

## **General information**

This Privacy Policy is intended to describe the processing of the personal data of the users of the Aruba services. It is an informative document made for those who buy services Aruba or connect to the website [www.getdotcloud.com/www.nic.cloud](http://www.getdotcloud.com/www.nic.cloud) and the pages or third level domains connected to it. The procedure laid down by the existing legislation provides for the protection of persons and other subjects with respect to the processing of personal data. In accordance with the terms therein, this processing will be based on the principles of propriety, lawfulness and transparency protecting the confidentiality and rights of the subscriber. The processing of personal data that Aruba intends to conduct has the purpose of concluding, managing, and executing contracts for the supply of services; to organise, manage, and execute the supply of services, also through communication of the data to third party Suppliers or to companies in the Aruba group; to comply with legal obligations or other obligations required by the competent authorities; The processing will be carried out electronically/manually;

The data collected will also be used by Aruba for the integral and proper execution of the contract and will be made readily accessible to third parties to defend the rights and fulfill legal obligations or regulations required by the competent authorities, and they will be processed according to the principles of honesty, lawfulness and transparency while protecting the confidentiality and the rights of the Customer and Third Parties. The data controller is Aruba Pec S.p.A., whose registered office is in Via S. Ramelli n. 8 52100 Arezzo Italy, which, in accordance with Art. 29 of Legislative Decree 196/2003, and in compliance with Directive 95/46/EC, will respectively appoint one or more Managers external to the processing who will act under their direct authority according to the instructions received, identified within the territory of the European Union and in compliance with the safeguards provided for by the EU on the protection of personal data. The Customer may contact the data controller (Aruba Pec S.p.A.) at any time by contacting the Data Controller's Offices, to exercise their rights, as provided for in the legislation in force.

## **Browsing and login data**

The information systems and software procedures involved in operating the Aruba services acquire, in normal operation, some personal data which are transmitted implicitly when using Internet communication protocols. This concerns traffic and telecommunications data which, by their nature, are not immediately associated with identified parties, but through processing or associations with data held by third parties may permit the identification of the users/visitors to the site (e.g., IP addresses). These data are only used for anonymous statistical information relating to the use of the service or to check that it is functioning correctly. These data are retained by the Company Aruba Pec S.p.A. for the as long as is strictly necessary and in accordance with applicable laws and regulations on the matter. The Customer expressly

acknowledges the existence of the Connections Record (LOG - data about telecommunications traffic), compiled and kept by Aruba according to the terms and in accordance with the procedures laid down by law. This register constitutes complete and unquestionable proof of the facts and of acts performed by the Customer in respect of Aruba and/or a Third Party; it has an absolutely confidentiality character and will be exhibited and/or provided only on request of the parties expressly indicated by law. Aruba adopts all the technical and organisational measures necessary to ensure the confidentiality of the Connections Record. Aruba reserves the right to retain the "Access Logs" (called FTP LOG) generated by the Customer when accessing any management panel present for the service that is the subject of the contract, for a period of time equal to or greater than the duration of the contractual relationship. At the end of the retention period it is a legal requirement that these data are destroyed and the possibility of obtaining a copy of this documentation can no longer be guaranteed.

## **Cookies**

Cookies (temporary markers) that enable faster access to the websites are used on the Aruba websites. A "cookie" refers to certain information, active only for the duration of the single session-user, which will be transmitted from the website to the user's computer in order to enable quick identification. The user can always request the deactivation of cookies by changing their browser settings; this deactivation however, will slow down or prevent access to some parts of the website. The session cookies used avoid recourse to other computer techniques, which are potentially harmful to the confidentiality of user browsing and do not permit the acquisition of the user's personal identification data.

## **Data provided by users**

If the Customer intends to register in the database of Aruba Pec S.p.A., in order to access the services provided by Aruba, they will be required to fill in a form which grants their express consent to the processing of their data. The communication of the data will be indispensable but not compulsory, and the refusal will have no consequence but will result in the nonpunctual fulfilment of the obligations assumed by Aruba Pec S.p.A. for the provision of the service required.

## **Data input by the Customer**

The Customer independently performs, remotely via the internet, via a special login, password and related FTP programs and/or Frontpage, the inputting and/or updating of the material entered in the space available to them, Aruba does not and could not, check this information. Therefore, the Customer undertakes to take charge of protecting the data entered and to independently and directly comply with all the rules and regulations on the protection of personal data including acquiring the consent of third parties when necessary.

### **Third party websites and services**

On Aruba's web pages you can find hyper links to other web sites, suggested to provide its users with a better service. Aruba is in no way responsible for content on the websites which users might access via their website. The existence of a link to another site does not therefore imply approval or acceptance of liability on the part of Aruba about new site content which is accessed, even in relation to the policy adopted for the processing of personal data, as well as its use.

### **Information security**

All information collected is stored and maintained in secure facilities that limit access to authorised personnel only. The services are constantly maintained to check for the presence of any security breaches to ensure that any information collected is protected against any intrusion from third parties who want to own it without authorisation.

Aruba Pec S.p.A. takes all the security measures described in applicable local laws and regulations in force in the European Union, and shall take all appropriate measures according to the latest criteria to ensure and guarantee the confidentiality of users' personal data, and to minimise to the extent possible, the hazards from unauthorised access, removal, loss or damage to users' personal data.

### **Right to access personal data and other rights**

#### **(Art. 7 Legislative Decree 196/2003 – DIR. 95/46/EC):**

The interested party has the right to obtain confirmation of the existence or not of personal data concerning him or her, even if not yet registered, and their communication in an intelligible form.

The interested party has the right to obtain the indication:

- a) Of the origin of the personal data;
- b) Of the purposes and methods of the processing;
- c) The logic applied when the processing is performed by electronic instruments;
- d) The identification of the controller, the responsible persons and the designated representative;
- e) of the subjects or categories of subjects to whom the personal data may be communicated or who may come to be aware of it as a State appointed representative or appointed by managers or employees.

The person concerned has the right to obtain:

- a) Any update, adjustment or, when there is an interest, the integration of the data;
- b) The deletion, transformation into an anonymous form or the blocking of any data processed illegally, including those for which it is not necessary to keep, in relation to the purposes for which the data were collected or subsequently processed;
- c) Proof that the operations referred to in subparagraphs

(a) and (b) have been brought to the attention, also as regards their content, of those to whom the data were communicated or disseminated, except in the case where this proves impossible or involves a manifestly disproportionate effort compared with the right that is to be protected.

The interested party has the right to object, in whole or in part:

- a) for legitimate reasons, to the processing of personal data concerning him/her, even though they are relevant to the purpose of the collection;
- b) to the processing of personal data concerning him/her for the purpose of sending advertising or direct sales material for market research or commercial communications.

### **Contacts**

All requests should be addressed to Aruba Pec S.p.A. whose registered office is in Arezzo (Italy) Via Ramelli n. 8, 52100 Tel. 0575/0500 Fax 0575/862020.