

Privacy Policy

Last update: 01 dicembre 2025

This information, relating to this website, reachable at the URL www.o2up.it (the “Site”), has been prepared pursuant to art. 13 of Regulation (EU) 2016/679 (“GDPR”) and Italian Legislative Decree 196/2003.

1. Data controller

O2UP™ Srl (“O2UP™”), with registered office in via Walpot 28, 42123 Reggio Emilia (RE), Italy, VAT number 02824590356 - as data controller.

You can always contact O2UP™ at the following addresses:

- to the email address: info@o2up.it
- at via Walpot, 28 - 42123 Reggio Emilia (RE)

2. Purposes and legal bases of the processing

The processing is aimed at:

- Allow the correct use of the Site. The legal basis is identified, pursuant to art. 6, par. 1, letter b) of the GDPR, in the need to execute a contract to which you are a party.
- Manage communications and requests made via email, telephone and the contact form on the Site. The legal basis is identified, pursuant to art. 6, par. 1, letter b) of the GDPR, in the need to execute a contract to which you are a party or a pre-contractual measure at your request.
- Manage appointment requests made via specific forms on the Site. The legal basis is identified, pursuant to art. 6, par. 1, letter b) of the GDPR, in the need to execute a contract to which you are a party or a pre-contractual measure at your request.
- Perform statistical analyses on navigation and use of the Site. The legal basis is identified, pursuant to art. 6, par. 1, letter a) of the GDPR, in your explicit consent, through a specific option on the “cookie banner”.
- Improve the quality of the user's browsing experience, allowing interaction with contents, networks and other external platforms. The

legal basis is identified, pursuant to art. 6, par. 1, letter a) of the GDPR, in your explicit consent, through a specific option on the "cookie banner".

- f) Comply with all obligations of the data controller under current legislation. The legal basis is identified, pursuant to art. 6, par. 1, letter c) of the GDPR, in the need to fulfill a legal obligation to which the data controller is subject.
- g) Defend a right in court or before authorities exercising jurisdictional functions. The legal basis is identified, pursuant to art. 6, par. 1, letter f) of the GDPR, in the need to pursue a legitimate interest of the data controller.

The provision of personal data, although not a legal obligation, is necessary, in relation to certain personal data relating to technical cookies, for the purposes of the functioning of the Site, according to purpose a); therefore, any refusal or failure to provide such data could make it impossible to use this website correctly.

Similarly, in relation to purposes b) and c), personal data, although not mandatory, are necessary for the purposes of a correct response to the communication or appointment request; therefore, any refusal or failure to provide them could make it impossible to provide an appropriate response to the communication or appointment request.

In relation to purposes d) and e), however, the provision of data is optional and, in the absence of such data, it will still be possible to use the Site normally.

In any case, by providing your personal data for any of the aforementioned purposes to the data controller, the latter may process such data to fulfill legal obligations and to pursue its legitimate interest in protecting its own rights in court or before judicial authorities, pursuant to purposes f) and g).

3. Methods of processing

The data will be processed with electronic, digital, computer, telematic and also analog tools, in full compliance with the law, according to principles of lawfulness and correctness and in a way that protects confidentiality.

In any case, personal data will not be subject to an automated decision-making process, nor will they be transferred to a country outside

the European Economic Area (EEA, i.e. EU, in addition to Norway, Liechtenstein, Iceland), except in the case in which consent has been given to the site's analytical cookies.

Google Analytics 4 is, in fact, a web analysis service provided by the third party Google Ireland Ltd., with headquarters in Dublin, Ireland, and servers also located in the United States, at the holding company Google LLC. In this case, the transfer of personal data, although not directly identifying, is still permitted, pursuant to art. 45 of the GDPR, by virtue of the adequacy decision of the European Commission for the EU-USA Data Privacy Framework, as well as, pursuant to art. 46 of the GDPR, by virtue of the signing of specific standard contractual clauses approved by the European Commission.

4. Categories and sources of data processed

a) Data derived from user navigation.

These data, through the normal functioning of the site, are acquired and transmitted implicitly in the use of Internet communication protocols. This information is not collected to be associated with identified interested parties, but, by its very nature, through processing with data held by third parties, could allow users to be identified.

This category of data includes the IP addresses or domain names of the computers used by Users who connect to this site, the URI (Uniform Resource Identifier) addresses of the requested resources, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the operating system and the user's computer environment.

Such data processing and association activities are never carried out by the data controller, they are used for the sole purpose of checking the correct functioning and are automatically deleted after processing.

b) Cookies

Information on the use of cookies within the site is reported in the specific Cookie Policy of the Site.

c) Data provided by the user.

The information and data entered voluntarily by the user in the appropriate fields provided in the contact and appointment request forms on the Site: name and surname, e-mail address, telephone number, company, job role, any other information freely communicated by the user.

5. Recipients of personal data

Personal data may be communicated to, or become known to, for the above-mentioned purposes and to provide, improve, protect and promote their services:

- subjects authorised to process data;
- data controllers and related additional controllers and authorised parties, such as, by way of example and not limited to: service providers, suppliers of IT services or assistance to the same, and related technical personnel in charge, any collaborators, those in charge of occasional maintenance operations, all adequately trained in the protection of confidentiality;
- judicial or administrative authorities, for the fulfillment of legal obligations;
- entities that process data in compliance with specific legal obligations.

6. Period of retention of personal data

Personal data will be processed and stored for the entire period necessary to fulfill the above-mentioned purposes and, in particular:

- the data collected to allow correct and functional navigation on the Site, to perform statistical analyses on navigation and to improve the user experience on the Site, are stored for the duration indicated in the Cookie Policy;
- the data collected to manage requests made by email, telephone, and/or via the forms on the Site are retained until the request is fulfilled or an appointment is made or, possibly, for a longer period, if connected to

other purposes that require longer-term storage (e.g.: provision of a service following an appointment being made);

- the data collected for the fulfillment of legal obligations are retained for the necessary time provided for by the provisions of law or regulation;
- the data collected for the defense of rights in court are retained until the limitation period of the right to be asserted or, where legal proceedings are initiated, until the definitive conclusion of the same.

7. Rights of the data subject

Pursuant to articles 7, 15-18 and 20-21 of the GDPR, the data subject has the right:

- to withdraw consent at any time, without prejudice to the lawfulness of the processing based on consent before its withdrawal;
- to obtain information in relation to the purposes for which your personal data are processed, the period of processing and the subjects to whom the data are communicated (right of access);
- to obtain the rectification or integration of inaccurate personal data concerning him (right to rectification);
- to obtain the deletion of personal data concerning him/her in the following cases (a) the data are no longer necessary for the purposes for which they were collected; (b) he/she has withdrawn his/her consent to the processing of data processed on the basis of his/her consent; (c) he/she has opposed the processing of personal data concerning him/her in the event that they are processed for our legitimate interest; or (d) the processing of his/her personal data is not compliant with the law.

However, we point out that the retention of personal data by the owner is lawful if it is necessary to allow compliance with a legal obligation or to ascertain, exercise or defend a right in court (right to erasure);

- to obtain that the personal data concerning him or her are only stored without any other use of them in the following cases: (a) the accuracy of the personal data is contested by the data subject, for the period necessary to allow us to verify the accuracy of such personal data; (b) the processing is unlawful but the data subject opposes the erasure of the personal data; (c) the personal data are necessary for the data subject to ascertain, exercise or defend a right in court; (d) the data subject has objected to the processing and we are awaiting verification as to

whether our legitimate grounds for processing prevail over those of the data subject (right to restriction of processing), (e) if there is a public interest;

- to obtain the cessation of processing in cases where personal data are processed for our legitimate interest and the existence of this interest is contested (right to object);
- to receive in a commonly used, machine-readable and interoperable format the personal data concerning you processed by automated means, if they are processed pursuant to a contract or on the basis of consent (right to data portability).

Potrà esercitare i diritti contattando direttamente il titolare ai recapiti sopra dettagliati.

You may exercise your rights by contacting the data controller at the contact details above indicated.

Finally, if the data subject wishes to submit a complaint regarding the ways in which his/her data is processed, or regarding the management of a proposed complaint, he/she has the right to submit a request directly to the Supervisory Authority (Italian Data Protection Authority: www.gpdp.it) or to take appropriate legal action (art. 79 of the GDPR).