



**INFORMATION PURSUANT TO ARTICLES 13 AND 14 OF EUROPEAN REGULATION 679/2016
FOR THE USE OF THE CIAS ELETTRONICA S.r.l. APP.**

European Regulation 27/4/2016 no. 679 protects personal data and regulates its processing, which must be based on principles of fairness, lawfulness, transparency, necessity, proportionality, and minimization, in order to protect your privacy and your rights related to the processing itself.

In accordance with current national and European legislation, we therefore provide you with the following information:

1. Legal basis for processing, purposes and methods of data processing, consent to data processing

The legal basis for the processing of your personal data can be found in the following cases provided for in Article 6 of European Regulation 679/2016:

- letter b) (i.e., processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract);
- letter c) (i.e., processing is necessary for compliance with a legal obligation to which the controller is subject);
- letter f) (i.e., processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party).

Consent to the processing of data is considered to have been validly given in a clear and precise manner at the time of registration (through the creation of an account) on the CIAS ELETTRONICA S.r.l. app.

Your personal data provided at the time of registration will be processed exclusively for purposes strictly connected and instrumental to the operation of the application, the consequent fulfillment by CIAS ELETTRONICA S.r.l. of the obligations assumed with the provision of the app, with the consequent requests uploaded by the user and with the negotiation of the time required for the provision of the assistance and/or consulting and/or technical support service.

Therefore, CIAS ELETTRONICA S.r.l. - as the owner of the application - will process the personal data provided at the time of registration for operational purposes related to the app, as explained in the Terms and Conditions of Use, and in particular for:

1. verify the user's legitimacy to use the app and uniquely link the account created (with the related wallet) to the registered user;
2. identify the user for the purpose of better managing reports of service disruptions, malfunctions, faults, and defects in products and solutions distributed and/or sold by CIAS ELETTRONICA S.r.l.;
3. allow the user, once identified, to receive assistance and be able to constantly monitor the processing of each report;
4. communicate with the user via chat to provide support;
5. formalize the purchase of assistance/consultancy minutes and be able to issue the relevant invoice;
6. allow the user confidential and dedicated access to technical solutions and/or documents and/or price lists;
7. manage the various stages of the RMA and/or assistance request process in a fully electronic, immediate, and intuitive manner;
8. fulfill the obligations set forth by civil, fiscal, and tax laws, regulations, and EU legislation.



CIAS ELETTRONICA S.r.l. will ask you to enter only data relevant to the activities connected with the operation of the app and/or the subject of the contract concluded with the user at the time of registration.

Personal data will be processed on paper and electronically by the Data Controller, the data processor(s) and authorised persons/third parties, in compliance with all precautionary measures to ensure security and confidentiality and in accordance with technical and organisational measures to ensure a level of security appropriate to the risk of processing.

No technology for tracking and identifying the user's location based on IP address or other means is applied to the CIAS ELETTRONICA S.r.l. app.

2. Nature of data collection, consequences of failure to provide data, duration of processing

The provision of your personal data is mandatory in order to fulfill the obligations arising from the contract and, in general, to comply with legal requirements.

Failure to provide such data will make it impossible to use the services and operations made available by CIAS ELETTRONICA S.r.l. through the app.

The mandatory data fields are marked with an asterisk and are strictly necessary for the creation of a user account.

Once processing for the purposes indicated in paragraph 1 has ceased, your data will be stored in compliance with legal obligations for 10 years.

In the event of your voluntary unsubscription and/or account cancellation, or in the event that CIAS ELETTRONICA S.r.l. should suspend your account for the reasons set out in the Terms and Conditions of Use, the identification data related to your account will be stored for a maximum period of 10 years in order to allow for the correct accounting of the remaining credit (also due to the possibility of re-accessing the remaining credit in the event of subsequent re-registration) and to be able to define the administrative process for deleting the content linked to the account.

3. Communication and dissemination of data

Your personal data may be disclosed for the purposes of performing the app and the underlying contract:

- to suppliers and/or collaborators/partners involved in the processes of resolving reports and/or requests for assistance and/or technical support;
- to the app administrator, as well as to persons appointed by the latter to verify the functionality of the app and verify compliance with the contractual rules set out in the Terms and Conditions of Use
- to partner companies managing online payments, for the sole purpose of finalizing the payments themselves;
- to collaborators and employees within the scope of their duties, specifically appointed as authorized data processors;
- to law enforcement agencies, the judiciary, and supervisory bodies for the verification of unlawful and illegal situations and for the identification of any crimes and those responsible.

The data collected may also be transferred to the Data Controller's foreign partners, natural and/or legal persons, or to other companies in third countries belonging to the same business group as the Data Controller, as well as to consulting firms, used and identified as Data Processors.

4. Rights of the data subject

At any time, you may exercise your rights as a data subject with regard to the Data Controller pursuant to Article 15 of European Regulation 679/2016, which we summarize below:

1. The data subject has the right to obtain confirmation of the existence or otherwise of personal data concerning him/her and its communication in an intelligible form.
2. The data subject has the right to obtain information:
 - the origin of the personal data;
 - the purposes and methods of processing;
 - the logic applied in the case of processing carried out with the aid of electronic instruments;
 - the identification details of the data controller and any data processors;
 - the subjects or categories of subjects to whom the personal data may be communicated or who may become aware of it in their capacity as designated representative in the territory of the State or outside the territory of the State, data processors, or persons in charge of processing.
3. The data subject has the right to obtain:
 - updating, rectification, or, where interested therein, integration of the data;
 - the deletion, transformation into anonymous form, or blocking of data processed in violation of the law, including data that does not need to be stored for the purposes for which it was collected or subsequently processed, unless the processing is necessary for the fulfillment of a legal obligation that requires processing under Union or Member State law to which the data controller is subject;
 - certification that the operations referred to in point 3) have been brought to the attention, also with regard to their content, of those to whom the data have been communicated, except in the case where this proves impossible or involves a manifestly disproportionate effort compared to the right being protected.
4. The data subject has the right to object, in whole or in part:
 - for legitimate reasons, to the processing of personal data concerning him/her, even if pertinent to the purpose of collection, without prejudice to the possible consequences referred to in paragraph 2, subparagraph.

The above rights may be exercised by sending a request to the Data Controller, even through a designated representative, which will be answered without delay.

The request addressed to the Data Controller may also be sent by registered letter to CIAS ELETTRONICA S.r.l., with registered office in Milan, Via Durando no. 38, or, preferably, to ensure a more timely response, by sending an email to info@cias.it or a certified email to cias.elettronica@pec.it.

5. Termination and duration of processing

In the event of termination of processing for any reason, your data will be:

- **a)** distrutti, decorsi gli obblighi di conservazione imposti dall'art. 2220 c.c., dagli artt. 19 e 22 del D.P.R. n. 600/1973 (anni 10) o da altra normativa specifica;
- **b)** ceduti ad altro titolare, purché destinati ad un trattamento in termini compatibili per i medesimi scopi, per i quali i dati sono raccolti (procedure pre/fallimentari e similari o affini, cessioni di azienda o di ramo di azienda; incorporazione per fusione, etc..) ai sensi dell'art. 6, comma 1, lett. b) Reg. Eur. 679/2016;



- c) deleted in accordance with the timetable set out in paragraph 2.

6. Data Controllers and Data Processors

The data controller is: CIAS ELETTRONICA S.r.l., with registered office in Milan, Via Durando no. 38 (PEO: info@cias.it; PEC: cias.elettronica@pec.it; tel. 02/3767161).

The list of external data processors can be requested directly from the data controller.

Reading this policy is a prerequisite for registering on the CIAS ELETTRONICA S.r.l. app.

For a more detailed examination of the subject, please refer to European Regulation 679/2016, as well as Italian legislation.

Please do not hesitate to contact CIAS ELETTRONICA S.r.l. for any questions and/or clarifications regarding this policy.

Milan, October 15, 2025

The Data Controller

CIAS ELETTRONICA S.r.l.