Privacy Notice on the Processing of Personal Data of Customers, Prospective Customers and Business Contacts

Rev. 01.01 – 13/11/2026

Pursuant to Article 13 of Regulation (EU) 2016/679 ("GDPR")

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1. Data Controller

The Data Controller is:

IPSES S.r.l.
Registered Office: Piazzale Giulio Cesare 9, 20145 Milan, Italy

For any request concerning the processing of personal data or to exercise the rights granted under Regulation (EU) 2016/679, you may contact the Data Controller at:

E-mail: privacy@ipses.com

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2. Purposes and Legal Bases of Processing

Personal data are processed for the following purposes.

a) Management of contact requests and pre-contractual activities

- handling requests for information;
- organizing meetings and commercial activities;
- preparing quotations and proposals;
- assessing the feasibility of projects and activities.

Legal basis: performance of pre-contractual measures taken at the request of the data subject (Art. 6(1)(b) GDPR).

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b) Management of the contractual relationship

- management of projects and orders;
- provision of services;

- technical assistance and customer support;
- management of project and operational activities;
- management of communications related to the contractual relationship.

Legal basis: performance of a contract (Art. 6(1)(b) GDPR).

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c) Administrative, accounting and tax compliance

- invoicing;
- management of collections and payments;
- fulfillment of accounting, tax and administrative obligations;
- compliance with laws, regulations or requirements imposed by competent authorities.

Legal basis: compliance with a legal obligation (Art. 6(1)(c) GDPR).

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d) Protection of the Controller's rights

- management of disputes and claims;
- establishment, exercise or defense of legal rights in judicial or extra-judicial proceedings;
- protection of the assets and legitimate interests of IPSES S.r.l.

Legal basis: legitimate interest of the Data Controller (Art. 6(1)(f) GDPR).

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3. Categories of Personal Data Processed

The Data Controller may process:

- identification data;
- contact details (telephone number, e-mail address, business address);
- information relating to the professional role and organization of the data subject;
- administrative and accounting data;
- technical and operational data necessary for the execution of the requested or commissioned activities.

IPSES S.r.l. does not ordinarily process special categories of personal data under Article 9 GDPR or criminal conviction and offence data under Article 10 GDPR within the scope of the activities covered by this notice.

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4. Provision of Personal Data

The provision of personal data necessary for carrying out pre-contractual and contractual activities is voluntary but necessary in order for IPSES S.r.l. to provide the requested services.

Failure to provide such data may make it impossible to respond to requests received or to establish and manage the contractual relationship.

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5. Methods of Processing

Personal data are processed using paper-based, electronic and telematic means, in compliance with the principles of lawfulness, fairness, transparency, data minimization and confidentiality established by the GDPR.

IPSES S.r.l. implements appropriate technical and organizational measures to ensure the security, integrity, availability and confidentiality of personal data.

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6. Recipients of Personal Data

Personal data may be disclosed to parties acting either as independent Data Controllers or Data Processors, including:

- consultants and professional advisors;
- technical collaborators;
- testing laboratories and certification bodies involved in the performance of activities;
- IT service providers and operational support providers;
- banking institutions;
- parties involved in the execution of projects and services;
- public authorities and supervisory bodies where required by law.

An updated list of Data Processors is available from the Data Controller upon request.

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7. Transfers of Personal Data to Third Countries

The use of IT services and collaborative platforms may involve the processing of personal data by service providers operating outside the European Economic Area (EEA).

In such cases, transfers are carried out in compliance with Articles 44 et seq. of the GDPR and through the implementation of the safeguards required by applicable data protection legislation.

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8. Data Retention Period

Personal data will be retained:

- for the duration of pre-contractual and contractual activities;
- for the period required by applicable administrative, accounting and tax obligations;
- for the time necessary to protect the rights of the Data Controller.

In particular:

- contractual, administrative and tax documentation: for the period required by applicable laws and, in any case, for no less than 10 years;
- unsuccessful quotations and pre-contractual documentation: 10 years from the conclusion of the relevant negotiations, for the purposes of commercial and technical records and the protection of the Controller's rights; the personal data contained therein are limited to the name of the customer's contact person.

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9. Data Subject Rights

Data subjects may exercise at any time the rights provided for by Articles 15-22 of the GDPR, including:

- the right of access to personal data;
- the right to rectification of inaccurate data;
- the right to erasure, where applicable;
- the right to restriction of processing;
- the right to data portability;
- the right to object to processing where permitted by law;
- the right not to be subject to automated decision-making.

Requests may be submitted using the contact details provided in this notice.

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10. Right to Lodge a Complaint with a Supervisory Authority

Data subjects have the right to lodge a complaint with the competent Data Protection Supervisory Authority pursuant to Article 77 GDPR if they believe that the processing of their personal data infringes applicable data protection legislation.

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11. Automated Decision-Making

IPSES S.r.l. does not carry out automated decision-making processes, including profiling, that produce legal effects concerning data subjects or similarly significantly affect them, pursuant to Article 22 GDPR.