

PERSONAL DATA PROCESSING NOTICE

pursuant to Article 13 of Regulation 2016/679 (the “Regulation”)

Lifetronic S.r.l. wishes to inform every visitor and user (hereinafter the “Data Subject”) that, pursuant to EU Regulation 2016/679 (hereinafter the “Regulation” or “GDPR”), their personal data during the browsing and use of the website www.lifetronic.it will be processed by Lifetronic S.r.l. as Data Controller.

Among the features offered, the site provides a virtual assistant (a chatbot with an optional video avatar) based on artificial intelligence systems, the use of which entails specific processing of personal data as described in this notice.

DATA CONTROLLER

The Data Controller for the personal data collected through this website/service is Lifetronic S.r.l., with registered office at Via Cesare Battisti 14/N - 56121 Pisa (PI), Italy, Tax/VAT No. IT01886150505. For any questions or requests relating to the processing of your personal data, you may contact the Controller by e-mail at privacy@lifetronic.it, or by certified e-mail (PEC) at info@pec.lifetronic.it.

TYPES OF PERSONAL DATA PROCESSED

In the course of activities carried out by the Data Subject on the website, Lifetronic collects the following categories of personal data.

- **Browsing data:** during normal browsing of the site, certain information is automatically collected, the transmission of which is implicit in the use of Internet communication protocols: the device's IP address, the URI addresses of requested resources, the time of the request, the method used to submit the request to the *server*, the size of the file received in response, the numeric code indicating the status of the *server* response, the type and language of the *browser*, operating system and other parameters related to the user's computing environment. Such information is not collected for the purpose of being associated with identified data subjects, but by their very nature could, through processing and association with data held by third parties, allow users to be identified;
- **Data voluntarily provided by the user:** through the contact form on the site, users may send messages and requests for information to the Controller. In this case, the data entered by the user in the form are collected: first name, last name, e-mail address and the content of the communication. Providing such data is optional, but necessary in order to receive a response; Submission of the form is protected by an anti-bot system (Cloudflare Turnstile) intended to prevent automated submissions and abuse;
- **Newsletter subscription data:** users who subscribe to the Lifetronic newsletter provide their name and e-mail address, as well as the date of subscription and communication preferences.
- **Cookies and tracking technologies:** the site uses technical *cookies* necessary for its operation and, subject to the user's consent, statistical analysis *cookies*. For detailed information on the types of cookies used, their persistence period and management methods, please refer to the Cookie Policy published on the site. Certain features, in particular the virtual assistant, also use browser local-storage technologies (local/session storage) to maintain the session state.
- **Data processed through the virtual assistant:** where the user interacts with the site's virtual assistant, the contents of the conversation (typed text) are processed and, if the user activates the video avatar, the audio of the user's voice, which is processed in real time to generate responses and is generally not retained beyond such processing; the related text transcripts are kept only for the duration of the session. If, during the conversation, the user provides contact details (e.g. name and e-mail to be contacted back), such data are processed as a contact request. Technical session identifiers needed to keep the conversation active are also processed;
- **Technical data for security and abuse prevention:** to protect the contact form and the start of virtual-assistant sessions from automated access and abuse, the site uses an anti-bot system (Cloudflare Turnstile) that processes the IP address and technical signals relating to the user's device and browsing behaviour.

PROCESSING METHODS AND ACCESS TO DATA

Processing is carried out through manual and/or automated means, using IT and telecommunications tools, with the prior adoption of appropriate technical and organisational security measures designed to ensure the security, integrity and confidentiality of personal data, in accordance with Articles 6 and 32 of the GDPR, minimising the risks of destruction, loss, unauthorised access, modification and unauthorised disclosure.

Data are accessible exclusively to Lifetronic's employees and collaborators who are adequately trained and authorised to process them, and who act on the basis of specific instructions given by the Controller.

The site's virtual assistant provides informational and conversational support with the aid of artificial intelligence systems. Such systems do not make automated decisions producing legal effects or similarly significant effects on the Data Subject within the meaning of Article 22 of the GDPR: the responses provided are purely informational and supportive in nature and remain subject to the Controller's supervision.

LOCATION OF DATA PROCESSING

Lifetronic s.r.l., Via Cesare Battisti 14/N - 56125 Pisa (PI)

Tel: 050.877.757 - www.lifetronic.it - info@lifetronic.it



Personal data are processed at the Controller's registered office and on the servers hosting the website or web platforms. Personal data are stored on servers located within the EU. The Controller guarantees that, in the event that *cloud* providers established outside the European Economic Area are used, the processing of personal data by such recipients is carried out in compliance with the principles of the GDPR. Transfers are made subject to appropriate safeguards, such as adequacy decisions, standard contractual clauses approved by the European Commission, or other safeguards provided for under the GDPR.

In particular, the hosting infrastructure of the website and of the virtual assistant is located on servers within the European Union (IONOS). Some technology service providers used by the site are instead based in the United States — in particular Cloudflare, Inc. (anti-bot security), Google LLC (statistics and maps), OpenAI OpCo, LLC (artificial intelligence models of the virtual assistant), HeyGen Technology Inc. (video avatar) and Meta Platforms, Inc. (messaging service): the related transfers of data to the United States are carried out on the basis of the EU-U.S. Data Privacy Framework and/or Standard Contractual Clauses approved by the European Commission, supplemented where necessary by additional measures.

PURPOSES OF DATA PROCESSING

The Controller processes Data Subjects' personal data for the following purposes:

- a. **Management of browsing and technical cookies:** the processing of browsing data and the use of *cookies* strictly necessary for the operation of the site are based on the legitimate interest of the Controller in ensuring the correct functioning of the website and IT security (Art. 6(1)(f) GDPR);
- b. **Management of contact requests:** data provided through the contact form are processed in order to respond to the user's requests and manage the resulting communications. The legal basis is the legitimate interest of the Controller in responding to communications received (Art. 6(1)(f) GDPR), as well as the execution of pre-contractual measures taken at the request of the data subject (Art. 6(1)(b) GDPR);
- c. **Newsletter delivery:** subject to the user's explicit consent, the Controller sends informational and promotional communications about its products and services by e-mail. The legal basis is the consent of the data subject (Art. 6(1)(a) GDPR). Consent may be freely withdrawn at any time by clicking on the unsubscribe *link* included in every communication, or by contacting the Controller at the addresses indicated in this notice;
- d. **Statistical analysis of web traffic:** subject to the user's consent, the Controller uses *Google Analytics* to analyse browsing and usage patterns, with a view to improving the site's content and functionality. Data are processed in aggregate form with anonymised IP addresses. The legal basis is the consent of the data subject (Art. 6(1)(a) GDPR). For aggregate and anonymous data, the Controller acts on the basis of its legitimate interest (Art. 6(1)(f) GDPR);
- e. **Compliance with legal obligations:** the Controller processes personal data where necessary to fulfil legal obligations to which it is subject, including tax, accounting and regulatory obligations (Art. 6(1)(c) GDPR);
- f. **Judicial protection of the Controller's interests:** personal data may be retained and used, within the limits permitted by law, for the protection of the Controller's rights in judicial or extra-judicial proceedings (Art. 6(1)(f) GDPR);
- g. **Operation of the virtual assistant:** data entered or communicated through the virtual assistant (chatbot and video avatar) are processed to provide conversational assistance, respond to the user's requests and handle any contact requests. The legal basis is the Controller's legitimate interest in providing an assistance service and responding to requests (Art. 6(1)(f) GDPR), as well as, where applicable, the performance of pre-contractual measures taken at the Data Subject's request (Art. 6(1)(b) GDPR). Activation of the video avatar, being a non-strictly-necessary feature, takes place subject to the user's consent (Art. 6(1)(a) GDPR);
- h. **IT security and abuse prevention:** the technical data processed by the anti-bot system (Cloudflare Turnstile) are used to prevent automated access, spam and abuse of the contact form and of the virtual assistant. The legal basis is the Controller's legitimate interest in the security of its systems (Art. 6(1)(f) GDPR);
- i. **Display of the interactive map:** the contact page features an interactive map (Google Maps) that allows the Controller's premises to be located. Loading of the map, which involves a connection to Google's servers, takes place subject to the user's consent (Art. 6(1)(a) GDPR);

SCOPE OF COMMUNICATION AND POSSIBLE DISCLOSURE

Personal data collected through the website may be communicated or made accessible to the following categories of recipients, for the purposes set out in this notice: (i) Lifetronic's employees and collaborators authorised to process the data, within the scope of their respective duties and on the basis of specific instructions; (ii) technology service providers acting as processors (or sub-processors) appointed by the Controller, including: IONOS (hosting of the website, of the application and of the virtual assistant, EU); Jumpgroup S.r.l. – Avacy Solution (cookie consent management platform, EU); Cloudflare, Inc. (Turnstile anti-bot service, USA); Google Ireland Limited / Google LLC (Google Analytics statistics and Google Maps, IE/USA); OpenAI Ireland Limited / OpenAI OpCo, LLC (artificial intelligence models processing the text and voice conversations of the virtual assistant on the server side, IE/USA); HeyGen Technology Inc. (generation of the streaming video avatar through the LiveAvatar service and the related real-time data transport infrastructure, USA); Meta Platforms Ireland Limited (messaging service for communications with users, IE/USA); the e-mail service provider used to forward requests received through the contact form and the virtual assistant; as well as the newsletter delivery service provider; (iii) external consultants and professionals providing legal, tax and accounting assistance, to the extent strictly necessary; (iv) public authorities and judicial bodies, in cases where communication is mandatory by law.

Personal data are not sold or transferred to third parties for their own commercial purposes. The updated list of data processors is available on request by writing to privacy@lifetronic.it.



RETENTION AND DELETION OF PERSONAL DATA

The Controller retains Data Subjects' personal data for the time strictly necessary to achieve the purposes for which they were collected, or for the period provided for by applicable law.

Browsing data and technical *cookies* are retained for the duration of the session or in any case for no longer than 12 months. Statistical analysis *cookies* persist for up to 26 months from collection, or until consent is withdrawn. Data provided through the contact form are retained for 2 years from the last contact, after which they are deleted or rendered anonymous. *Newsletter* data are retained until the Data Subject withdraws consent, and in any case for no more than 2 years from subscription in the absence of any interaction.

Data processed in connection with the virtual assistant are retained for the duration of the conversation session and, as a rule, for a maximum period of approximately 30 minutes of inactivity, after which the session is made no longer accessible; any voice audio processed through the avatar is handled in real time and is not retained. Any contact details provided through the virtual assistant or the contact form follow the retention periods established for contact requests. Technical data of the anti-bot system are retained for the time strictly necessary for security purposes.

Data necessary to fulfil tax and accounting obligations are retained for 10 years pursuant to Article 2220 of the Italian Civil Code. Data that may be used for the judicial protection of the Controller's rights are retained for the period set out in Articles 2946 and 2947 of the Italian Civil Code. Upon expiry of the retention periods, data are deleted or rendered permanently anonymous.

EXERCISE OF DATA SUBJECTS' RIGHTS

Data Subjects may exercise, at any time and without unjustified restrictions, all the rights recognised under Articles 15-22 of the GDPR, by contacting the Controller at privacy@lifetronic.it or by certified e-mail (PEC) at info@pec.lifetronic.it.

In particular, the Data Subject has the right to:

- obtain confirmation of the existence of processing of personal data concerning them and access to its content (Art. 15);
- obtain the rectification of inaccurate data or the integration of incomplete data (Art. 16);
- obtain the erasure of their data, in the cases provided for by law (Art. 17);
- obtain the restriction of processing, where the conditions apply (Art. 18);
- receive their data in a structured, commonly used and machine-readable format, and to transmit them to another controller without hindrance (Art. 20 - portability);
- object at any time to processing, in particular for direct marketing purposes (Art. 21);
- not be subject to decisions based solely on automated processing, including profiling (Art. 22);
- withdraw consent given at any time, without prejudice to the lawfulness of processing carried out prior to withdrawal.

The Data Subject also has the right to lodge a complaint with the Italian Data Protection Authority (Garante per la Protezione dei Dati Personali), pursuant to Article 77 of the Regulation, if they consider that the processing of their personal data is contrary to applicable law.

AMENDMENTS TO THIS NOTICE

The Controller reserves the right to modify and update this notice as a result of new legal provisions on the protection of personal data, changes to the services offered, or modifications to the processing methods adopted. Significant changes will be communicated to registered users via a notice on the website or by e-mail, with adequate advance notice prior to their entry into force. Data Subjects are invited to consult this notice periodically.

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