

Privacy Policy pursuant to Article 13 of Regulation (EU) 2016/679



ABOUT US

Data Controller Through its pro tempore legal representative, Aruba S.p.A., with registered office in Ponte San Pietro (BG) at Via San Clemente No. 53
privacy@staff.aruba.it

Data Protection Officer (DPO) dpo@staff.aruba.it



WHAT DATA DO WE PROCESS

CATEGORY OF DATA	EXAMPLES OF TYPES OF DATA
Personal information	First name, last name, email, phone number, organization, type, and details of the identification document where required.
Images	Moving images of the Data Subject collected through the video surveillance system.



WHY ARE THE DATA SUBJECT'S DATA NEEDED

Participation in the event and visit to the Data Center

The processing of the Data Subject's personal data takes place in order to carry out the preliminary and subsequent activities related to the request to participate in the event and visit the Data Center, as well as to fulfill any other resulting obligation. The legal basis for this processing is the performance of services related to the request to participate in the event and visit the Data Center. Providing the data is optional; however, any refusal by the Data Subject to provide the data will make it impossible for the Controller to proceed with the requested service.

Protection of company assets and organizational and production needs

The processing of the Data Subject's personal data through the video surveillance system is carried out for the purpose of protecting and managing company assets, namely for the security of property and persons, the prevention of theft, damage, and vandalism, and for production needs that require the use of technical tools needing continuous, including visual, monitoring to deliver company services. The legal basis for this processing is the legitimate interest of the Controller in protecting and managing company assets. If the Data Subject objects to the processing of their data, the Controller will not be able to allow them access to company premises.

Promotional activities for Services/Products of the Aruba Group companies

With specific consent, the Data Subject's personal data is processed so that the Data Controller can send out newsletters and communications of offers, discounts and promotions of its own Services/Products and those of the Aruba Group companies through traditional methods (e.g. ordinary mail, telephone calls with operator) and/or automated methods (e.g. e-mail, SMS, instant messaging, pre-recorded phone calls).

The legal basis of this processing is the consent initially granted by the Data Subject for the processing itself, which may freely be withdrawn at any time, without prejudice to the lawfulness of any previous processing. If the Data Subject refuses to give their consent, it will not be possible to use the relevant services, without this entailing detrimental consequences for the contractual relationship with the Data Controller.

Promotional activities for Services/Products offered by Third Parties

The processing of the Data Subject's personal data is carried out for the transfer of data to third parties, with prior specific consent, for direct marketing purposes through traditional methods (e.g., regular mail, operator-assisted phone calls) and/or automated methods (e.g., email, SMS).

The legal basis of this processing is the consent initially granted by the Data Subject for the processing itself, which may freely be withdrawn at any time, without prejudice to the lawfulness of any previous processing. If the Data Subject refuses to give their consent, it will not be possible to use the relevant services, without this entailing detrimental consequences for the contractual relationship with the Data Controller.



TO WHOM DO WE COMMUNICATE THE DATA SUBJECT'S DATA

CATEGORIES OF RECIPIENT	PURPOSE
Third party providers and companies belonging to the Aruba Group	Provision of services (assistance/maintenance, secretarial, security) for the safety of property and individuals.
Legal Authorities, Supervisory and Oversight Authorities	Fulfillment of legal requirements, defence of rights, safety of property and individuals

Persons belonging to these categories operate independently as separate data controllers or as data processors appointed by the Data Controller. The Data Controller's personnel that are specially authorised for processing, including interns, temporary workers, consultants, may also have knowledge of the data, in relation to the performance of their assigned tasks. In no case shall personal data be disclosed and they shall not, therefore, be accessible by undefined parties, in any form, for example by them being made available or subject to consultation.



HOW WE PROCESS THE DATA SUBJECT'S DATA

The data shall be processed using manual, electronic and remote means and in accordance with the requirements set by the relevant legislation, which seeks to ensure the confidentiality, integrity and availability of the Data, and to avoid material or moral damages.



WHERE WE PROCESS THE DATA SUBJECT'S DATA

The Data Subject's data is stored in archives located in European Union countries. Where necessary for the pursuit of the stated purposes, the Data Subject's Data may be transferred abroad, to countries/organizations outside the European Union guaranteeing a level of personal data protection deemed adequate by the European Commission by its own decision or, otherwise, on the basis of other appropriate safeguards, such as the Standard Contractual Clauses adopted by the European Commission or the Data Subject's consent. The Data Subject is entitled to obtain a copy of any appropriate safeguards, as well as the list of countries/organizations to which the data has been transferred by writing to privacy@staff.aruba.it.



HOW LONG WE RETAIN THE DATA SUBJECT'S DATA

Personal data will be stored in a form that allows the identification of the Data Subject for 30 days from the event or until consent is revoked. Identification document details will be stored for 30 days after the end of the event. Images will be stored for 90 days. Once the periods thus established have transpired, the Data will be deleted or processed anonymously, unless further retention is necessary to comply with orders issued by Public Authorities and/or Supervisory Bodies.



WHAT ARE THE DATA SUBJECT'S RIGHTS

The Data Subject shall contact privacy@staff.aruba.it to exercise their right to obtain, in the cases provided for in the Regulation, access to the data concerning him/her, deletion of the data, correction of incorrect data, completion of incomplete data, limitation on processing the data, portability of the data and opposition to the processing.

The Data Subject also has the right to lodge a claim with the competent Italian supervisory authority (Italian Personal Data Protection Authority) or with the agency performing its duties and exercises its rights in the member State where the breach occurred, as provided for in Art. 77 of the Regulation, as well as to file appropriate legal proceedings pursuant to Arts. 78 and 79 of the Regulation.