

Privacy Policy

INFORMATION NOTICE ON THE PROCESSING OF PERSONAL DATA

1. Introduction

In accordance with the applicable privacy laws, including Regulation (EU) 2016/679 ("GDPR") and the Italian Personal Data Protection Code ("Privacy Code" or "Code"), this Privacy Policy explains how we collect your personal data while you use the website www.dpssrl.com (hereinafter, the "Site"), how we use such data, with whom we share it and the choices available to you in this respect.

2. Data Controller of personal data

The Data Controller of your personal data is DPS Soluzioni Informatiche S.R.L., with registered office in Rome, Viale Giorgio Ribotta n. 11, tax code, VAT number and registration number in the Companies Register of Rome 07043801005, email address: info@dpssrl.com. (hereinafter, "DPS").

For DPS, your privacy and the security of your personal data are very important, which is why we collect and manage your personal data with the greatest care and adopt specific measures to keep it safe.

Below you will find the main information on the processing of your personal data in relation to your browsing of the Site and your use of the services offered.

For any clarification, question or need relating to your privacy and to the processing of your personal data you may contact us by writing to the address mentioned above or, if you wish, you may also contact our Data Protection Officer (DPO), by writing to info@dpssrl.com.

3. What is meant by personal data

Personal data, as defined by the GDPR ("Data"), concerns «any information relating to an identified or identifiable natural person». An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to his or her physical, physiological, genetic, mental, economic, cultural or social identity".

The regulation on the protection of personal data applies to the processing «of personal data wholly or partly by automated means and to the processing other than by automated means of personal data which form part of a filing system or are intended to form part of a filing system».

4. The data collected

The Data processed by DPS is all the Data you have provided to us in order to request a product or the supply of a service. By way of example, the Data may be: your first name and surname, your contact details (including address, telephone number and email address), occupation, date and place of birth, tax code. The provision of such information, where required by the contract with DPS ("Contract") or essential for its performance, is a necessary requirement for entering into the Contract; failure to provide such data may

make it impossible to enter into the Contract and/or for DPS to supply the related services and products. Browsing Data acquired by the IT systems and software procedures responsible for the operation of the Site in the course of ordinary operation is also processed, such as, for example, the IP addresses or the domain names of the computers used by the users who connect to the Site, which may be used for the sole purpose of obtaining anonymous statistical information and of checking the correct operation of the site and any misuse or anomalies.

DPS does not acquire and does not process categories of sensitive Data, such as, for example, information revealing your racial origin, your political opinions, your religious or philosophical beliefs.

5. Purposes of the processing

Your personal Data is processed by DPS mainly for the following purposes:

- to enter into and perform the Contract;
- to manage the services offered by DPS;
- to supply and improve the services and to resolve any problems connected with them (your personal Data is used to provide functionality, analyze performance, correct any errors);
- suggestions and personalisation (your personal Data may be used to identify your preferences and therefore to suggest products or services);
- interest-based advertising (your personal Data may be used to provide information that we believe to be of interest to you, and to personalize the services offered);
- statistical analysis and marketing purposes.
- communications with customer service.

As stated, the personal Data processed by DPS is the Data provided when requesting a product or the supply of a service and the Data collected while you browse or use the functions of the Site.

Data provided directly: any data provided by the user, e.g. name, home address, email address, telephone number, identity document details, credit/debit card or other payment details. Collection takes place in the event of:

- Account creation. By creating an account on the Site you may obtain advice on DPS products and services. To make this possible, we will collect your identification data (name, email address, date of birth and telephone contact). We use this personal information to create and manage your account with us and to communicate with you. The legal basis in this respect is the giving of consent to the processing for specific purposes (Article 6(1)(a) of the GDPR). After the creation of your account, we will retain your username and password.
- Contact. When you send a question or request or ask for any other type of support, you will have to provide your identification data (first name and surname, email address) and any other information you choose to indicate in the correspondence. We use this personal information to answer your questions or requests, to resolve technical problems where necessary, and to deal with any problem with the Site or with the services offered on it. The legal basis is the performance of our contractual relationship (Article 6(1)(b) of the GDPR).
- Consent to profiling activities. Only in the event of express consent, DPS may use your Data to analyze your behavior, habits and propensity to consume in order to improve the products and services offered, to meet your expectations, and to send marketing communications deemed to be of interest to you (provided that you have chosen to receive direct and indirect marketing communications). To this end, DPS will analyze your preferences and interests using automated analysis techniques which will provide us with information concerning you, including profiling. The legal basis in this respect is the giving of consent to the processing for specific purposes (Article 6(1)(a) of the GDPR).

- Consent to receive direct and indirect marketing communications. Only in the event of express consent, DPS may use your Data to send marketing communications and advertising regarding products, services, events and promotions of DPS and of its commercial partners, and to carry out market research. Such Data may be processed by automated or electronic means, including email, websites and mobile applications. To this end DPS will analyze your preferences and interests with the aid of automated analysis techniques which will provide us with information concerning you, including profiling. The legal basis in this respect is the giving of consent to the processing for specific purposes (Article 6(1)(a) of the GDPR). By giving your consent to marketing activities, DPS may share your Data with social network platforms, including Facebook, LinkedIn, YouTube and other similar platforms (hereinafter, the “Social Networks”) in order to make our activity more responsive to your interests. To do this, your Data will be hashed and encrypted before the Social Networks access it, for the purpose of sending targeted promotional advertisements to Social Network users who are already DPS customers or potential customers. Where, on the other hand, targeted promotional advertisements are sent to users on the Social Networks who appear to have shared interests or demographic data similar to those of existing or potential DPS customers, only the information provided by the Social Network according to their privacy policy is collected when users click on the advertisements displayed on the Social Networks; DPS does not have access to the identity of these latter users, unless they choose to click on such advertisements. The legal basis in this respect is the giving of consent to the processing for specific purposes (Article 6(1)(a) GDPR). You may withdraw your consent at any time in accordance with the procedures set out below. We invite you, in any case, to check the privacy policy of your Social Networks and, in particular, the consents you have given them.

Data collected automatically: certain categories of Data relating to the use of the services of the Site, to the device used for browsing and to your location are automatically collected and stored:

- Usage information. This includes information concerning your interactions with the Site, for example the pages visited, the frequency of access, how much time you spend on each page, what you click on or linger over while you are on the Site.
- Device information. This includes certain information regarding the device you use to access the Site, for example browser type, browser language, hardware model, operating system and your preferences.
- Location information. This includes information about your location, which may be determined through your IP address. In such a case your explicit consent will be requested and certain functions and/or certain promotions and/or operations may be limited or excluded in the absence of consent or for subjects of an age lower than that indicated on the Site and/or established by the legislation in force.

To collect this information we use cookies and other tracking technologies. For further information on what cookies are, what they are used for, which cookies we use on the Site (including third-party cookies such as Google Analytics, Google Ads, etc.), how long they remain on the device and how to enable or disable them, we invite you to consult our Cookie Policy.

Data received from third parties: this is information regarding personal Data received from other sources, for example account Data, information on the pages visited relating to interactions with partner companies; search results and links, including paid advertisements.

Social Networks. If you interact with DPS through Social Networks, when you fill in specific forms (e.g. requests for information, etc.) and/or when you interact with the official DPS Social Network pages/profiles, we may receive from the Social Networks your Data (e.g. email, first name, surname, country of origin, address, street number, town, postcode, telephone number) and your interactions on the Social Networks (posts you like, any private messages to DPS, etc.). Depending on the settings you have selected in your Social Network profile, DPS may be able to receive additional Data such as your age, groups you belong to, etc. which in certain cases may allow DPS to identify you. DPS may process your data to respond to your posts, requests and searches, to carry out statistical analysis and market research on the users who interact with DPS pages and/or DPS websites, as well as for marketing activities, as described above and subject to your consent.

Furthermore, should you choose to register on the DPS websites through your account on a Social Network, we will receive certain personal Data of yours from the Social Network (e.g. email, password, first name, surname, date of birth, gender, country, citizenship, address, telephone). The legal basis in this respect is the giving of consent to the processing for specific purposes (Article 6(1)(a) GDPR).

DPS accepts no liability in the event of unauthorized disclosure of your Data by third-party social media channels, in breach of the options you have selected and/or of any consents given. In this regard, we invite you to check the privacy policy of your Social Networks and, in particular, the consents you may have given them.

DPS Partners. Should you take part in initiatives and events organised by commercial partners of DPS and/or request them to supply you with a service, DPS may receive your personal data for the purpose of providing the requested service and/or the activities proposed within the initiative or event. The legal basis of this processing is the performance of our contractual relationship (Article 6(1)(b) of the GDPR).

Legal obligations. In addition to the above, DPS may process your data to comply with legal obligations and, therefore, to comply with any rule or provision of law that we intend and are required to comply with, or for Data security, for measures that are indispensable to ensure the security of your Data and of company data against external attacks and/or in order to prevent external attacks. Also to comply with legal obligations imposed on us and/or in order to prevent fraud or in the event of litigation. Lastly, for mandatory tax, accounting and administrative purposes, always in compliance with and in accordance with the legislation in force. The legal basis in this respect is compliance with a legal obligation (Article 6(1)(c) of the GDPR).

Safeguarding of rights, legitimate interests or public interest. Finally, DPS may process your data to safeguard the rights of DPS and the legitimate interests of DPS itself, except where your interests override them, or where it is necessary for the performance of a task carried out in the public interest or in the exercise of official authority, as provided for by Article 6(1)(e) and (f) of the GDPR.

6. How we share your personal data

General sharing

DPS may need to make the personal information identified in this policy available within the company, to share it with service providers and other third parties. For example:

- Within DPS. DPS may share your Data with DPS affiliates for legitimate business purposes and for the management of the business in general. The legal basis in this respect is the legitimate interest of DPS in carrying out its business efficiently.
- With service providers. DPS may share your Data with the service providers we use, including the supply and management of administrative procedures and IT systems, communication networks and protection and security systems, customer support activities (including call centers and help desks), after-sales support activities and technical interventions under warranty, for the management and maintenance of the Site. The legal basis is our legitimate interest in the Site and the DPS services being efficient. The service providers referred to above include telecommunications providers, web hosting providers, IT support, shipping service providers, payment processors, marketing and e-commerce service providers, as well as the Social Networks within the limits set out above.
- With third parties. We may need to disclose your Data to third parties, such as legal advisers, law enforcement authorities or governmental/regulatory bodies, in order to protect our legal interests and other rights, to protect ourselves against fraud or other illegal activities, to avoid harmful consequences, for risk management purposes and for the fulfillment of our legal obligations. The legal basis in this respect is compliance with the law, the fulfillment of legal obligations and our legitimate interest in protecting the rights of DPS.

- In the event of corporate reorganization. Should we carry out, or intend to undertake, a transaction involving a change in the structure of our business (for example a merger, acquisition, disposal, joint venture, concession, consolidation, transfer, change of control or divestment of all or part of our business, activities or capital), DPS would share personal information with third parties, for example the purchaser or the target company (and their respective employees, collaborators and advisers) in order to facilitate and complete the transaction. DPS would also share personal information with third parties in the event of proceedings for the management of a corporate crisis, bankruptcy or liquidation. The legal basis in this respect is our legitimate interest in carrying out corporate transactions.
- Subject to your consent. Regardless of the reasons mentioned above, we may request your consent to the processing of your Data for specific purposes, without prejudice to the right to withdraw consent at any time.

DPS will appoint all the aforementioned subjects, where necessary, as Data Processors, or they will act as independent controllers in compliance with the legislation in force, where the relevant conditions are met.

7. Choices regarding your data and possible consequences

You may access your account to correct or view certain personal information that you have provided to us and that is associated with your account.

To disable, block or delete cookies, follow the instructions provided in the Cookie Policy.

You may refuse to receive marketing emails from DPS by clicking on the “Unsubscribe” link included in every email. Please note that we will continue to send you the notifications necessary for the Site, your account, or the products or services requested.

The provision of your personal Data is optional. However, failure to provide your Data marked as mandatory will not allow our services to be offered. Should you not provide the remaining optional personal data, our services may still be offered.

The provision of Data for marketing and profiling purposes is always optional.

8. Newsletter

By subscribing to the newsletter service you agree to receive information on the products and services of DPS, associated companies and commercial partners, with the aim of improving your knowledge of the related products and services and of accessing reserved purchase opportunities.

Your email address will be used to carry out the newsletter sending service, which may also provide information on promotions of products and services supplied by DPS partners, to whom, however, your data will not be disclosed or transferred.

The user may withdraw their consent at any time and free of charge. For this purpose a notice (email, fax or letter) is sufficient and, in any case, an “Unsubscribe” link is included in every email.

9. Data security

DPS has security procedures in place for the storage and disclosure of your personal data, as well as for protection against accidental loss, destruction or damage. DPS has adopted technical and organizational measures suitable to ensure a level of security appropriate to the risk as provided for by Article 32 of the GDPR, so as to prevent the loss of Data, unlawful or incorrect uses and unauthorized access.

DPS adopts, among other measures: encrypted connections (HTTPS) to its own websites and services, perimeter protection of its servers, encryption of data held in its databases, personal and named user accounts with permissions limited to each person's role, logging of access and changes, daily backups with periodic restore testing, and the scheduled application of security updates.

We require our third-party partners to adopt adequate technical and operational security measures to protect your Data, in line with Italian and European legislation on Data protection.

However, no measure or method of Data transmission is 100% secure and we are not able to guarantee the absolute security of the personal information we have obtained from you.

10. Your rights

If the processing of your Data is subject to the GDPR, then you will have the following rights regarding the Data processed:

- Right of access. You have the right to ask us for a copy of your personal Data. This right has certain exceptions, which means that you may not always receive all the personal Data we process.
- Right to rectification. You have the right to ask us to rectify Data that you consider inaccurate and to ask us to complete information that you consider incomplete.
- Right to erasure. You have the right to ask us to erase your personal Data in certain circumstances.
- Right to restriction of processing. You have the right to ask us to restrict the processing of your Data in certain circumstances.
- Right to object to processing. You have the right to object at any time, on grounds relating to your particular situation, to the processing of your Data which is carried out on the basis of our legitimate interests.
- Right to data portability. You have the right to ask us to transfer the Data you have provided to us from one organization to another or to receive such data from us in a structured, commonly used and machine-readable format.
- Right to lodge a complaint. You have the right to lodge a complaint with a supervisory authority.

To exercise these rights, contact DPS through the contact form or in writing to DPS Soluzioni Informatiche S.R.L., with offices at Viale Giorgio Ribotta n. 11 – 00144 Rome (RM).

In any case, you will be able to find full details on the legislation in force and the complete text of the GDPR on the website of our Italian Data Protection Authority (Garante per la protezione dei dati personali) at the internet address www.garanteprivacy.it

11. Transfer of personal data outside the European Economic Area

Within the scope of our contractual relationships, we may transfer Data to countries outside the European Economic Area ("EEA"). In the event of a transfer of personal data outside the EEA, we will use contractual measures suitable to guarantee adequate protection of the Data, including the implementation of agreements based on the standard contractual clauses adopted by the European Commission.

12. Retention

We will retain your personal information for a limited period of time depending on the purpose for which it was obtained. After that period, your personal information will be erased or otherwise irreversibly

anonymised. The retention period varies according to the purpose of the processing; for example, personal information collected for contractual or pre-contractual purposes is processed until the completion of all administrative and accounting formalities. It is therefore kept on file in compliance with local tax legislation, while the personal information used to send our newsletter is retained until you request that the sending of the newsletter cease. DPS retains personal information for ten years from the moment it was provided for marketing and profiling purposes, provided that consent has not been withdrawn. In the event of withdrawal of consent, your personal information may not be processed for the aforementioned purposes, but may still be retained in order to manage any objections and/or disputes. Hashed data is deleted once the Social Networks have completed the matching process.

13. Means of processing

The processing of your Data is carried out by means of electronic or manual tools, with logic strictly related to the purposes of the processing indicated above and, in any case, in order to guarantee the protection, confidentiality and security of the data.

14. Minors

The website and the services offered on it are not directed at subjects under eighteen (18) years of age.

15. Links to third-party websites

Third-party websites accessible from this website fall under the responsibility of those third parties.

We disclaim any liability in relation to requests for and/or the provision of personal Data to third-party websites.

16. Changes to this privacy policy

DPS reserves the right to amend this Privacy Policy at any time. Any amendments will be published on this page and will specify the date of their entry into force. We therefore invite you to check the Privacy Policy frequently to see whether it has been updated.

This Policy was last updated on 1 October 2026.