

## INFORMATION NOTICE ON THE PROCESSING OF PERSONAL DATA BY INTUOS

*(articles 13 and 14, EU Regulation 2016/679)*

In order to provide its products and services to customers, Intuos must collect and process some of their personal data, subsequently storing and archiving them, or must process personal data. Intuos therefore wishes to clearly inform customers (as also required by EU Regulation 2016/679, the so-called Privacy Regulation, hereinafter referred to as the “ **Regulation** ”) on the following aspects:

- i) Who is the data controller?
- ii) The types of data collected
- iii) The purposes of processing
- iv) Cases of possible transfer of data to third parties and the rules for transfer to foreign countries
- v) The retention period
- vi) Customers' rights
- vii) Contact details of the data controller

### 1. Data Controller

data controller is Intuos Srl, with registered office in Via Gianluigi Bonelli, 40, 00127 Rome, email : [privacy@intuos.it](mailto:privacy@intuos.it) (“ **Intuos** ”).

The Company acts as the data controller in relation to the provision of its software services (hereinafter, the “**Services**”), which are made available through its proprietary platforms **The Manager** © and **InFlight Data Monitoring**, the latter being enabled and operated through dedicated hardware (hereinafter, the “**Device**”).

### 2. Personal data collected and their types

When signing the contract, Intuos collects the data provided directly by the Customers.

While using the Device, Intuos collects data detected by it limited to the data necessary for the provision of the Services. Many of the Services provided do not require the processing of personal data collected by the Device and remain at the exclusive disposal of the customer.

The Device, in fact, has been designed to be used by the customer independently and to make its data available only on its own systems, without access by Intuos. Only if the customer has subscribed additional Services (such as the flight style advice service or flight envelope measurement) , the data collected by the Device are transmitted to Intuos and processed by them exclusively for the processing and provision of such additional Services (the “ **Additional Services** ”).

personal data , however their processing is essential for the provision of the Services themselves. Therefore, failure to communicate personal data could determine the impossibility for Intuos to perform all or some Services.

The personal data processed may fall into one of the following categories:

- a) **identification data** (such as name and surname, tax code);
- b) **contact details** (such as contact details, email address);
- c) **shipping data** (address for shipping the device);
- d) **data relating to the type of aircraft**;

## Privacy Policy

Intuos does not collect data belonging to the special categories of data referred to in art. 9(1) of the Regulation (data relating to health, genetic data, biometric data, etc.).

### 3. Purpose of processing and legal basis

The personal data collected are processed to pursue the following purposes.

- a) **Management of the contractual relationship:** to carry out the administrative and accounting activities necessary for the execution of the contract or pre-contractual measures and to execute the contract by providing the Services requested by the customer. It is specified that the communication protocols between the Device and the application made available to the customer to make the data visible to the customer himself, may require the automated processing of the data collected by the Device for the time strictly necessary for the encoding of the data; furthermore, for some Additional Services expressly requested by the customer (such as the flight style advice service) it will be necessary to profile some data collected by the Device.  
The legal basis that legitimizes the processing of personal data for this purpose is constituted by art. 6(1)(b) of the Regulation. (“... *the processing necessary for the performance of the contract to which the interested party is party*”) and from art. 22(2)(a) as the processing of customer data is necessary to execute the contract, to provide the Services to the customer in compliance with the terms and conditions relating to the Service;
- b) **Comply with Legal Obligations:** to comply with legal obligations to which Intuos is subject. The legal basis that legitimizes the processing of personal data for this purpose is art. 6(1)(c) of the Regulation (“... *processing is necessary for compliance with a legal obligation to which the Data Controller is subject*”).
- c) **To provide company-related communications, via email,** including newsletters, regarding Intuos activities. The legal basis that legitimizes the processing of personal data for this purpose is art. 130, paragraph 4, of Legislative Decree 196/2003 which provides that the owner can use the email address to send communication relating to services similar to those purchased by the customer, unless the customer objects to such processing activity.
- d) **Make communications relating to the company's activities also through other means of communication:** for the communication of Intuos services and products to customers via email, or also for the sending of advertising material and commercial communications using automated methods, such as SMS, MMS, telephone calls without an operator, messages via web applications, or other, and not, such as paper mail or telephone calls via an operator.

### 4. Cases of possible sharing of collected personal data with third parties

Intuos may share the data collected with its suppliers of services necessary to achieve the purposes referred to in point 3 (e.g. electronic communication systems, data processors, app developers). Each of these external parties is duly appointed by Intuos as data controller and is contractually obliged, in turn, to comply with the legislation on the protection of personal data also for the data collected and transmitted by Intuos and to comply with the instructions given by the latter.

Intuos may also be required to communicate the personal data collected to subjects, entities or legal authorities in the event of a legal obligation or an order from the authorities.

## 5. Transfer of personal data collected to third countries

Intuos does not transfer the personal data collected outside the European Economic Area, except to countries for which the European Commission has issued an “adequacy” decision on the protection of personal data, or in the presence of the guarantees provided for by Articles 45 et seq. of the Regulation.

## 6. Retention period

The retention period of the personal data collected varies depending on the purpose of the processing.

In the case of **Management of the contractual relationship**, the data is stored until the date of termination of the contractual relationship with the **customer**.

In the case of **fulfillment of legal obligations**, they are retained for the time required by the specific obligation or applicable law.

In the case of **corporate communications via email**, they are retained until the **customer** requests that this processing cease.

In the case of **corporate communications with other means of communication**, they are retained for a period of 24 months from the termination of the contractual relationship.

Furthermore, Intuos retains the personal data collected strictly necessary to **protect its rights and interests** for the period provided for by Italian law for this purpose (articles 2946 of the Civil Code and subsequent).

## 7. Customer rights

The **customer** has the right to request from Intuos, in the cases provided for by the Regulation:

- i) access to your data;
- ii) the rectification or deletion of data;
- iii) the transformation into anonymous form or the suspension or limitation of the processing of data concerning him;
- iv) to receive your data in a structured, commonly used and machine-readable format;
- v) to object to the processing of your data for sending company communications .

At any time, if the **customer** believes that the processing of his/her data is contrary to the law, he/she has the right to lodge a complaint with the Authority for the protection of personal data.

## 8. Reference contacts

The **customer** can contact Intuos at any time to exercise the rights indicated above and for any questions relating to the processing of their data, at the email address : [privacy@Intuos.it](mailto:privacy@Intuos.it) .

27/10/2025