

Dear Supplier,

This privacy notice ("Privacy Policy") aims to provide you with a clear, complete, and simple understanding of how your personal data ("Data") is processed.

1. WHO IS THE DATA CONTROLLER?

The Data Controller is **APPRENDO S.r.l.**, located at Via delle Erbe no. 9, 33100 Udine, Italy (VAT no. 03029040304). For information about data processing, you can contact us at the following email address: help@viblio.com.

2. WHAT PERSONAL DATA DO WE COLLECT AND PROCESS?

The following personal data may be processed:

- **Identification** and contact data;
- **Tax, administrative, accounting, and commercial** data;
- Other administrative or commercial data.

3. FOR WHAT PURPOSES DO WE PROCESS PERSONAL DATA, AND WHAT IS THE LEGAL BASIS?

- Contractual relationships:** The requested data is necessary to conclude and execute the contract in which you are a party. **Legal Basis:** The processing is lawful as it is necessary for the execution of a contract in which you are a party.
- Legal obligations:** Certain data, such as billing data, is necessary to comply with legal obligations, including accounting and administrative management, and for communication with public administrations or other public entities. **Legal Basis:** The processing is necessary for compliance with legal obligations to which the Data Controller is subject and/or contractual obligations involving you.
- Management control:** Some data may be used for internal management control purposes. **Legal Basis:** The legitimate interest of the Data Controller.
- Disputes:** Some data may be processed to initiate out-of-court or judicial proceedings to protect the Data Controller's rights and interests. **Legal Basis:** The legitimate interest of the Data Controller to exercise or defend a right.

4. NATURE OF DATA PROVISION

Providing the requested data for the purposes outlined in sections **3a** and **3b** is mandatory. Failure to provide the requested information would prevent the execution of the contract and/or compliance with applicable laws.

5. HOW LONG DO WE RETAIN DATA?

Data will be retained for a limited period depending on the type of activity involving your personal data. After this period, your data will be permanently deleted or irreversibly anonymized. Your personal data will be stored in compliance with the following timeframes and criteria: Data will be retained for the time necessary to achieve the purposes outlined above and in any case no longer than the periods required by specific legal obligations.

6. WHO MAY YOUR PERSONAL DATA BE DISCLOSED TO?

Your personal data will be processed by authorized personnel who have been appropriately trained and operate under the authority and responsibility of the Data Controller.

Some of your data may be disclosed, solely for the purposes specified above, to the following entities:

- Financial institutions, banks, and credit agencies;
- Legal or consulting firms to which the Company has assigned specific mandates;
- Companies providing IT system maintenance and support or data storage solutions;
- Other entities or companies performing activities instrumental to the purposes outlined above on behalf of the Data Controller.

A detailed list of all recipients is available at the Data Controller's registered office.

7. RIGHTS PROVIDED BY LAW

The European data protection law ("GDPR") grants a series of rights that can be exercised to maintain control over your data. To exercise your rights, please write to help@viblio.com.

We are required to respond within 30 days of receiving your request and will strive to address it as quickly as possible.

- Right of access:** The right to obtain information about the processing of personal data, access the data, and receive a copy, including via commonly used electronic means. We commit to providing a summary of the data in our possession, such as identification data, contact information, or inquiries received via contact forms or email.
- Right to rectification:** The right to request the updating, integration, or correction of data. If you believe the data is incorrect or outdated, we will work to resolve the issue.
- Right to data portability:** You may request the transfer of data processed under the contract or based on your consent, even directly to another data controller.

- d. **Right to erasure:** The right to request the deletion of stored data. In certain cases, you can request direct deletion, and we will act promptly. However, not all data can be deleted upon request, as some may be required to comply with legal obligations or remain in use.
- e. **Right to restriction and objection:** The right to request the restriction of processing or to object, in whole or in part, to the processing of personal data. In case of a request for restriction, we are required to suspend all operations involving your data for a determined period.

If you believe one or more processing activities carried out by us may violate regulations or that your rights have not been adequately protected, you can file a complaint with the supervisory authority in your place of residence or where the alleged violation occurred. In Italy, you can contact the Data Protection Authority ("Garante Privacy").