

## ***INFORMATION ON THE PROCESSING OF PERSONAL DATA***

This information notice, provided in compliance with the provisions of Articles 13 and 14 of EU Regulation 2016/679 (hereinafter, **GDPR**) and of Legislative Decree No. 196/2003 and subsequent amendments and additions, describes the operations carried out on the personal data of users collected when using the services provided on the following website [www.almacube.com](http://www.almacube.com) (hereinafter, the **Site**) and not also for other websites that may be consulted by the user via links on the Site.

### ***TITLE, PURPOSE and LEGAL BASIS OF TREATMENT***

**ALMACUBE S.r.l.** (hereafter, **ALMACUBE**), in the person of its Legal Representative *pro tempore*, via G. Fanin, 48 - 40127 Bologna, P. IVA 03277261206, , e-mail [privacy@almacube.com](mailto:privacy@almacube.com), is the **Data Controller of the** personal data of users collected using the services of this website. **ALMACUBE** will process the personal data it comes into contact with in accordance with the principles of lawfulness, correctness and transparency as well as the provisions of the law and regulations for the following purposes:

- Internet access and navigation;
- Newsletter subscription;
- Handling of enquiries;
- Work with Us
- Application of Start-ups, Spin-offs and Innovative SMEs

In detail, the use of personal data for accessing the site and browsing activities involves the processing of data to implement measures taken at the request of the person concerned, which is the legal basis that legitimises the processing. The use of personal data for the management of further processing, with an indication of the specific legal basis of the processing, is described in

the section of this policy dedicated to the principles applicable to data processing by ALMACUBE.

### ***PLACE OF PROCESSING OF DATA***

Processing related to the web services of this Site takes place at the aforementioned registered office of the Data Controller and at the hosting company providing the service, with servers located in the EU. .

### ***DATA CATEGORIES PERSONAL***

#### ***Navigation data***

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

This information is not collected in order to be associated with identified data subjects but by its very nature could, through processing and association with data held by third parties, allow users to be identified.

This category of data includes the IP addresses or domain names of the computers used users connecting to the site, the *URI (Uniform Resource Identifier)* notation addresses of the resources requested, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the *server* (successful, error, etc.) and other parameters relating to the user's operating system and computer environment.

This data is used for the sole purpose of obtaining anonymous statistical information on the use of the site and to check its correct operation and is deleted immediately after processing. The data could be used to ascertain responsibility in the event of computer crimes to the detriment of the site or the Data Controller: apart from this eventuality, at present, the data on *web* contacts do not persist beyond the terms of the law.

### ***Data provided voluntarily by the user***

The optional, specific and voluntary sending of electronic mail to the addresses indicated in this site entails the subsequent acquisition of the sender's address by ALMACUBE, necessary in order to reply to requests, as well as any other personal data included in the communication. Specific summary information will be given or displayed on the pages of the site set up for particular services on request.

### ***Personal Data***

By means of the functionalities present within the ALMACUBE website, the user can grant some of his or her personal information that may make him or her identifiable and which may be processed in order to manage, for example, his or her requests.

The information that may be requested includes, but is not limited to, personal data such as:

- Name and Surname
- Telephone number and e-mail address

### **COOKIES**

For the cookie policy of Site you please refer to the appropriate site

<https://www.iubenda.com/privacy-policy/61955328/cookie-policy>

### **PRINCIPLES APPLICABLE TO DATA PROCESSING BY ALMACUBE**

ALMACUBE shall process users' personal data in a lawful, correct and transparent manner. The Controller shall collect personal data from users and process them solely for the purposes indicated in this Privacy Policy and in a manner that is not incompatible with those purposes. The data processed by ALMACUBE are adequate, relevant and limited to what is necessary for the purposes for which they are processed, including:

## 1. NEWSLETTER

Subject to the consent of the person concerned, ALMACUBE will process the user's personal data (name, surname and e-mail address) in order to allow the user to subscribe to the informative and/or promotional newsletter and this data will be recorded, stored and used exclusively for sending digital communications to promote the activities, initiatives and projects promoted by ALMACUBE.

The legal basis for this processing is the consent of the data subject (Art. 6(1)(a) GDPR). The provision of consent for this purpose is optional and the data will be processed until consent is revoked by the person concerned, which may be exercised at any time (by clicking on *unsubscribe* or by written request to [privacy@almacube.it](mailto:privacy@almacube.it)).

## 2. REQUESTS FOR INFORMATION

The Data Controller will process the personal data of users who fill in the special online forms for requesting information on initiatives, projects, products or services offered by ALMACUBE in order to manage, respond to and provide what has been requested by the data subject. The data will be recorded, stored and used to respond to the requests of the interested parties and for the time necessary to achieve the aforementioned purpose. The legal basis for this processing is the execution pre-contractual measures taken at the request of the data subject (Art. 6(1)(b) GDPR).

The provision of data for this purpose is optional. However, failure to provide data, or providing partial or incorrect data, may make it impossible for ALMACUBE to manage and follow up user requests.

## 3. WORK WITH US

ALMACUBE will use the personal data of users who fill in the appropriate online form or contained in CVs sent spontaneously by the person concerned, even following a recruiting campaign promoted by the Data Controller, to manage the selection of new personnel and for candidate

assessment. The data shall be processed for the period of time strictly necessary for the pursuit of the purpose in question and retained for a limited period from the time of receipt of the CV, without prejudice to the possibility of the Data Controller to extend the retention period after expressly requesting the data subject to do so. The legal basis that legitimises this processing is the execution of pre-contractual measures adopted at the request of the data subject, pursuant to Article 111-bis of Legislative Decree no. 196/2003, as updated by Legislative Decree no. 101/2018, for which, within the limits Article 6 letter b) EU Regulation 2016/679, the data subject's consent is not required.

The provision of data for this purpose is optional. However, failure to provide data, or providing partial or inaccurate data, may make it impossible for the Controller to receive the application and assess whether it corresponds to the job profile sought and to proceed with the selection process.

#### **4. CANDIDATING START-UPS, SPIN-OFFS and SMEs INNOVATIVE**

ALMACUBE will collect the personal data of users who fill in the online form for sending the application of their Start Up, Spin Off or Innovative SME in order to assess their requirements to join the acceleration and incubation programmes promoted by the Owner. The data will be processed for the period strictly necessary for the pursuit of the purpose in question and stored for a limited period from the time the application is received. legal basis legitimising this processing is the execution of pre-contractual measures taken at the request of the data subject (Art. 6(1)(b) GDPR).

In order to apply, you may optionally be asked to record a video presentation. Images will be processed for the sole purpose of evaluating the application.

This website uses so-called '*social plug-ins*'. *Social plug-ins* are specific tools that allow *social network* functionalities to be incorporated directly into the website. All '*social plug-ins*' on the site are marked with the respective logo owned by the social networking platform.

When you visit a page on our site and interact with the '*plug-in*' or decide to leave a comment via the social platform, the corresponding information is transmitted from your *browser* directly to the relevant social platform and stored there.

For information on the purposes, type and methods of collection, processing, use and storage of personal data by the *Social Network* platform, as well as on how to exercise your rights, please consult the *Social Network's* specific *Privacy Policy*.

## **GOOGLE MAPS**

This is a service provided by Google LLC ('Google') for including interactive maps within web pages. This service, depending on the settings the data subject's account may process the data subject's personal data, including the geographical location of the user.

To consult the privacy policy of the company Google LLC and to deactivate the localisation function of your browser, please refer to the following link:

<https://policies.google.com/technologies/location-data?hl=it>.

## **MODALITIES OF TREATMENT**

Personal data are and will be processed, in paper and/or digital form, for as long as is strictly necessary to achieve the aims and purposes for which they were collected. There is no automated processing of the collected data, including profiling of users. Specific security measures are observed to prevent loss of data, or incorrect use and unauthorised access.

## **TRANSFER OF PERSONAL DATA TO COUNTRIES OUTSIDE EUROPEAN UNION**

Personal data collected by Almacube are processed and stored within the territory of the European Union. Some personal data may be subject to transfer to recipients located outside the European Economic Area. In this case, the transfer will take place in compliance with the provisions of Chapter V of the EU Regulation 2016/679 ("GDPR"); in particular, data will only be transferred subject to the signing of the Standard Contractual Clauses approved by the EU Commission with Decision No. 2021/914/EU or to countries able to guarantee an adequate level of protection of personal data and therefore recipients of an Adequacy Decision adopted by the EU Commission.

#### **CATEGORIES OF PERSONS TO WHOM THE DATA MAY BE COMMUNICATED (RECIPIENTS)**

The parties to whom ALMACUBE may communicate data act as data processors.

Processing of personal data designated through specific agreements or as persons authorised to process personal data by the Controller. Lastly, the data may be communicated to external Companies and/or Professionals in order to fulfil specific obligations imposed on the Controller by current legislation. By requesting access to their personal data, data subjects may obtain a list of the recipients of their personal data by writing an e-mail to [privacy@almacube.com](mailto:privacy@almacube.com)

Finally, in view of the plurality of parties participating in the various incubation and acceleration programmes and projects, the data may be disclosed to other participating parties, who act, in the cases provided for, as autonomous data controllers for the processing within their sphere of competence, necessary to pursue the purposes of the project to which they refer.

#### **RIGHTS OF THE CONCERNED**

Interested users of the Site have the right, pursuant to Articles 15-22 GDPR, to:

- **Request for access to personal data:** you have the right to obtain from the Data Controller confirmation as to whether or not personal data concerning you are being processed and, if so, access to that data. Access may be aimed at obtaining the following information:
  - o The purposes of processing;
  - o The categories of personal data in question;
  - o The recipients or categories of recipients to whom the data have been or will be disclosed, in particular to third countries or international organisations;
  - o The retention period of personal data or the criteria used to determine this period;
  - o The existence of the right to request from the Data Controller the rectification or erasure of data or the restriction of or opposition to data processing;
  - o The existence of an automated decision-making process.
- **Request for rectification of personal data:** the data subject has the right to obtain the rectification of inaccurate personal data concerning him/her, as well as to obtain the integration of incomplete personal data.
- **Request for deletion of personal data:** for the reasons indicated in Article 17 GDPR, the data subject has the right to request the Data Controller to delete the data without undue delay and the Data Controller has the obligation to delete the personal data of the data subject, provided that there is no *legal* obligation to retain the data.
- **Request for restriction of data processing:** in the event of one of the cases referred to Article 18 GDPR, the data subject has the right to request the restriction of data processing concerning him or her.
- **Request for data portability:** the data subject has the right to receive, in structured, commonly



used and readable format, personal data concerning him or her that has been provided to a Data Controller and has the right to transmit such data to another Data Controller where the processing is based on consent, on a contract or is carried out by automated means.

- **Request to object to processing:** the data subject has the right to object to the processing of personal data concerning him/her at any time, on grounds relating to his/her particular situation.
- **Withdrawal of consent:** the data subject has the right, at any time and as easily as he or she has given it, to withdraw consent to the processing of his or her personal data. The data subject also has the right to lodge a complaint with the Italian Data Protection Authority ([www.garanteprivacy.it](http://www.garanteprivacy.it))

Requests for the exercise of the above-mentioned rights by the data subject may be addressed to [privacy@almacube.com](mailto:privacy@almacube.com)

This privacy policy is updated on 05/09/2024.