The present version is a courtesy translation only. In case of any discrepancy or conflict between the English and the Italian versions, the Italian version shall prevail.

PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA
ASI E-COMMERCE PORTAL – INSTITUTIONAL MERCHANDISING

pursuant to Art. 13 of Regulation (EU) 2016/679 (GDPR)

INTRODUCTION AND STRUCTURE OF THE NOTICE

This privacy notice is provided by the Italian Space Agency to the users of the e-commerce portal intended for the sale of institutional merchandising products, pursuant to Art. 13 of Regulation (EU) 2016/679 (hereinafter: the GDPR).

Configuration of the privacy roles. The e-commerce portal is operated by ASI as data controller for the purposes of administering and supervising the platform. The products offered for sale are manufactured and sold by third parties, Licensees of the ASI trademark (hereinafter: the Licensees or Sellers), which act as independent data controllers for the purposes of sale, logistics and invoicing. No joint controllership pursuant to Art. 26 GDPR exists between ASI and the Licensees.

Structure of the notice. In order to ensure maximum transparency as to the controllership of the processing activities, this notice is divided into two separate sections:

- Section A: processing activities carried out by ASI for the management of the e-commerce portal;
- Section B: processing activities carried out by the Licensees for the sale of the products.

SECTION A – PROCESSING ACTIVITIES CARRIED OUT BY ASI

1) DATA CONTROLLER AND DATA PROTECTION OFFICER

The data controller for the processing activities referred to in this Section A is the ITALIAN SPACE AGENCY – ASI, with registered office in Rome, Via del Politecnico s.n.c., certified email address (PEC): asi@asi.postacert.it.

The Data Protection Officer (DPO) appointed pursuant to Art. 37 GDPR can be reached at the email address: rpd@asi.it.

2) PURPOSES OF THE PROCESSING, DATA PROCESSED AND LEGAL BASES

Personal data collected from the data subject are processed by ASI for the following purposes, each based on a specific legal basis pursuant to Art. 6 GDPR:

a) User account management and access control

Purpose: creation and management of the user's personal account, authentication by means of access credentials, control of access to the portal functionalities reserved for registered users, management of authenticated browsing sessions.

Data processed: first name, surname, email address, password (stored exclusively in encrypted form by means of one-way hashing algorithms), technical session and authentication cookies.

Legal basis: necessity to carry out pre-contractual measures taken at the data subject's request, pursuant to Art. 6(1)(b) GDPR. Registration constitutes a pre-contractual measure necessary to enable the user to subsequently purchase products through the Licensee sellers present on the portal.

b) Aggregate statistical analysis and monitoring of portal usage

Purpose: aggregate and anonymised analysis of how the portal is used, by means of Google Analytics, for the purposes of monitoring the effectiveness of institutional communication initiatives, identifying any technical or usability issues, optimising the user experience and continuously improving the digital services offered by the Agency.

Data processed: IP address in anonymised form (last octet masked), browser type and version, operating system, device used (desktop/tablet/smartphone), pages visited, browsing sequence, access times, session duration, geographic origin aggregated at metropolitan-area level, traffic source (search engine, direct link, referral). The data are collected and processed exclusively in aggregate form, without any possibility of tracing back to the identity of the individual user.

Legal basis: necessity for the performance of a task carried out in the public interest pursuant to Art. 6(1)(e) GDPR. The e-commerce portal constitutes an instrument of institutional communication for disseminating the values of the Italian Space Agency and promoting scientific culture among the general public, in implementation of the institutional purposes set out in the applicable sector legislation. Aggregate monitoring by means of analytics tools is necessary in order to assess the effectiveness of digital communication initiatives and to comply with the obligations of optimisation and continuous improvement of public digital services laid down by the Digital Administration Code (Legislative Decree 82/2005, Art. 7) and by the AgID Guidelines on the design, accessibility and usability of public administration websites.

c) Sending of periodic institutional communications

Purpose: sending of newsletters and institutional communications by email concerning the initiatives of the Italian Space Agency, events organised or sponsored by it, new items in the range of merchandising products available on the portal, coordinated promotions proposed by the Agency to the Licensees, and platform updates.

Data processed: email address, first name and surname (for personalisation of communications), any thematic preferences expressed by the user, statistics on the opening of and interaction with communications (email opening, clicks on links).

Legal basis: consent of the data subject pursuant to Art. 6(1)(a) GDPR. The granting of consent is entirely optional and may be withdrawn at any time, without any need to provide a reason, by means of the unsubscribe link included in every communication or by writing directly to rpd@asi.it. The withdrawal of consent does not affect the lawfulness of processing based on consent given before its withdrawal and does not entail any negative consequence for the use of the portal.

d) IT security and prevention of unauthorised access

Purpose: monitoring of access to the portal, detection of anomalous conduct or conduct potentially harmful to the integrity and availability of the IT systems, identification of unauthorised access attempts, prevention of cyberattacks, implementation of technical and organisational security measures appropriate to the level of risk.

Data processed: users' IP addresses, access timestamps, endpoints requested, user agent, any anomalies detected in access patterns, authentication activity logs (successful and failed attempts), technical data on the client's security configuration. The data are stored in the system security logs.

Legal basis: compliance with a legal obligation pursuant to Art. 6(1)(c) GDPR and necessity for the performance of a task carried out in the public interest pursuant to Art. 6(1)(e) GDPR. Public administrations are required to adopt appropriate technical and organisational measures to ensure a level of security appropriate to the risk, in accordance with Art. 32 GDPR. There are also specific legal IT security obligations laid down by the Digital Administration Code (Legislative Decree 82/2005, Arts. 50-bis and 51 on the security and availability of data, systems and infrastructures), by the Minimum ICT Security Measures for public administrations (AgID Circular No. 2/2017, Annex 1) and by the rules on the national cybersecurity perimeter (Decree-Law 105/2019, converted with amendments by Law 133/2019, for the entities included in the perimeter). The security of the IT systems of public administrations also constitutes a task carried out in the public interest, instrumental to the proper and continuous performance of institutional functions and to the protection of the rights of data subjects.

e) Compliance with legal and regulatory obligations

Purpose: compliance with obligations laid down by laws, regulations or European Union legislation applicable to public administrations, in particular in the areas of administrative transparency, accessibility of public websites, digital document retention, and public accounting.

Data processed: the data necessary to comply with the specific legal obligation, varying according to the nature of the obligation. By way of example: transaction data for accounting purposes, access data for accessibility verification, document metadata for compliant digital retention.

Legal basis: compliance with a legal obligation pursuant to Art. 6(1)(c) GDPR. In particular: Legislative Decree 33/2013 (reorganisation of the rules on the right of civic access and the obligations of publicity, transparency and dissemination of information by public administrations); Law 4/2004 and Legislative Decree 82/2005, Art. 53-bis (accessibility of websites and mobile applications of public bodies); Legislative Decree 82/2005, Chapters II and III (electronic documents, digital signatures and digital retention); legislation on public accounting.

f) Establishment, exercise or defence of legal claims in judicial or administrative proceedings

Purpose: protection of the Agency's financial and institutional interests in the event of disputes, administrative proceedings, arbitration or litigation, whether as claimant or as defendant. Handling of claims for damages, objections and formal complaints that may give rise to litigation.

Data processed: the personal data already collected for the purposes indicated above (account, browsing, communications) to the extent necessary to establish the facts, to substantiate the Agency's position or to defend against third-party claims. No additional data are collected specifically for this purpose.

Legal basis: performance of a task carried out in the public interest pursuant to Art. 6(1)(e) GDPR. The protection of the financial and institutional interests of the public body in judicial or administrative proceedings constitutes an activity necessary for the pursuit of its institutional purposes and for the sound management of the public resources entrusted to the Agency. The processing is also necessary in order to allow the exercise of the right of defence guaranteed by Art. 24 of the Constitution of the Italian Republic, which constitutes an overriding public interest also for public bodies.

Scope of ASI's processing activities. It is specified that ASI, in its capacity as operator of the e-commerce portal, neither processes nor has access to personal data relating to purchase orders, payment transactions, shipments and invoicing. Such data are collected and processed exclusively by the Licensee sellers in their capacity as independent data controllers, as specified in Section B of this notice.

3) CATEGORIES OF RECIPIENTS OF THE PERSONAL DATA

The personal data processed by ASI pursuant to Section A of this notice may be disclosed, to the minimum extent necessary to pursue the purposes of the processing, to the following categories of recipients:

a) Data processor pursuant to Art. 28 GDPR: TINCX SRL (VAT No. 02961160211), with registered office at Via Bruno Buozzi 6, 39100 Bolzano (BZ), appointed as data processor pursuant to Art. 28 GDPR in its capacity as supplier of the technical services of development, ordinary and extraordinary maintenance, ongoing technical support and hosting of the e-commerce portal. The processor processes personal data exclusively on behalf of ASI, in accordance with the instructions documented in the appointment agreement pursuant to Art. 28 GDPR entered into between the parties, without any decision-making autonomy as to the purposes and essential means of the processing;

b) Google LLC: supplier of the Google Analytics service. Google LLC acts as an independent controller for the purposes of providing the analytics service, in accordance with its own privacy policy available at https://policies.google.com/privacy. Google is certified under the EU-U.S. Data Privacy Framework;

c) persons authorised to process data pursuant to Art. 29 GDPR: employees or collaborators of the Italian Space Agency acting under the direct authority of the controller, responsible for the technical, administrative and operational management of the portal, duly trained on confidentiality obligations and instructed on the correct conduct to be adopted in the processing of personal data, in accordance with Art. 29 GDPR and Art. 2-quaterdecies of Legislative Decree 196/2003;

d) public authorities, supervisory bodies and judicial authorities: in the cases provided for by specific legal provisions or upon mandatory request made by such authorities in the exercise of their functions, for compliance with legal obligations incumbent on the controller or for the exercise/defence of legal claims in judicial or administrative proceedings. By way of example: the Italian Data Protection Authority, the Judicial Authority, the Public Prosecutor's Office, judicial police bodies, the Agency for Digital Italy (AgID), the Court of Auditors.

Publication for administrative transparency purposes. In compliance with the obligations laid down by Legislative Decree 33/2013, certain personal data may be published in the "Amministrazione Trasparente" (Transparent Administration) section of the Italian Space Agency's institutional website (www.asi.it), in the cases and in the manner expressly provided for by transparency legislation. Such publication constitutes dissemination of personal data for reasons of substantial public interest, in accordance with Art. 2-ter of Legislative Decree 196/2003 as

amended by Legislative Decree 101/2018 and in compliance with the limits set by the principle of data minimisation pursuant to Art. 5(1)(c) GDPR.

4) TRANSFERS OF DATA TO THIRD COUNTRIES

For the provision of the Google Analytics service, services supplied by Google LLC, a company with its principal place of business in the United States of America, are used. Consequently, certain personal data in aggregate and anonymised form may be transferred to the United States.

Appropriate safeguards for the transfer. The transfer of personal data to the United States of America is carried out on the basis of the following appropriate safeguards pursuant to Chapter V of the GDPR:

- Adequacy decision of the European Commission: EU-U.S. Data Privacy Framework, adopted by Commission Implementing Decision (EU) 2023/1795 of 10 July 2023. Google LLC is certified under the Data Privacy Framework;
- standard contractual clauses approved by the European Commission pursuant to Art. 46(2)(c) GDPR, included in the contracts between the controller and Google LLC;
- supplementary protection measures implemented: anonymisation of users' IP addresses prior to the transfer of the data (masking of the last octet), processing of the data exclusively in aggregate form, minimisation of the data collected, limitation of retention periods.

In order to obtain a copy of the appropriate safeguards implemented for transfers to third countries, or to receive information on where they have been made available, the data subject may write to the data controller at the addresses indicated in point 1) of this notice, or consult directly the contractual documentation and the privacy policy of Google LLC at https://policies.google.com/privacy.

5) AUTOMATED DECISION-MAKING AND PROFILING

The personal data of portal users may be subject to automated analysis by the IT security systems implemented by the Agency, in order to identify anomalous conduct, suspicious access patterns or activities potentially harmful to the integrity, availability and confidentiality of the systems and of the data processed.

Absence of automated decisions producing legal effects. It is nevertheless specified that no decision producing legal effects concerning the data subject or similarly significantly affecting them is taken solely on the basis of such automated processing. Any restrictive measure (for example, temporary suspension of the account, blocking of access) that may result from automated analysis will always be preceded by a qualified human assessment, taking into account the specific context, the circumstances of the individual case and any justifications provided by the data subject.

Exclusion of profiling. The Italian Space Agency does not carry out any profiling of portal users within the meaning of Art. 22 GDPR. The aggregate analyses carried out by means of Google Analytics have exclusively statistical purposes and do not entail the creation of individual user profiles.

6) RETENTION PERIOD OF PERSONAL DATA

The personal data processed by the Italian Space Agency are retained for differentiated periods depending on the specific purpose pursued and in compliance with the principles of storage limitation and data minimisation:

a) user account data: registration data are retained until the account is voluntarily deleted by the user, which may be done independently from the personal area or by sending a request to rpd@asi.it. Accounts that have remained inactive (no logins) for a period exceeding 36 consecutive months may be deactivated by the Agency following notice sent to the email address associated with the account, with 30 days' advance notice. Deletion of the account entails the definitive and irreversible erasure of all associated data, save for the need to retain data in order to comply with legal obligations or for the defence of legal claims;

b) browsing data (Google Analytics): the data collected in aggregate and anonymised form are retained for a maximum period of 26 months from collection, in accordance with the default configuration of Google Analytics, which complies with the recommendations of the Italian Data Protection Authority and with industry best practice. At the end of that period, the data are automatically deleted from Google's servers;

c) newsletter data: the email addresses of users subscribed to the newsletter are retained until the data subject withdraws consent, which may be done at any time by means of the unsubscribe link included in every communication or by writing to rpd@asi.it. Withdrawal of consent entails the immediate cessation of the sending of communications and the deletion of the email address from the distribution list within 48 working hours;

d) security logs: the logs containing access to the portal, IP addresses and other technical information collected for IT security purposes are retained for a maximum period of 12 months from recording. Once that period has elapsed, the logs are automatically deleted from the systems, unless their retention becomes necessary in order to establish specific breaches of the law or of the portal regulations, in which case retention continues, limited to the relevant logs, until the conclusion of the proceedings.

At the end of the respective retention periods, personal data are erased securely and irreversibly, or rendered permanently anonymous by means of anonymisation techniques that prevent any future re-identification. Anonymised data may be used by the Agency for aggregate statistical purposes, without any possibility of tracing back to the identity of the data subjects.

Retention for litigation purposes. It is not possible to determine in advance the specific retention period for personal data processed for the purposes of establishing, exercising or defending legal claims in judicial or administrative proceedings, since that period depends on the duration of the proceedings and on the limitation periods laid down by the applicable civil, procedural and administrative legislation (which may range from 5 to 10 years depending on the nature of the right protected). Such data will be retained for as long as is strictly necessary to pursue the aforementioned purposes, including the ordinary or special limitation periods, and will subsequently be erased.

7) NATURE OF THE PROVISION OF DATA AND CONSEQUENCES OF FAILURE TO PROVIDE IT

Account registration data. The provision of the personal data necessary for the creation of the user account (first name, surname, email address, password) is optional, since the user is free to choose whether or not to register on the portal. However, failure to provide such data results in the technical impossibility of completing registration and, consequently, in the impossibility of subsequently purchasing products through the Licensee sellers present on the portal, given that registration constitutes a necessary prerequisite for identifying the purchaser in the checkout process.

Newsletter. The granting of consent for the sending of periodic institutional communications is entirely optional and discretionary. Failure to give consent, or its subsequent withdrawal, does not in any way prevent registration on the portal, browsing or the making of purchases. The user will suffer no negative consequence from failing to give, or from withdrawing, consent.

Browsing data and cookies. Browsing data are collected automatically for technical, security and service-improvement purposes. Users may configure their browser to block third-party analytics cookies (Google Analytics) by following the browser-specific instructions available in the portal's Cookie Policy. Such a configuration, although legitimate, may result in a limitation of certain non-essential functionalities of the portal or in a sub-optimal user experience.

Processing for the defence of legal claims. The personal data used for establishing, exercising or defending legal claims in judicial or administrative proceedings are those already collected for the primary purposes indicated above (account management, browsing, communications). The data subject may not refuse to provide such data or request their immediate erasure while proceedings are ongoing. However, the data subject may exercise the right to object to the processing on grounds relating to their particular situation, pursuant to Art. 21(1) GDPR, as specified in point 8) below. The controller will assess the request by balancing the interests at stake and will refrain from further processing the data unless it demonstrates the existence of compelling legitimate grounds for the processing which override the interests of the data subject.

8) RIGHTS OF DATA SUBJECTS AND HOW TO EXERCISE THEM

As a data subject, you have the right to exercise specific rights vis-à-vis the data controller. You may request access to your personal data, obtain their rectification in the event of inaccuracies, or their erasure where the conditions laid down by the Regulation are met. You also have the right to obtain restriction of processing in the cases provided for by Art. 18 GDPR and the right to data portability in the cases provided for by Art. 20 GDPR.

You also have the right to object to the processing of your personal data based on the necessity for the performance of a task carried out in the public interest, pursuant to Art. 21(1) GDPR, setting out the grounds relating to your particular situation which justify the objection, unless there are compelling and overriding legitimate grounds for the controller to continue the processing, and unless the processing is necessary for the establishment, exercise or defence of legal claims.

Where applicable, you have the right to withdraw the consent given at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

Should you consider that the processing of your personal data is carried out in breach of the Regulation, you may lodge a complaint with the Italian Data Protection Authority (Garante per la Protezione dei Dati Personali), as provided for by Art. 77 GDPR, or bring the matter before the competent judicial authorities pursuant to Art. 79 GDPR.

To exercise your rights, you may contact the Data Protection Officer at the email address rpd@asi.it.

SECTION B – PROCESSING ACTIVITIES CARRIED OUT BY THE LICENSEES

The merchandising products offered through the e-commerce portal are manufactured and marketed by independent third parties (Licensees of the ASI trademark) which act as independent data controllers for all purposes connected with the sale, logistics, invoicing and management of the commercial relationship with the purchaser. The Licensees are neither sub-processors nor joint controllers with ASI, but rather independent controllers for their own distinct commercial purposes.

1) CONTROLLERSHIP OF THE PROCESSING FOR SALES

Each Licensee is an independent data controller in respect of the processing of purchasers' personal data for the purposes relating to the sale of its own products. No joint controllership pursuant to Art. 26 GDPR exists between ASI and the Licensees, given the clear separation of the purposes pursued and the decision-making autonomy of each entity. The full identity of the Licensee seller, its contact details and a reference to its privacy notice pursuant to Art. 13 GDPR are indicated: in the product sheet (accessible before purchase), in the order confirmation sent by email, on the invoice issued, and in the applicable terms and conditions of sale. It is the exclusive responsibility of each Licensee to provide purchasers with its own complete, GDPR-compliant privacy notice. ASI is not liable for any failure by the Licensees to comply with their information obligations.

2) CATEGORIES OF DATA PROCESSED, PURPOSES AND LEGAL BASES

The Licensees typically process the following categories of personal data: identification and contact data (first name, surname, email, telephone), shipping data (full delivery address), billing data (for individuals: first name, surname, tax code, address; for companies: company name, VAT number, address, recipient code/PEC), order data (products, quantities, prices, amounts, date). Payment data (card, PayPal) are handled directly by the payment service providers (PayPal LLC, Stripe Inc.) as independent controllers; the Licensees receive only confirmation of the outcome of the transaction. The purposes include: performance of the sales contract (order management, shipping, invoicing), after-sales management (returns, warranties, complaints), customer support, tax and accounting compliance (10-year retention), defence of legal claims, and, where applicable, commercial communications subject to consent. The legal bases are: necessity for the performance of the contract (Art. 6(1)(b) GDPR), necessity for compliance with a legal obligation (Art. 6(1)(c) GDPR), and consent for commercial communications (Art. 6(1)(a) GDPR). For further details, please consult the Licensee's privacy notice.

3) SYSTEM ARCHITECTURE AND DATA FLOW

The portal uses a checkout system designed to ensure the operational autonomy of each Licensee and the separation of data flows. A separate and independent order is created for each Licensee present in the shopping cart. Order data are transmitted exclusively to the Licensee seller. Payments are made directly into the Licensees' accounts (each has its own PayPal/Stripe account), without any financial intermediation by ASI. Shipping costs are calculated separately for each Licensee. ASI provides the technological infrastructure but does not acquire, does not store and does not have access to data relating to orders, payments, shipments and invoices, which remain within the exclusive control of the Licensees.

4) EXERCISE OF DATA SUBJECTS' RIGHTS

In order to exercise the rights under Arts. 15-22 GDPR (access, rectification, erasure, restriction, portability, objection) in relation to the data processed by the Licensees for sales purposes, the data subject must contact the Licensee seller directly, using the contact details indicated in the order confirmation and in the relevant privacy notice. ASI is neither controller nor processor in respect of such processing and is therefore not competent to handle requests relating to data processed autonomously by the Licensees. Requests erroneously sent to ASI will be forwarded to the competent Licensee, with a possible resulting delay in the response. For complaints relating to processing by the Licensees, please contact the Italian Data Protection Authority (www.garanteprivacy.it).

INFORMATION ON COOKIES AND SIMILAR TECHNOLOGIES

The e-commerce portal uses technical cookies strictly necessary for the operation of the site (session cookies for user authentication, cookies for maintaining the shopping cart) and third-party analytics cookies (Google Analytics with IP anonymisation). For detailed information on the cookies used, the purposes pursued, their technical operation, how to manage preferences and instructions for disabling analytics cookies, please consult the dedicated Cookie Policy available at: [INSERT COOKIE POLICY LINK].

UPDATES TO THIS NOTICE

This notice may be updated periodically in order to reflect regulatory, organisational or technological changes affecting the processing of personal data carried out by the Agency. The updated version will be published on the portal, indicating the date of the latest update. In the event of substantial changes entailing new processing purposes or significant changes to the conditions of processing, registered users will be informed by means of a communication sent to the email address provided at registration, with reasonable advance notice before the changes take effect.

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Notice updated as at 17 April 2026
Version: 1.0

INFORMATION NOTICE ON THE PROCESSING OF PERSONAL DATA

(Privacy Policy)

pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 (GDPR)

Last amended: 14 May 2026

Disclaimer: The present version is a courtesy translation only. In case of any discrepancy or conflict between the English and the Italian versions, the Italian version shall prevail.

Article 1. Data Controller and contact details

1.1. The Controller of the personal data collected in the context of sales, logistics, order management, after-sales, and commercial communications activities is:

Let's do Print di Alex Pepe (hereinafter, the "Controller" or the "Concessionaire") Registered office: Via Antonio Segni 24, 82100 Benevento (BN), Italy VAT number: IT01803330628 Tax code: PPELXA96M07A783B Certified email (PEC) dedicated to privacy requests: letsdoprint@pec.it Portal URL: shop.asi.it

1.2. The Controller operates in its capacity as official Concessionaire of the Italian Space Agency (hereinafter, "ASI") for the production and commercialization of merchandising products bearing the "ASI" trademark, by virtue of License Agreement No. SAC 334/2025-224-S.0. For the purposes of the present notice, it is necessary to distinguish the following roles:

\(a\) The **Italian Space Agency**, with offices at Via del Politecnico s.n.c., 00133 Rome, Tax code 97061010589, is the exclusive owner of the "ASI" trademark and the technical manager of the e-commerce portal infrastructure (hereinafter, the "Portal"). For the processing activities connected with the technical management of the Portal, the security of the platform, institutional supervision, trademark protection, and the aggregate statistical analyses on the use of the Portal, ASI operates as an Autonomous Controller of the processing in accordance with its own framework privacy notice, to which reference is made for the relevant purposes, legal bases, categories of data, recipients, and retention periods.

(b) **Let's do Print di Alex Pepe** operates as an Autonomous Controller of the processing exclusively for the activities of sales, logistics, invoicing, after-sales, order management, customer service, and marketing communications (newsletter), in observance of Article 15.4 of the License Agreement, which establishes that each Party operates as an autonomous controller of the processing with every consequence in point of law as to the regulatory obligations and the responsibilities towards data subjects.

1.3. The Controller has not proceeded with the appointment of a Data Protection Officer (DPO) in light of the size and the nature of the sole proprietorship, the conditions provided by Article 37 of Regulation (EU) 2016/679 not being met. The point of contact for the exercise of data subjects' rights is the PEC address indicated in paragraph 1.1.

Article 2. Categories of personal data processed

2.1. The Controller collects and processes the following categories of personal data, in relation to the activities carried out through the Portal:

(a) Identifying and contact data: name, surname, address of residence or domicile, tax code and/or VAT number (where the purchase takes place with the issuance of an invoice), telephone number, email address.

(b) Billing and shipping data: denomination or business name (for professional clients), billing address, delivery address, postal code, data necessary for the issuance of the fiscal document pursuant to Presidential Decree No. 633 of 26 October 1972.

(c) Data relating to orders and transactions: details of the Products purchased, amounts, payment method used, date and number of the order, any communications relating to returns, complaints, and after-sales assistance. The Controller does not access the complete data of the payment instrument, such as the full card number, security codes, or payment credentials. Such data are handled exclusively by the payment-service providers through PCI DSS protocols and standards, and do not transit or remain stored on the servers of the ASI infrastructure. The

Controller receives only the information necessary to confirm the outcome of the transaction and to manage the order.

(d) Technical navigation data and aggregate analytics: within the Portal, data relating to the user's navigation may be processed, such as anonymized IP address, browser type, operating system, device used, pages visited, and session data. The data collected for technical, security, and proper-functioning purposes of the platform are processed in accordance with the respective roles indicated in the present notice and in ASI's framework privacy notice. The aggregate statistical analyses by means of Google Analytics, configured with masking of the IP address and without purposes of individual profiling, are carried out by ASI as Autonomous Controller of the processing. The Controller does not use Meta Pixel, Microsoft Clarity, Google Ads, targeted-advertising tools, or other behavioural tracking pixels on the ASI infrastructure.

(e) Data for commercial communications (newsletter): email address voluntarily provided by the user through the dedicated newsletter subscription form, as well as statistical data relating to interaction with the communications sent, such as email openings, clicks on the links present in the messages, and the date and time of the interaction, where detected by means of tracking pixels or tracked links made available by the Klaviyo platform.

Article 3. Purposes and legal bases of the processing

The personal data are processed by the Controller for the following purposes, to each of which the relevant legal basis is associated pursuant to Article 6 of Regulation (EU) 2016/679:

3.1. Performance of the contract of sale (Article 6(1)(b) GDPR)

The processing of the data referred to in Article 2, letters (a), (b), and (c), is necessary for the performance of the distance sales contract concluded with the Customer, as well as for the adoption of pre-contractual measures at the Customer's request. Falling within this purpose are the management of the order, the processing of payment, the preparation and shipping of the Products, invoicing, the management of returns and of the right of withdrawal, as well as the provision of after-sales assistance and the management of the legal guarantee of conformity. The provision of data for this purpose is a necessary condition for the conclusion and performance of the contract; in the absence of such data, the Controller will be unable to fulfil the order.

3.2. Compliance with legal obligations (Article 6(1)(c) GDPR)

The processing of the identifying, billing, and transaction-related data is also necessary for compliance with obligations provided by the applicable fiscal, accounting, and tax legislation, with particular reference to Presidential Decree No. 633/1972 on VAT, to Presidential Decree No. 600/1973 on income taxes, to Article 2220 of the Civil Code on the retention of accounting records, as well as to anti-money-laundering legislation where applicable. The provision of data for this purpose is mandatory, as it is imposed by law.

3.3. Sending of commercial communications and newsletter (Article 6(1)(a) GDPR)

The processing of the email address for the sending of communications of a promotional, commercial, and informational nature relating to the ASI-branded Products, including the Concessionaire's periodic newsletter, is based on the express, free, specific, informed, and unequivocal consent of the data subject. Such consent is collected by means of a dedicated form or a dedicated selection box, technically and graphically distinct from registration with the Portal, from the creation of the account, and from the purchase procedure. The consent for marketing purposes is not pre-selected, is not bundled with other consents, and must be clearly attributable to Let's do Print di Alex Pepe as the sole Controller of the processing for that purpose. The newsletter management and sending service operates through Klaviyo, Inc., in external autonomy with respect to ASI's databases. The communications sent through Klaviyo may include statistical tools, such as tracking pixels and tracked links, intended to detect email openings, clicks on links, the date and time of the interaction, and the aggregate performance of the campaigns, in order to verify the effectiveness of the communications sent and to correctly manage the distribution list. The data provided for newsletter subscription and the statistical data connected with interactions with the communications are directed to the Klaviyo platform and are not handled by ASI for its own purposes. The provision of data for this purpose is entirely optional; failure to provide it does not in any way prejudice registration with the Portal, navigation, the purchase of the Products, or access to after-sales services. Consent may be revoked at any time, without prejudice to the lawfulness of the processing carried out prior to

the revocation, by means of a written communication to the PEC address letsdoprint@pec.it or through the dedicated unsubscribe link present in each communication.

3.4. Technical functioning of the Portal (Article 6(1)(f) GDPR)

The processing of technical navigation data, insofar as it is attributable to the Controller and to identifiable persons, is based on the legitimate interest of the Controller in ensuring the correct performance of sales activities, the secure management of orders, the prevention of fraud and abuse, as well as the resolution of technical anomalies connected with the purchase and after-sales process. The processing carried out by ASI, as Autonomous Controller, for the security, technical administration of the Portal, and aggregate statistical analyses by means of anonymized Google Analytics, remains distinct, in accordance with what is indicated in ASI's framework privacy notice. The Controller does not determine the purposes and the essential means of the statistical processing carried out by ASI, and does not access analytics data capable of identifying the individual user.

Article 4. Profiling and automated decision-making

4.1. As at the date of the present notice, the Controller does not carry out any profiling activity of users pursuant to Article 22 of Regulation (EU) 2016/679. No targeted-advertising tools, Meta Pixel, Microsoft Clarity, Google Ads, personalized Product-recommendation systems, or other behavioural-monitoring pixels are active at the Controller's initiative. The Portal may include Google Analytics configured by ASI in anonymized and aggregate form for statistical purposes and for institutional monitoring of the use of the platform. Such tool is not used by the Controller to profile users, to reconstruct individual purchasing habits, or to adopt automated decisions producing legal effects or similarly significant effects on the data subject.

4.2. Should the Controller intend, in the future, to introduce profiling tools, third-party trackers, advertising pixels, or systematic monitoring systems not included in the authorized technical configuration of the Portal, it shall in advance update the present notice and the Cookie Policy, clearly indicate the new purposes and the parties involved, collect the consent of the data subject where required, and, where appropriate, carry out a Data Protection Impact Assessment (DPIA) pursuant to Article 35 of the GDPR. The possible activation of tools such as Meta Pixel, Microsoft Clarity, Google Ads, or similar tools on the ASI infrastructure shall in any event be prohibited in the absence of prior written authorization of the Italian Space Agency, of the updating of the present notice and of the Cookie Policy, and of the collection of the user's consent where required by the applicable legislation. Such tools may not be activated by default.

Article 5. Data retention period

The personal data are retained by the Controller for differentiated periods according to the purpose of the processing and the nature of the data, in observance of the principle of storage limitation set out in Article 5(1)(e) of the GDPR:

5.1. Accounting and billing data: retained for a period of ten (10) years from the date of registration of the relevant operation, in accordance with the obligation to retain accounting records provided by Article 2220 of the Civil Code and by the applicable tax legislation (Presidential Decree No. 600/1973; Presidential Decree No. 633/1972).

5.2. Data relating to the order, shipping, and customer service: retained for the duration of the contractual relationship and, subsequently, for a period not exceeding twenty-four (24) months from delivery of the Product, in order to allow the management of any complaints, returns, and requests pertaining to the legal guarantee of conformity (the limitation period of which is twenty-six months from delivery, pursuant to Article 132, paragraph 4, of Legislative Decree No. 206/2005). Upon expiry of that period, the data exceeding those necessary for the fiscal obligations referred to in point 5.1 shall be deleted or anonymized.

5.3. User account data: retained for the entire duration of activation of the account and deleted within thirty (30) days of the data subject's request for deletion, save for the data the retention of which is imposed by legal obligations (paragraph 5.1).

5.4. Data for marketing purposes (newsletter): retained until the revocation of consent by the data subject. In the absence of express revocation, the data shall be retained for a maximum period of twenty-four (24) months from the last active contact, such as the opening of a communication, a click on a link, an interaction with content, or the making of a purchase. Any opening and click statistics detected through Klaviyo are retained for the same period, save for early deletion consequent upon the revocation of consent or upon the data subject's request,

where compatible with the applicable legislation. Upon expiry of that term without any interaction being recorded, the address shall be automatically removed from the distribution list.

5.5. Technical navigation data: processed in real time for the functioning of the platform and, where recorded in the system logs attributable to the Controller, retained for a maximum period of ninety (90) days, upon the expiry of which they are automatically deleted. The data processed by ASI through anonymized Google Analytics for aggregate statistical purposes are not retained by the Controller and are governed by ASI's framework privacy notice, including as regards the relevant retention period.

Article 6. Recipients and processors

6.1. The personal data may be communicated to the following categories of parties, operating as Processors pursuant to Article 28 of the GDPR or as autonomous recipients within the limits strictly necessary:

(a) Technical management, security, and aggregate analysis of the Portal: ASI, in its capacity as manager of the technical infrastructure of the Portal installed on its own servers located in Italy and as Autonomous Controller for the processing connected with the administration of the platform, security, institutional supervision, technical management of accounts, and aggregate statistical analyses by means of anonymized Google Analytics. The relationship between the Parties on the matter of data protection is governed by Article 15 of the License Agreement, it being understood that the Controller retains autonomy for the activities of sales, logistics, invoicing, after-sales, and marketing attributable to the Concessionaire.

(b) Newsletter service and commercial communications: Klaviyo, Inc., with offices in Boston, Massachusetts (USA). Klaviyo operates as Processor for the management of the sending of the Controller's marketing communications. The service operates in external autonomy with respect to ASI's databases and does not constitute processing carried out by ASI. The data processed through Klaviyo comprise the email address, any further data voluntarily provided by the data subject in the newsletter subscription form, and the statistical data relating to the opening of communications and clicks on links, where detected by means of tracking pixels or tracked links. Such data are retained on AWS servers located in Virginia (USA). As regards the guarantees relating to the extra-EU transfer, reference is made to Article 7 of the present notice.

(c) Couriers and shippers: third parties entrusted with the delivery of the Products, to whom only the data necessary for the performance of the shipment are communicated (name, surname, delivery address, telephone contact).

(d) Payment-service providers: the payment gateways used by the Portal, which process the transaction data in their capacity as Autonomous Controllers of the processing, in accordance with their own privacy notices and through PCI DSS protocols and standards. The complete payment-card data and the other sensitive payment data do not transit or remain stored on the servers of the ASI infrastructure and are not accessible to the Controller, which receives only the information necessary to confirm the outcome of the payment and to manage the order.

(e) Consultants and professionals: the Controller's accountants, tax advisers, and legal advisers, for the activities connected with fiscal and accounting compliance and with the protection of rights in judicial or out-of-court venues, within the limits of what is strictly necessary.

(f) Public authorities: judicial authorities, the Guardia di Finanza, the Italian Revenue Agency, and further competent authorities, in the cases provided by law.

6.2. An updated list of the Processors appointed by the Controller is available on request, forwarded to the PEC address indicated in Article 1.

Article 7. Transfer of data to third countries

7.1. In relation to the newsletter management service, the personal data (limited to the email address alone) may be transferred outside the European Economic Area, to the United States of America, through Klaviyo, Inc.

7.2. The transfer is assisted by the following guarantees, in accordance with Chapter V of Regulation (EU) 2016/679:

\(a\) Klaviyo adheres to the **EU-U.S. Data Privacy Framework** (DPF), adopted by Implementing Decision of the European Commission of 10 July 2023 (C(2023) 4745 final), which recognizes an adequate level of protection for transfers to organizations certified in the United States;

\(b\) the Data Processing Agreement entered into with Klaviyo (activated upon the acceptance of the provider's Terms of Service) incorporates the **Standard Contractual Clauses (SCC)** adopted by the European Commission by Implementing Decision (EU) 2021/914 of 4 June 2021, as a supplementary guarantee in the event of invalidation or modification of the adequacy framework.

7.3. Apart from the transfer to Klaviyo, relating solely to the Controller's newsletter service, the personal data processed by the Controller for purposes of sales, shipping, invoicing, customer assistance, and after-sales are retained, insofar as they fall within the Controller's competence, within the Portal infrastructure or with the parties indicated in the present notice. It remains established that ASI, as Autonomous Controller of the processing for the technical and statistical management of the Portal, may carry out transfers of aggregate and anonymized data to Google LLC in the United States within the scope of the Google Analytics service, in accordance with the guarantees indicated in its own framework privacy notice. Should new transfers of data to third countries be introduced by the Controller in the future, the Controller shall update the present notice and adopt the appropriate guarantees provided by Articles 46 et seq. of the GDPR.

Article 8. Rights of the data subject

8.1. In relation to the processing operations described in the present notice, the data subject may exercise the following rights, by addressing the Controller via PEC at the address letsdoprint@pec.it:

(a) Right of access (Article 15 GDPR): to obtain from the Controller confirmation as to whether or not processing of personal data concerning the data subject is taking place and, where that is the case, access to the data themselves and to the information referred to in Article 15(1).

(b) Right to rectification (Article 16 GDPR): to obtain the rectification of inaccurate personal data or the completion of incomplete data.

(c) Right to erasure (Article 17 GDPR): to obtain the erasure of the personal data, where the conditions provided by Article 17(1) of the GDPR are met, save for the case in which the processing is necessary for compliance with a legal obligation or for the establishment, exercise, or defence of a right in judicial venues.

(d) Right to restriction of processing (Article 18 GDPR): to obtain the restriction of processing where the conditions provided by the norm apply, as in the case in which the data subject contests the accuracy of the data for the period necessary for verification, or where the processing is unlawful but the data subject opposes erasure.

(e) Right to data portability (Article 20 GDPR): to receive, in a structured, commonly used, and machine-readable format, the personal data concerning the data subject, provided to the Controller on the basis of consent or contractual performance, and to transmit them to another controller of the processing.

(f) Right to object (Article 21 GDPR): to object at any time to the processing of personal data based on the legitimate interest of the Controller, for reasons connected with the data subject's particular situation. In the event of an objection, the Controller shall refrain from further processing the data unless it demonstrates the existence of compelling legitimate grounds that override the interests, rights, and freedoms of the data subject.

(g) Right to withdraw consent (Article 7(3) GDPR): where the processing is based on consent, the data subject has the right to withdraw the consent given at any time, without prejudice to the lawfulness of the processing carried out before the withdrawal. For marketing communications, the withdrawal may also be exercised through the unsubscribe link present in each communication.

8.2. The Controller undertakes to provide a response to the data subject's requests without unjustified delay and, in any event, within one month of receipt of the request, with the possibility of an extension of a further two months where the complexity or the number of the requests renders it necessary, giving reasoned communication thereof to the data subject within the first month, in accordance with Article 12(3) of the GDPR.

Article 9. Right to lodge a complaint with the supervisory authority

9.1. Without prejudice to any other administrative or judicial remedy, a data subject who considers that the processing of the personal data concerning the data subject is carried out in breach of Regulation (EU) 2016/679 has the right to lodge a complaint with the competent supervisory authority, pursuant to Article 77 of the GDPR.

9.2. The supervisory authority competent for the Italian territory is the **Italian Data Protection Authority (Garante per la Protezione dei Dati Personali)**, with offices at Piazza Venezia 11, 00187 Rome; website: https://www.garanteprivacy.it; PEC: protocollo@pec.gpdp.it.

Article 10. Cookies

10.1. For the information relating to the use of cookies and similar technologies within the Portal, reference is made to the Cookie Policy published in a dedicated section of the Portal itself, to which the present notice is to be understood as complementary. The Cookie Policy distinguishes between technical cookies necessary for the functioning of the platform, Google Analytics analytical cookies configured by ASI in anonymized and aggregate form, and profiling or behavioural tracking tools not active as at the date of the present notice. The Controller does not autonomously install tracking pixels, advertising tools, or other behavioural trackers on the ASI infrastructure. Any future activation shall require prior written authorization of the Italian Space Agency, the updating of the privacy and cookie documentation, and the collection of the user's consent where required by the applicable legislation.

Article 11. Security measures

11.1. The Controller adopts technical and organizational measures adequate to ensure a level of security proportionate to the risk, in accordance with Article 32 of Regulation (EU) 2016/679. Such measures comprise, by way of non-exhaustive example: the use of encryption protocols for the transmission of data (HTTPS/TLS), secure authentication procedures for access to the restricted area, the limitation of access to personal data to authorized and duly instructed personnel alone, as well as procedures for periodic backup and data recovery.

11.2. The technical infrastructure of the Portal, managed by ASI, is subject to the security measures provided by the legislation applicable to public administrations on the matter of information protection and operational continuity.

11.3. In relation to electronic payments, the complete data of credit cards, debit cards, or other payment instruments are handled exclusively by the payment-service providers through PCI DSS protocols and standards. No sensitive payment data transits or remains stored on the servers of the ASI infrastructure. The Controller processes exclusively the minimum information necessary to verify the outcome of the transaction, reconcile the order, and comply with the applicable fiscal and accounting obligations.

Article 12. Amendments to the present notice

12.1. The Controller reserves the right to amend or update the present notice at any time, in light of variations in the applicable legislation, of pronouncements of the Data Protection Authority, or of modifications to the methods of processing the data. The updated version shall be published on the Portal with indication of the date of last amendment. Users are advised to consult the present section periodically.

12.2. Where the amendments concern purposes or methods of processing for which the consent of the data subject is required, the Controller shall proceed to collect consent anew in accordance with the methods prescribed by the GDPR.