

Privacy Policy

This privacy information notice is provided in accordance with Article 13 of EU Regulation 2016/679 (“GDPR”) and with Italian Legislative Decree 196/2003, as amended by Italian Legislative Decree 101/2018, to users interacting with the website of ROBOQBO S.R.L., accessible electronically from the address: www.roboqbo.com, which lands on the site’s home page.

This privacy information notice describes only the management methods for the company’s official website and not those for other external websites that users may visit using links.

Additional information may be provided in the different access channels, divided according to the topics covered. Other information notices relating to specific services may be provided throughout the Website.

Data Controller: ROBOQBO S.R.L.

VIA MAZZINI 1 - 40010 BENTIVOGLIO (BO) - Italy

Contact information: info@roboqbo.com

Purposes of personal data processing	Legal basis for the data processing	Duration of Data Storage
General administrative-accounting activities and to fulfil legal obligations, regulations and applicable national and supranational legislation	Need to comply with legal obligations	Contract term and after termination, for the normal limitation period of 10 years.
If necessary, to ascertain, exercise or defend the Data Controller’s rights in a court of law	Legitimate interest	For its entire duration until exhaustion of all appeals.
Any request of contact, with sending of the information you requested	Performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (Article 6(1)(b) of the Regulation)	Time needed to respond
Sending of commercial communications by email or telephone, including updates or invitations relating to events, satisfaction questionnaires and informative communications ("Newsletter") from the company to those who expressly made the request by entering the requested information in the specific data collection form. The registration will enable the Data Controller to manage the information and respond to your requests, including deletion requests.	Performance of the contract to which the data subject is a party.	Until the right to object is exercised through the use of the specific “unsubscribe” button or by contacting the Data Controller at the addresses specified at the bottom of the notice
Direct Marketing. Should the interested party fill in dedicated data collection forms, in specific areas with direct Marketing purposes: with	Consent art. 6 par. 1 lett. A) the data subject gave consent to the processing of personal data.	Until opposition (opt out/ withdrawal of consent)

<p>prior consent and until own objection to direct marketing from Data Controller, market research, direct sales, satisfaction surveys, newsletter and promotional/commercial/advertising material or related to events and initiatives from Data Controller via e-mail, fax, SMS or other text messages, as well as via agent calls, also automated and paper mail together with other informative material.</p>		
<p>After the above storage periods have elapsed, the Data will be destroyed, deleted or rendered anonymous in accordance with technical deletion and backup procedures.</p>		

Type of Data Processed and How Data are Collected

Navigation data – log files

Users can access the Site without being asked to provide personal data. The computer systems and dedicated software that operate this website detect some data during normal use (transmission of which is inherent in the use of Internet communication protocols) unrelated to directly identifiable users. Data collected include IP addresses of users who connect to the site, addresses of requested resources in URI/URL (Uniform Resource Identifier/Locator) notation, time of the request, and numerical code identifying the status of the server's answer (successful, error, etc.) and other parameters related to the operating system and IT environment of the user's device.

This information does not provide personal data of users and is not collected for the purpose of associating it to identified data subjects, but rather, it is data of a technical/IT nature collected and used in aggregated and anonymous form to ensure the Site is working correctly and to monitor the security of the Site; to improve the quality of the service and provide statistics relating to the use of the Site; and to ascertain liability in the event of computer crimes to the detriment of the Site.

Data Provided Voluntarily by Users

If messages are sent voluntarily to contact addresses and if any form on the Data Controller's Site is filled out and sent, the sender's contact data and all the personal data included in the messages will be stored. The data are necessary to reply to the requests and/or deliver the service requested.

With specific reference to newsletter services: data such as name, e-mail address and any potential personal data provided upon subscription to the newsletter service are to be considered as voluntarily given by the user in order to send recurring informative communications as well as company updates.

Users can rest assured that said processing of personal data shall be in accordance with principles of fairness, lawfulness, transparency and confidentiality protection, in compliance with the provisions of the GDPR. In any case, before any service is activated, an information notice will be provided and, where necessary,

consent to the processing of personal data obtained. Users can withdraw this consent at any time, thereby also waiving the possibility to use the related service.

There are no consequences to refusing or withdrawing consent except the impossibility to use the Site and/or receive the service requested or obtain more detailed information regarding the Company's activities.

In any case and where necessary, personal data can be processed if the Data Controller has a legitimate interest or must comply with a legal obligation. More specifically, obtaining consent to the processing referred to in the preceding section on navigation data and log files is not required because the processing of the data is regarded as a legitimate interest (in accordance with Article 47 of the GDPR).

Provision of Data

With the exception of what was specified in relation to navigation data, provision of personal data by data subjects for the purposes described in the previous paragraph is optional. Failure to provide the data can result in the impossibility to use certain services throughout the website.

Cancelling the Service

If you no longer wish to receive the newsletter, you can click the "unsubscribe" button at the bottom of every newsletter or contact us any time at the address info@roboqbo.com

Data Processing Methods

Personal data are processed with automated instruments for the period of time strictly necessary to fulfil the purposes for which the data were collected in accordance with the principles of lawfulness, purpose limitation and data minimisation set out in Article 5 of the GDPR and in observance of the required times prescribed by law. Specific security measures are implemented to prevent the data from being lost, used unlawfully or inappropriately, and accessed without authorisation.

Data Disclosure and/or Dissemination

Your processed data will not be disseminated but may be disclosed to companies that are contractually bound to the company, in accordance with and within the limitations of the GDPR (by way of example: zone salespeople, agents, dealers,...). The personal data are stored on servers located within the European Union. It is to be understood that, if necessary, the Data Controller shall have the right to move the servers outside the EU GDPR. In that case, the Data Controller hereby assures that the transfer of data outside the EU shall take place in compliance with applicable legal provisions, subject to stipulating the standard contract clauses envisaged by the European Commission, and users shall be informed.

The data may be disclosed to third parties belonging to the following categories:

- Subjects to whom management of the customer/potential customer has been appointed to guarantee a better sales service;
- subjects that provide services for management of telecommunication networks and the company's information system (including email);
- firms or companies in the context of assistance and consultancy relationships;
- competent authorities for the fulfilment of legal obligations and/or requirements from public bodies, on request;
- companies offering marketing platform management services;
- companies offering website and IT maintenance services.

The subjects belonging to the aforesaid categories act as Personal Data Processors or as fully independent Data Controllers. The list of Personal Data Processors is continually updated and available at the company

headquarters. Any additional disclosure or dissemination of data will be done only after your express consent has been obtained.

Possible Existence of an Automated Decision-Making Process

The Data Controller informs the data subject that there is no automated decision-making process in existence at this site and, therefore, no profiling system.

Children

The Site and Services of the Data Controller are not intended for children under the age of 16 and the Data Controller does not intentionally collect personal information of children. In the event of involuntary acquisition of information of children, the Data Controller will see it is deleted immediately upon the user's request.

Rights of the Data Subject

Data subjects have the right to receive from the Company information on how their personal data has been processed by sending an email at: info@roboqbo.com

- **Right of access:** We are transparent regarding the data we collect and how we use that data. You may email us at any time to access the information in our possession.
- **Right to rectification:** You have the right to have any data that is inaccurate or incomplete rectified and request the update and/or modification of the data.
- **Right to erasure:** Send a request to have all of your personal data erased and we will process your request within 30 days.
- **Right to restriction:** You have the right to ask the Data Controller to restrict the processing of your data.
- **Right to portability:** If so requested, we will export your data in a structured manner and in a commonly used, machine readable format for transfer to third parties.
- **Right to object:** You may unsubscribe at any time from all the specific uses we make of your data (newsletter, automatic emails, etc.).
- **Right to lodge a complaint:** If you believe that your rights have been violated, you can lodge a complaint with the competent authority according to the instructions published on the website www.garanteprivacy.it or by email at urp@gpdp.it.