Proxinova Privacy Policy

Our company is part of Neulabs Srl. This privacy policy will explain how our organisation uses the personal data we collect from you when you use our website

Our contact details

Name: Proxinova

Address: Via Borromei 6, 20123 Milano, Italy

E-mail: proxinova@neulabs.com

Data controller

The owner of the processing of personal data is NEULABS S.R.L. with headquarters at Via Borromei 6, 20123, Milan, Italy - e-mail: proxinova@neulabs.com

Data Protection Officer (DPO)

Data Protection Officer (DPO) is Avv. Francesco Angelo Lorusso, office in Viale Monte Nero, no. 66, Milan, 20135. E-mail address: lorusso@legalelorusso.it

The type of personal information we collect

We currently collect and process the following information:

a. Browsing data:

The computer systems and software procedures used to operate this site acquire, during their normal operation, some personal data whose transmission is implicit in the use of protocols of Internet communication.

This category of data includes:

- IP addresses or domain names of computers and terminals used by users, addresses in the URI/URL (Uniform Resource Identifier / Locator) notation of the requested resources
- Time of the request
- The method used in submitting the request to the server
- The size of the file obtained in response
- The numeric code indicating the status of the response given by the server
- Other parameters related to the user's operating system and computing environment

b. Data provided voluntarily by the user:

Most of the personal information we process is provided to us directly by you with your explicit willingness, for instance:

- First name and last name
- Company name
- City and country of residence
- Email address
- Shipping address
- Phone number

c. Cookies and other tracking systems:

• The data that may be acquired through cookies, and how they are managed, are described in full complete in the document "cookie policy", which we recommend to view.

How we use the information

We use the information provided for the following purposes, in accordance with Regulation (EU) 2016/679 (General Data Protection Regulation) in the current version of the OJ L 119, 04.05.2016; cor. OJ L 127, 23.5.2018 and the UK General Data Protection Regulation (UK GDPR), tailored by the Data Protection Act 2018.

a. Data related to internet browsing

- Obtain statistical information on the use of the services (most visited pages, number of visitors per time slot or daily, geographical areas of origin, etc.).
- For ascertaining liability in case of hypothetical computer crimes against the website
- To improve the navigation and content of the website

b. Data provided voluntarily by the user:

- Order taking and shipping
- Extension of warranty
- Promotional activity/newsletters from the Owner, regarding its own products and services or of third parties and business partners
- Profiling and segmentation of users based on purchasing choices and habits for marketing purposes
- Administrative accounting fulfillments, such as invoicing; payment management; Communication of the same Data between group companies, for organizational purposes, administrative, financial, and internal accounting functional to the aforementioned activities.
- Customer service management, consisting of the feedback of any question or complaint to our customer service department
- Exercise and/or defense of rights in court such as: management of any court litigation, either directly or through third parties (lawyers/agencies/debt collection companies)

Mode of data processing

The processing of personal data may be carried out with the aid of both analog and electronic means, with methods and procedures strictly necessary for the pursuit of the purposes described above.

Period of data retention

Data are processed and kept for the time required by the purposes for which they were collected, therefore:

- Personal Data collected for purposes related to the performance of a contract between the Data Controller and the User will be processed for the duration of the contractual relationship and, after its termination, until the period of prescription of the rights mutually arising between the parties. In the case of judicial litigation, for the entire duration of the same, and until the decisive decision becomes final;
- Personal Data collected for purposes attributable to the legitimate interest of the Data Controller will be retained until such interest is satisfied. The User may obtain further

information regarding the legitimate interest pursued by the Controller in the relevant sections of this document or by contacting the Controller;

• When the processing is based on the User's consent, the Controller will retain the Personal Data until said consent is revoked. In addition, the Controller may be obliged to retain Personal Data for a longer period in compliance with a legal obligation or by order of an authority.

Scope of communication, subjects authorized to process

The Data may be processed by employees of the corporate functions assigned to the pursuit of the purposes indicated above, in their capacity as authorized processors pursuant to GDPR art. 2-quaterdecies of the Legislative Decree 196/2003.

The Data are not subject to dissemination, but may be processed, on behalf of the owner, by external parties designated as data processors ex art. 28 GDPR, who carry out on behalf of the owner specific activities, by way of example, third parties whose knowledge of the data is necessary for the performance of their task of couriers and logistics partners, wholesalers, dropshippers, legal, tax or administrative.

The data could also be communicated to public or private entities entitled to process them as autonomous data controllers (e.g. public administrations, banks and credit institutions, accountants, notaries, lawyers and other professionals).

No processing involves the transfer of personal data outside the territory of the European Union and the United Kingdom.

Provision of data:

The provision of personal data under 4(b) is optional. However, any refusal to provide personal data will result in the inability of the Data Controller to pursue the various purposes mentioned above

Rights of the data subject:

We would like to make sure you are fully aware of all of your data protection rights. Every user is entitled to the following:

The right to access – You have the right to request us for copies of your personal data.

The right to certification – You have the right to request that we correct any information you believe is inaccurate. You also have the right to request us to complete information you believe is incomplete.

The right to erasure – You have the right to request that we erase your personal data, under certain conditions.

The right to restrict processing – you have the right to request that we restrict the processing of your personal data, under certain conditions.

The right to object processing – you have the right to object to us processing your personal data, under certain conditions.

The right to data portability – you have the right to request that we transfer the data that we have collected to another organization, or directly to you, under certain conditions.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us at our email: <u>proxinova@neulabs.com</u>

Changes to our privacy policy

Our company keeps its privacy policy under regular review and places any updates on this web page. This privacy policy was last updated on September 7^{th,} 2022