

PRIVACY POLICY

Last Update: February 2024

This page describes website management procedures with reference to the processing of its users' personal data.

In compliance with articles 13 and 14 of General Data Protection Regulation (EU) 679/2016, the information given herein shall be addressed to any person interacting with the web services of *Zcube S.r.l.* and are available at: www.openaccelerator.it. This website guides the user to the home page of the official website of *Zcube S.r.l.*

The information provided shall regard only the Company's website and is not intended for any other website viewed by the user via links.

The information also complies with the Recommendation No. 2/2001, which the European personal data protection authorities, convened in the group established under article 29 of the Directive 95/46/EC, adopted on 17 May 2001. This Recommendation establishes minimum requirements for any on-line collection of personal data and, in particular, for times, forms and nature of the information processing owners must provide to users when connecting to websites, regardless of the purpose of connection.

PROCESSING "OWNER"

The website is accessible by users with no obligation to enter their personal data; however, after viewing the website, any data related to identified or identifiable persons may be processed. The "Data Controller" of personal data processing is *Zcube S.r.l.*, whose registered office is located at Via Lillo del Duca n° 10, 20091 in Bresso (Milan), Italy. The data collected through the website may be processed by third parties, appointed as Data Processors by the Data Controller, and will be kept only for the period of activity of the site.

PLACE, PURPOSE AND FORMS OF DATA PROCESSING

Any processing related to the web services offered on this website is carried out by the registered office of the processing owner's company, exclusively by collaborators or shareholders of *Zcube S.r.l.* entrusted with the processing or by other employees responsible for maintenance procedures.

Through the Company query forms, users can enter personal information:

- To contact *Zcube S.r.l.* and request information on services,
- To make a partnership with *Zcube S.r.l.*
- To submit a research project.

The Company will manage the data provided to respond to requests or provide clarifications on services and to evaluate any consulting/advisory or partnering proposition and these data will not be communicated to third parties, unless if such communication is required by law or is strictly necessary to meet users' requests.

The data of the subjects who intend to present the research projects and the information they enter will be managed for the evaluation of the projects and for the execution of the program and may be transmitted to other companies of the Zambon group and to partner companies of *Zcube S.r.l.* for Open Accelerator; the contact details of these subjects, with the consent of the interested parties, will become part of the Open Accelerator mailing list for sending newsletters.

Except in the aforementioned cases, the data deriving from web services will not be communicated

or disclosed in any way.

The user is free to provide personal data in the Company query forms. Failure to provide the required information indicated by an asterisk may make the data processing impossible and, therefore, the formulation of a response.

TYPE OF DATA PROCESSED

Browsing Data

Computer systems and software programs designed for navigation on this website acquire during their normal use certain personal data, whose transmission is implicit in the use of Internet communication protocols.

These data are not collected with a specific reference to the identified users but, given their nature, they could enable the users' identification through processes and associations with data held by third parties, carried out only at explicit request of judicial authorities.

This category of data includes IP addresses or domain names of computers used by users visiting the website, URIs (Uniform Resource Identifier), request times, methods used to send requests to the server, the size of the files received in response, numeric codes indicating the status of the server's response (successful, error, etc.) and other parameters related to the user's operating system and computer environment.

These data, which are deleted immediately after processing, are used by *Zcube S.r.l.* for the sole purpose of collecting anonymous statistical information on the use of the web site and to monitor its correct functioning.

They may be used to ascertain liabilities in case of Internet violations that could damage the website; notwithstanding this outcome, all data on web contacts shall expire within seven days.

Data provided voluntarily by the User

The optional, explicit and voluntary submission of an e-mail address on the website implies the subsequent acquisition of the personal data provided, such as the e-mail address of the sender used by *Zcube S.r.l.* only to respond to that user's queries. Your data will not be disclosed and will be stored by our Company only for the period necessary to follow up your request. Detailed reports shall be given or displayed on the pages of the website intended for particular on-demand services.

COOKIES

The website www.openaccelerator.it uses cookies. As explained by the Data Protection Authority in its FAQ of December 2012 available at www.garanteprivacy.it, cookies are "small text files" – consisting of letters and numbers - "that the websites visited by users *send to their terminals (usually the browser), where they are stored for subsequent retransmission to the same websites at the time of the same user's next visit*". The function of the cookies is to streamline web traffic analysis or indicate when a specific website or part of it is visited, and to classify visitors in order to provide personalized contents. They help administrators to improve the website and the users' navigation experience.

Cookies do not allow us to access other information stored on your device, even if cookies are downloaded here. Cookies cannot upload codes of any type or carry viruses or malware, and they do not harm the user's terminal.

[Afterwards](#), all the information installed on the cookies through this website shall be available, as well as any necessary instruction to manage your preferences on the matter.

FORMS OF PROCESSING

Personal data are processed on paper and/or using automatic instruments for the time necessary to achieve the aims for which data are collected.

Specific security measures are observed to prevent data loss, illicit or incorrect use of data and unauthorized access.

Internet communications such as e-mail or webmail may pass through different nations before their sending to the recipients concerned. *Zcube S.r.l.* shall not be liable for any unauthorized access or loss of personal data not under its control.

RIGHTS OF DATA SUBJECTS

Individuals submitting personal data have the right to request confirmation of the existence of such data and to ascertain their content or origin, as well as to verify their accuracy or to request their integration, updating or rectification at any time, pursuant to the General Data Protection Regulation (EU) 679/2016.

Data subjects may request any data processed in violation of the law to be erased, made anonymous or blocked and, for legitimate reasons, may appeal against its processing.

You can exercise your rights by writing an e-mail at info@openaccelerator.it

In case of violation of law during the processing of your personal data, you can lodge a complaint to the competent control authority (in Italy this authority is called “Garante per la protezione dei dati personali” - Italian Data Protection Authority, notwithstanding the possibility to bring proceedings before the competent judicial authority.