's legitimate interests and there are no overriding legitimate grounds for continuing the processing; c) the data have been unlawfully processed; or d) the Data Controller is required to erase the data in order to comply with a legal obligation;
- request and obtain restriction of processing where: a) the accuracy of the data is contested, for the period required by the Data Controller to carry out the necessary checks; b) the Data Controller's processing is unlawful and the data subject opposes erasure and requests restriction of their use instead; c) the data are required by the data subject for the establishment, exercise or defence of a legal claim, although the Data Controller no longer needs them for processing purposes; or d) verification is pending as to whether the Data Controller's legitimate grounds override those of the data subject;
- where data have been rectified or erased or processing has been restricted, have such rectification, erasure or restriction communicated to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort;
- where processing is based on a contract and carried out by automated means, request and receive the personal data concerning them in a structured, commonly used and machine-readable format and, where technically feasible, have those data transmitted directly by the Data Controller to another controller;
- object, in whole or in part, on legitimate grounds relating to their particular situation, to the processing of personal data concerning them, even where relevant to the purpose of collection;
- lodge a complaint with the Italian Data Protection Authority under Article 77 of the GDPR or seek an appropriate judicial remedy if they consider that the processing of personal data concerning them infringes the GDPR. The Italian Data Protection Authority is located at Piazza Monte Citorio 121, Rome, Italy; fax: (+39) 06 69677 3785; telephone: (+39) 06 696771; email: garante@gpdp.it; certified email (PEC): protocollo@pec.gpdp.it.