

PRIVACY AND COOKIE POLICY

This Privacy and Cookie Policy ("Policy") applies to the processing of your personal data by ItAlAI Srl ("ItAlAI", "we" or "us") through "italailabs.com" ("Website") in accordance with Regulation (EU) 2016/679 – General Data Protection Regulation ("GDPR"), the Italian Legislative Decree 196/2003 (as amended), Directive 2002/58/EC – e Privacy Directive (as amended), and other applicable local laws ("Data Protection Laws").

1. Data Controller and Data Protection Officer

The Data Controller is ItAlAI srl, based in Roma, Corso Vittorio Emanuele II n. 287, zip code 00197 (Italy), VAT 17384921007. For any requests regarding the processing of your personal data, please email us at research@italailabs.com. Our Data Protection Officer can be contacted for any requests relating to the processing of your personal data or this Policy by sending an email to luca.franco@italailabs.com.

2. Categories of Personal Data We Collect, Purposes, and Legal Grounds for Processing

We collect the following categories of personal data for the specified purposes and legal bases mentioned below. Please be aware that not all of the data described may be regarded as personal data in all jurisdictions.

a. To Enable Use of Our Website

The processing of personal data is required to fulfill a contract to which you are a party (Article 6(1)(b) of the GDPR).

We gather data such as device identifiers, technical details of your device, browser specifications, IP addresses, and any other information you provide through our website that is essential for its proper functioning.

b. To Comply with Legal Obligations and Requirements from Authorities

This is done in order to meet legal obligations that we are subject to (Article 6(1)(c) of the GDPR). We process data as needed to fulfill these legal duties.

c. To Assert, Exercise, or Protect Our Rights and Those of Our Employees, and for Business Transactions

The legal basis for processing is our legitimate interest (Article 6(1)(f) of the GDPR).

We handle necessary data for purposes like protecting our rights, including during events such as bankruptcy, mergers, acquisitions, reorganizations, asset sales, or transfers.

d. To Handle Customer Support Inquiries and Requests for Information

The legal basis for this processing is the fulfillment of our contractual obligations (Article 6(1)(b) of the GDPR).

We process identification and contact information (e.g., name, email address) as well as the content of your inquiries or requests.

e. To Create User Profiles by Analyzing Preferences, Behavior, Interests, and Choices on the Website, and to Measure the Effectiveness of Campaigns and Deliver Relevant Advertising

The legal basis for this processing is your consent (Article 6(1)(a) of the GDPR and/or, where applicable, Article 5(3) of the ePrivacy Directive).

We collect identifiers and activity data on the internet and network (e.g., IP addresses).

For further details on the processing of your personal data via cookies and similar technologies, please refer to Section 8 (Cookies) below.

3. Data Retention

We store and process personal data using both automated and manual means, and the data is stored either on our premises or on the servers of our service providers. We implement both technical and organizational safeguards to prevent the loss, misuse, and alteration of your personal data. In certain cases, we may apply encryption and pseudonymization techniques. However, keep in mind that data transmitted over the internet can never be 100% secure, and you should refrain from providing personal data if you are concerned about any risks involved.

Personal data related to Sections 2.a) and 2.d) will be kept for no longer than necessary for those purposes, and in any case, no more than three years after your last interaction with our website. Data related to Section 2.b) will be retained for up to five years after your last interaction with the website. Personal data related to Section 2.c) will be retained for up to ten years. Data from Section 2.e) will be kept until you withdraw your consent. Please refer to Section 8 (Cookies) below for more details on how long we retain data through cookies and other similar technologies.

4. Your Choices

Providing browsing data is required to navigate and interact with our website. The same applies to any information you provide when you contact us for inquiries or customer support. You have the option to accept or decline cookies and other tracking technologies that are not strictly necessary for the functionality of the website, as described in Section 8 (Cookies) below.

5. Sharing Your Personal Data

We may disclose your personal data to the following categories of recipients:

- External entities that perform services related to or essential for our business operations, such as IT service providers, cloud storage providers, mobile measurement partners, mobile marketing service providers, and advertising networks (as external data processors or independent data controllers).
- Public authorities, law enforcement, or regulatory bodies, as required by law.
- In the event of corporate transactions (e.g., bankruptcy, mergers, acquisitions, reorganizations, or asset sales), our advisors and potential buyers, where your personal data may be transferred as part of the transaction.

We will not disclose personal data for any other purposes unless it is required to comply with a legal obligation or if we have obtained your consent.

6. Transfer of Personal Data Outside the European Economic Area (EEA)

We may transfer your personal data to countries outside the European Economic Area (“EEA”) (e.g., when data is collected through third-party cookies or similar technologies operated outside the EEA).

Such transfers are carried out in compliance with data protection laws and based on appropriate safeguards, including (a) standard contractual clauses approved by the European Commission, (b) adequacy decisions made by the European Commission, or (c) Binding Corporate Rules.

For more information regarding these data transfers and the safeguards in place, please contact us at research@italailabs.com.

7. Your Rights

You have the right to exercise the following rights at any time, free of charge, subject to certain limitations and exceptions under applicable data protection laws:

- **Right of Access:** You can request information about how your personal data is being processed and access it.
- **Right to Rectification:** You can ask for your personal data to be updated, corrected, or completed.
- **Right to Erasure:** You can request the deletion of your personal data.
- **Right to Restrict Processing:** You can request restrictions on how your data is processed.
- **Right to Data Portability:** You can request a portable electronic copy of your personal data.
- **Right to Object:** If we process your data based on legitimate interests, you can object to this processing, either in full or in part, particularly for direct marketing purposes, including profiling.
- **Right to Withdraw Consent:** If we process your data based on consent, you can withdraw it at any time, although this will not affect the lawfulness of processing before the withdrawal.

You also have the right to lodge a complaint with the relevant Data Protection Authority, particularly in the Member State where you reside, work, or where the alleged violation occurred.

To exercise your rights or if you have questions about privacy or data protection at ItAI you can contact us at research@italailabs.com. We may take steps to verify your identity before responding to your request.

8. Cookies

What Are Cookies and Tracking Technologies?

When we mention "cookies" in this policy, we refer to any tracking technologies that store or access information on your device, including SDKs, tracking pixels, HTML5 local storage, local shared objects, and fingerprinting methods.

Cookies can generally be categorized based on:

- **Purpose** (technical cookies, analytical cookies, profiling cookies)
- **Publisher** (first-party cookies, third-party cookies)
- **Duration** (session cookies, persistent cookies)

These classifications are important as they determine which legal requirements apply. Below is an overview of the cookies and tracking technologies we use.

A. By Purpose

- **Technical Cookies:** These are essential for the website's proper functioning and to deliver the requested service. For example, they are used to manage sessions, store user data, enable navigation, or track items in a cart. These cookies don't require your consent.
- **Analytical Cookies:** These help assess the effectiveness of our services or improve the website's design by collecting aggregated data on visitors and their interactions. If anonymized, these cookies may be set without your explicit consent.

- **Profiling Cookies:** These cookies are used to track actions or repetitive behaviors to identify users or groups based on interests, allowing us to provide personalized services and targeted advertising. Profiling cookies require your explicit consent.

B. By Publisher

- **First-party Cookies:** These cookies are set directly by the website you are visiting and processed by its publisher.
- **Third-party Cookies:** These are set by external providers and can track users across different websites for purposes like analytics or advertising. Please refer to the privacy policies of these third parties for more details.

C. By Duration

- **Session Cookies:** These expire once you finish your browsing session.
- **Persistent Cookies:** These remain on your device for longer, helping to remember your preferences or settings for future visits.

Cookie Settings

You can disable (in whole or in part) technical cookies through the specific functions of your browser. However, please note that if you do not allow technical cookies, you may not be able to use the Website, view its contents, or take advantage of its services. Disabling technical cookies may result in some services or features of the Website being unavailable or not working properly, and you may be required to modify or manually enter certain information or preferences each time you visit the Website.

The choices you make regarding the Website's cookies will be recorded in a cookie. However, in some circumstances, this cookie may not function correctly: in such cases, we recommend deleting the unwanted cookies and inhibiting their use through your browser's features.

Your cookie preferences will need to be reset if you use different devices or browsers to access the Website.

You can find information on how to manage cookie settings on certain browsers via the following links:

- Chrome
- Firefox
- Internet Explorer
- Safari

Regarding your rights under applicable Data Protection Laws, please refer to Section 7 above.

9. Changes

We may modify or update this Policy, also in light of future changes to applicable Data Protection Laws or if we implement new features or functionalities that process personal data.

Last Updated: April 09, 2025