CLOUD EUROPE S.R.L.
CUSTOMER PRIVACY NOTICE

pursuant to art. 13 of Regulation (EU) 2016/679 ("**GDPR**")

With this notice, the Controller wishes to illustrate to you the details relating to the processing activities of your personal data processed in order to conclude or follow up on the contract established with you.

Controller:
Cloud Europe S.r.l., with registered office at Via Giacomo Peroni 292, 00131 - Roma, in the person of its legal representative is the controller of your personal data (the "**Controller**" or "**Cloud Europe**"). The Controller can be contacted at the following email address: info@cloudeurope.it. The Data Protection Officer (DPO), appointed by the Data Controller pursuant to Article 37 of the GDPR, can be contacted at the following email address: dpo.mediterra@sgsolution.eu.

Purpose and legal basis of processing:
Your personal data will be processed by the Controller in a lawful manner and in accordance with the principle of fairness. By personal data is meant any information suitable to identify, directly or indirectly, a natural person ("**Personal Data**"). In this case, the Personal Data are processed in the context of executing the contract concluded with you and the related administrative obligations connected to it.

Specifically, within the scope of contract execution, Cloud Europe processes the Personal Data listed below:

- first name and last name;
- professional title;
- name and address of the organization for which Customer work;
- business contact information (e-mail address, phone number);
- bank details of the organization for which the Customer work;
- details of services purchased or to be purchased;
- contracts relating to the services purchased or to be purchased;
- biometric data;
- vehicle license plate;
- images captured by CCTV during visits;
- any data potentially provided to the Controller.

The Controller is committed to ensuring that the information collected and used is appropriate for the purposes described and that this does not result in an invasion of your personal sphere.

That said, your Personal Data is processed to achieve the following purposes:

1. providing services and products to Customer;
2. adapting the Controller's services to the Customer's needs;
3. to send communications by email regarding products and/or services already purchased or used by the Customer;
4. sending an invoice and manage the payment process;
5. complying with the Controller's administrative obligations;
6. ensuring the security of datacenters.

Personal Data is processed based on the following legal conditions:

- necessity to execute a contract to which you are a party under art. 6, par. 1, lett. b), GDPR;
- necessity to fulfill legal obligations under article 6, par.1, lett. c), GDPR;
- legitimate interest of the Controller under art. 6, par. 1, lett. f), GDPR.

Processing methods:
Personal Data are processed with the necessary security and confidentiality to ensure compliance with current regulations. The processing methods include: data collection at the company, collection and recording of such data for specific, explicit purposes, and the use of data in further processing operations only if compatible with the purposes for which such data were collected. Additionally, processing may occur with the aid of electronic tools.
Regarding the processing of biometric data necessary for authentication and access security to Cloud Europe's datacenters, the Controller ensures the use of pseudonymization and encryption techniques to adequately protect the information related to you.

Mandatory or optional nature of data provision and consequences of a possible refusal to respond:
The provision of your Personal Data is a necessary requirement for the conclusion and execution of the contract. Any failure to provide the requested Personal Data will make it impossible for the Controller to proceed with pre-contractual and contractual requests.

Communication of data to third parties:
For the purposes listed above, the Controller may communicate your Personal Data to the following categories of recipients, who will process your Personal Data as processors or autonomous controllers:

(i) group entities: the Controller, when necessary for the provision of requested services, may share your Personal Data with affiliated companies and subsidiaries of the Mediterra group;
(ii) suppliers and subcontractors: your Personal Data may be transferred to Cloud Europe's suppliers and subcontractors only to the extent that such information is necessary for the provision of the requested services;
(iii) In exceptional situations, Cloud Europe may be obligated to disclose Your Personal Data to competent government authorities or other authorized entities, in compliance with legal obligations, or when necessary to protect the vital interests of Cloud Europe's employees, customers, or the public.

Your Data is not transferred to countries outside the European Economic Area. Should such transfers occur, the Controller will implement the safeguards required by the GDPR, including adequacy decisions and the Standard Contractual Clauses approved by the European Commission.

Retention periods:

Your Personal Data is retained by the Controller for the time necessary to achieve the purposes indicated in the paragraph "Purpose and legal basis of processing" in accordance with the applicable legal provisions and, in particular:

(i) access data to datacenters is retained for 6 months;
(ii) images captured by the video surveillance system are retained for 1 month;
(iii) biometric data is retained until the conclusion of the contract.

Afterwards, the data will be deleted or anonymized.

Rights as a data subject:

During the period in which the Controller holds or processes Personal Data, you, as the data subject, may at any time exercise the following rights:

- right of access to data;
- right to rectification of data;
- right to erasure of data;
- right to restriction of processing;
- right to object to processing;
- right to data portability;

- right to withdraw consent at any time;
- right not to be subject to automated decision-making that has legal effects concerning your person.

Furthermore, you have the right to lodge a complaint with the supervisory authority (Garante for the protection of personal data, Piazza Venezia 11, 00187 - Rome, Italy, Telephone +39 06696771, E-mail: protocollo@gpdp.it, www.garanteprivacy.it).

You can exercise your rights by contacting the Controller or the DPO at the contact details above.

Upd. 22 May 2026