

Dear Customer,

This privacy notice regarding the processing of personal data ("Privacy Policy") will allow you to clearly and comprehensively understand how your personal data (Data) is processed.

## 1. WHO IS THE DATA CONTROLLER?

The data controller is **APPRENDO S.r.l.**, with its legal headquarters at 33100 Udine, via delle Erbe n. 9 (P.I. 03029040304). For information about data processing, you can write to the following e-mail address **help@viblio.com**.

## 2. WHAT PERSONAL DATA DO WE COLLECT AND PROCESS?

The following personal data may be processed:

- **Personal identification** data (first and last name) and **contact** details (phone number and e-mail);
- **Fiscal, administrative, accounting, and commercial** data;
- Information related to the services purchased.

## 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 lawful condition for processing is the execution of the contract in which you are a party.
- Legal Obligations.** Certain data, such as billing information, is required to comply with legal obligations, including accounting and administrative management, and to fulfill communication duties to Public Administrations or other Public Entities. **Legal basis:** The necessity to comply with legal obligations to which the data controller is subject and/or contractual obligations in which you are a party.
- Management Control.** Some data may be used for internal analysis and business performance improvement. **Legal basis:** The legitimate interest of the data controller.
- Disputes.** Certain data may be processed to initiate extrajudicial or judicial procedures to protect the rights and interests of the Controller. **Legal basis:** The legitimate interest of the Controller in exercising or defending a right.

#### 4. NATURE OF DATA PROVISION AND PROCESSING METHODS

The provision of the requested information for the purposes outlined in point **3**, letters **a)** and **b)**, is mandatory. Failure to provide the requested information would prevent the execution of the contract and/or compliance with the applicable regulations.

#### 5. HOW LONG DO WE STORE DATA?

Your data will be retained for a limited period, which varies depending on the type of activity involving the processing of your personal data. Once this period has expired, your data will be permanently deleted or irreversibly anonymized. Your personal data will be stored in compliance with the following terms and criteria:

- Contractual and billing data will be retained for the period necessary to achieve the aforementioned purposes and, in any case, no longer than the deadlines established by specific legal obligations.

#### 6. TO WHOM MAY YOUR PERSONAL DATA BE DISCLOSED?

Your personal data will be processed by authorized personnel, properly trained and operating under the authority and responsibility of the Data Controller.

Some information may be disclosed, exclusively for the purposes specified above, to the following entities:

- Credit institutions, financial companies, and banks;
- Law firms or consultancy firms to which the Company has assigned a specific mandate;
- Companies providing IT support and maintenance or suppliers of digital storage systems;
- Other entities or companies carrying out activities instrumental to the aforementioned purposes on behalf of the Data Controller.

A detailed list of all recipients is available upon request from the Data Controller.

#### 7. RIGHTS PROVIDED BY LAW

The European data protection law ("GDPR") provides a series of rights that can be exercised to maintain control over your data. To exercise your rights, you can write to [help@viblio.com](mailto:help@viblio.com).

We are required to respond within 30 days of receiving your request, and we will do our best to reply as quickly as possible.

**Right of Access:** The right to obtain information regarding the processing of personal data, to access it, and to receive a copy, including through commonly used electronic means. We are committed to

providing a summary of the data we hold, such as personal details, contact information, or requests received via contact forms or email.

**Right to Rectification:** The right to request the updating, supplementation, or correction of data. If you believe that your data is incorrect or outdated, we will do our best to resolve the issue.

**Right to Data Portability:** You can request the transfer of data processed for the execution of a contract or based on your consent, including direct transfer to other data controllers.

**Right to Erasure:** The right to request the deletion of stored data. In some cases, you may request immediate deletion, and we will proceed as quickly as possible. However, not all data can be deleted upon request, as some may be necessary to fulfill legal obligations or still in use.

**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. If a request for restriction is made, we are required to suspend all data processing operations for a specified period.

If you believe that one or more of our data processing activities may be in violation of regulations, or if you feel that your rights have not been properly protected, you can file a complaint with the Supervisory Authority in the country where you reside or where the alleged violation occurred. In Italy, you can contact the Garante per la Protezione dei Dati Personali.