TTS WEBSITE PRIVACY POLICY

This is a privacy notice provided pursuant to Article 13 of the European General Data Protection Regulation ("**GDPR**"). This page describes how the data of any natural person who browses or uses the services offered by this website ("**Data Subject or User**") is processed, or who accesses the following addresses electronically:

https://www.ttsystem.com and the subdomain https://reservedarea.ttsystem.com

associated with the main domain ("Website").

The purpose of this document is to provide, in a simple and straightforward manner, all the useful and necessary information to enable the User to provide their personal data in a fully informed manner and, at any time, to request and obtain clarification and/or corrections.

1. About us and who to contact

The **Data Controller** is TTS Cleaning S.R.L., with registered office at Viale dell'Artigianato, 12-14 - 35010 - Santa Giustina in Colle (PD), tax code and VAT number 04848390284.

Contact email address: privacy@ttsystem.com

2. Why this privacy notice exists and who it is intended for

The Data Controller is committed to respecting the identity and dignity of every human being and the fundamental freedoms guaranteed by the Constitution with regard to the processing of personal data and the free movement of such data. This commitment will be consistently upheld by the Data Controller in accordance with the principle of accountability, by consistently implementing appropriate technical and organisational measures and suitable policies to ensure, and be able to demonstrate, that processing is carried out in accordance with the GDPR.

This privacy notice is intended for Users of the Website. Access to certain sections of the Website and/or any requests for information or services made by users may be subject to the provision of Personal Data, which will be processed in accordance with the GDPR.

In order to use specific services on the Website, the data subject will be informed by means of this privacy notice and, where required, specific consent to the processing of personal data will be sought.

This privacy policy applies solely to this Website and not to any other websites accessed by users via links that may appear on this Website.

3. Categories of Data and Processing Operations

Browsing data

I sistemi informatici e le procedure software preposte al funzionamento di questo portale acquisiscono, nel loro normale esercizio e per la sola durata della connessione, alcuni dati personali la cui trasmissione avviene implicitamente nell'utilizzo dei protocolli di comunicazione Internet. Tali informazioni non vengono raccolte con lo scopo di associarle agli interessati identificati ma, per loro stessa natura, potrebbero, attraverso elaborazioni ed associazioni con dati detenuti da terzi, permettere di identificare gli utenti visitatori (ad es. indirizzi IP), i nomi di dominio dei terminali utilizzati, gli indirizzi in notazione URI (Uniform Resource Identifier) dei richiedenti, l'orario delle richieste, ecc. Questi dati, cancellati immediatamente dopo l'elaborazione, vengono utilizzati al solo scopo di ricavare informazioni statistiche anonime sull'uso del Sito e per controllarne il corretto funzionamento. Nessun dato derivante dal servizio verrà comunicato o diffuso.

Data processing

The processing will be carried out using both manual and computerised and telecommunications-based means, in accordance with the regulations in force and the principles of fairness, lawfulness, transparency, relevance, completeness and proportionality, data minimisation and accuracy, and using organisational and processing methods strictly related to the purposes pursued and, in any event, in such a way as to ensure the security, integrity and confidentiality of the data processed, in accordance with the organisational, physical and logical measures provided for by the applicable regulations. These measures will be implemented and enhanced on a case-by-case basis, taking into account technological developments, in order to ensure the confidentiality, availability and integrity of the data processed.

4. Purposes of processing, legal bases and retention periods

a. **The User's browsing data** is used solely for the purpose of obtaining statistical information on the use of the Portal, including electronic identification data (IP address, location, cookies, browser, etc.); The legal basis is as follows: legitimate interest under Article 6(f) and Recital 47: processing is necessary for the purposes of the legitimate interests pursued by the data controller or by a third party, provided that such interests are not overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, taking into account the reasonable expectations of the data subject based on their relationship with the data controller. Activities strictly necessary for the functioning of the Website and the provision of the browsing service on the platform. The data retention period is directly linked to the duration of the browsing session. For information on browsing, please see the cookie policy. With the exception of what is specified regarding browsing data (which is necessary to enable navigation of the Website), the User is free to provide Personal Data.

b. **The contact details** provided directly by the User (first name*, surname*, email address*, preferred language*, town, country and message text*) are processed solely for the purpose of following up on the User's enquiries and responding to contact requests. The legal basis lies in the pre-contractual or contractual obligations associated with responding to enquiries from the data subject or with the provision of a service, as well as in the legal obligations to which the Data Controller is subject. In this case, the

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principle of data minimisation will apply and the data will be retained for no longer than 10 years from the date on which the contact enquiries were dealt with, which corresponds to the statutory limitation periods.

c. **Newsletter distribution**. The data provided by the User (first name, surname, email address, language and country) is processed for the purpose of sending communications relating to events, functions and the promotion of products and services. The legal basis for sending newsletters is the prior, express consent of the data subject. Such communications may contain promotional, commercial and advertising material, or information relating to events and initiatives, sent by the data controller via automated means such as email, fax, SMS or other types of messages, as well as via telephone calls made by an operator (including automated calls), post and other informational material. The sole consequence of not giving your consent for these specific purposes is that we will be unable to carry out communication activities by sending promotional messages or newsletters. As provided for in the GDPR, where the data subject has given consent to the processing of personal data for one or more of the purposes for which it was requested, they may, at any time, withdraw that consent in whole and/or in part without affecting the lawfulness of the processing based on the consent given prior to the withdrawal. The procedure for withdrawing consent is very simple and straightforward: simply contact the Data Controller using the contact details provided in this Privacy Notice. In addition to the above, and for the sake of simplicity, should the Data Subject find themselves receiving emails sent by the Data Controller that are no longer of interest, they need only click on the 'unsubscribe' button at the bottom of the email to stop receiving any further communications, including via other contact channels for which consent had been given. Please note that the data provided may be processed to safeguard the data controller's legitimate interests, including the defence of legal claims. The data provided for the purposes set out above will be retained for as long as is necessary for those purposes and, in any event, until the data subject withdraws their consent.

d. **Client Portal Login**. This service is dedicated exclusively to the Data Controller's customers who log in to authenticate themselves and access their dedicated portal—for example, to view products, prices, purchase history, all orders (including pending ones), invoice and delivery note (DDT) lists, and any other useful resources for the Controller's customers. Customers may also request the generation of customised price lists and/or general price lists. For contact management and communication distribution, the Data Controller uses the HubSpot CRM service provided by HubSpot, Inc., specifically:

Purpose: Management of databases for contacts, leads, and customers; email management and interaction tracking.

Processing method: Data is processed in accordance with the provisions specified in HubSpot's Privacy Policy.

Place of processing: The servers used for data storage are located within the European Union, ensuring compliance with GDPR data hosting requirements.

Data Processing Agreement (DPA): The relationship is governed by HubSpot's Data Processing Agreement, which ensures high standards of personal data protection, available at: https://legal.hubspot.com/dpa

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5. Automated decision-making

The Data Controller declares that it does not make decisions that are likely to affect the Data Subject based solely on the automated processing of Personal Data. All decision-making processes associated with the purposes of processing described above are carried out with human intervention.

6. Disclosure of personal data

The personal data processed will be known exclusively to those expressly authorised to do so by the Data Controller; alternatively, it may be shared with recipients who will process the data in their capacity as data processors pursuant to Article 28 of the GDPR or as independent data controllers.

Specifically, the data will be shared with: parties providing services for the management of the information system and telecommunications networks, including email and newsletters, and who manage the website used by the Data Controller; third parties collaborating with the Data Controller on communication activities; and competent authorities for the fulfilment of legal obligations and/or provisions issued by public bodies.

It is understood that the data processed will be exclusively that necessary to achieve the specific purpose; consequently, data processed through third parties will be limited to that specific purpose.

Personal Data will not be disclosed.

7. International transfers of personal data

Personal Data will be processed by the Data Controller within the territory of the European Union. For technical and/or operational reasons, the Data Controller relies on entities located outside the European Union (specifically in the USA); such transfer solely concerns IP addresses used by Tracking Tools (e.g., cookies, unique identifiers, etc.) that enable user tracking—for instance, by collecting or storing information on the User's device—as further detailed in the Cookie Policy of this Website. The Processing will be governed in accordance with the provisions of Chapter V of the GDPR. Therefore, all necessary precautions will be taken to ensure the utmost protection of Personal Data, basing such transfer on: (i) adequacy decisions issued by the European Commission regarding the recipient third countries; (ii) appropriate safeguards provided by the third-party recipient pursuant to Article 46 of the GDPR; or (iii) the adoption of binding corporate rules.

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8. Rights of the Data Subject and Exercise thereof

As provided for by Article 15 of the GDPR, the Data Subject may access their Personal Data, request its rectification and updating if incomplete or inaccurate, request its erasure if the collection occurred in violation of any applicable law or the GDPR, and object to the Processing on legitimate and specific grounds. In particular, the rights that the User may exercise against the Data Controller at any time are as follows:

Right of access: the right, pursuant to Article 15(1) of the GDPR, to obtain from the Data Controller confirmation as to whether or not Personal Data concerning them are being processed, and where that is the case, to obtain access to the Personal Data and the following information: a) the purposes of the Processing; b) the categories of Personal Data concerned; c) the Recipients or categories of Recipients to whom the Personal Data have been or will be disclosed, in particular Recipients in third countries or international organisations;d) where possible, the envisaged period for which the Personal Data will be stored, or, if not possible, the criteria used to determine that period;e) the existence of the right to request from the Data Controller rectification or erasure of Personal Data or restriction of Processing of Personal Data concerning the Data Subject or to object to such Processing;f) the right to lodge a complaint with a supervisory authority;g) where the Personal Data are not collected from the Data Subject, any available information as to their source;h) the existence of automated decision-making, including profiling referred to in Article 22(1) and (4) of the GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such Processing for the Data Subject.

Right to rectification: in accordance with Article 16 of the GDPR, you have the right to have any Personal Data that is inaccurate rectified. Furthermore, taking into account the purposes of the processing, you may request that any Personal Data that is incomplete be supplemented, including by providing a supplementary statement.

Right to erasure: in accordance with Article 17(1) of the GDPR, you may request the erasure of your Personal Data without undue delay, and the Data Controller shall be obliged to erase your Personal Data if any one of the following grounds applies: a) the Personal Data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; b) you have withdrawn the consent on which the processing of the Personal Data is based and there is no other legal basis for such processing; c) you have objected to the processing pursuant to Article 21(1) or (2) of the GDPR and there are no longer any overriding legitimate grounds for continuing to process the Personal Data; d) the Personal Data has been processed unlawfully; e) it is necessary to erase the Personal Data in order to comply with a legal obligation under EU or national law. In certain cases, as provided for in Article 17(3) of the GDPR, the Data Controller is entitled not to erase the Personal Data where their processing is necessary, for example, to comply with a legal obligation, for reasons of public interest, for archiving purposes in the public interest or for statistical purposes, or for the establishment, exercise or defence of a right in court.

Right to restriction of processing: you may obtain restriction of processing, in accordance with Article 18 of the GDPR, where any of the following circumstances apply: a) you have contested the accuracy of the Personal Data (the restriction shall remain in place for the period necessary for the Data Controller to verify the accuracy of such Personal Data); b) the processing is unlawful but you have objected to the erasure of the personal data, requesting instead that its use be restricted; c) although the Data Controller no longer requires the personal data for the purposes of the processing, the personal data is required for the establishment, exercise or defence of legal claims; d) you have objected to the processing pursuant to Article 21(1) of the GDPR and are awaiting verification as to whether the Data Controller's legitimate grounds override those of the data subject. Where processing is restricted, the Personal Data will be processed (we will inform the User

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before such restriction is lifted) – save for storage purposes – only with the Data Subject's consent, or for the establishment, exercise or defence of legal claims, or to protect the rights of another natural or legal person, or for reasons of substantial public interest.

Right to data portability: The Data Subject may, at any time, request and receive, in accordance with Article 20(1) of the GDPR, that all Personal Data be processed by the Data Controller in a structured, commonly used and machine-readable format, or request that it be transmitted to another data controller without undue difficulty. In this case, it shall be the Data Subject's responsibility to provide us with the full and accurate details of the new data controller to whom they intend to transfer the Personal Data, by providing us with written authorisation.

Right to object: in accordance with Article 21(2) of the GDPR, the User may object at any time to the processing of Personal Data where such data is processed for marketing purposes, including profiling insofar as it relates to direct marketing.

Right to lodge a complaint with the supervisory authority: without prejudice to the right to seek redress through any other administrative or judicial channel, should the data subject consider that the processing of personal data carried out by the data controller is in breach of the GDPR and/or applicable legislation, they may lodge a complaint with the competent Data Protection Authority.

9. These rights may be exercised by contacting the Data Controller

Any requests pursuant to Article 15 of the GDPR must be addressed to the Data Controller at its registered office or by email to the contact email address set out in point 1 above.

The Data Controller

TTS Cleaning S.R.L