

PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA

pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 - GDPR
rev. 1.0 of 13/10/2026

Introduction

The Controller – in compliance with Regulation (EU) 2016/679 (GDPR) – intends to provide, by means of this document, information on the processing of personal data supplied by the data subject and/or collected from third parties, in the context of or in connection with a proposal or a relationship, including a potential one, within the activities carried out by ALOT: EU project design and access to public funding and grants (European, national and regional), consultancy on sustainability and innovation, energy efficiency and digital transition. This notice applies to all the above activities.

1. Data controller

The data controller is **ALOT S.r.l.**, with registered and operating office at Via Cipro 16, 25124 Brescia (BS), Italy – VAT No./Tax Code 03667530988, REA BS-553480, represented by its pro tempore legal representative, Sole Director Dott. Guido Piccoli.

Channel	Contact details
Telephone	+39 030 2477956
Email	info@alot.it
PEC (certified email)	alotsrl@pec.alot.it
Website	www.alot.it

To exercise the rights described in this notice, or for any request concerning the processing of their personal data, the data subject may contact the Controller at the contact details above, using “Privacy – Data subject request” as the subject.

2. Purposes of processing and legal basis

Personal data are processed for the purposes and on the lawfulness conditions set out in Article 6 of the GDPR, broken down by category of data subject:

Category of data subjects	Purposes of processing	Legal basis (Art. 6 GDPR)
Clients and prospects (companies and public administrations)	Management of the pre-contractual phase, conclusion and performance of consultancy contracts/assignments (EU project design and access to public funding and grants, sustainability and innovation, energy efficiency and digital transition); assistance in preparing and managing public funding applications; administrative, accounting and tax obligations	Art. 6(1)(b) (contract/pre-contractual measures); Art. 6(1)(c)
Suppliers and project	Management of the supply/collaboration	Art. 6(1)(b) and Art. 6(1)(c)

ALOT S.r.l.

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partners	relationship, administrative and tax checks, coordination within projects and contracts	
Contacts via the website www.alot.it or other channels (email, telephone)	Replying to requests for information voluntarily submitted by the data subject	Art. 6(1)(b) (pre-contractual measures); Art. 6(1)(f) (legitimate interest in handling requests received)
Any informative or promotional communications on ALOT initiatives and services	Direct marketing	Art. 6(1)(a) (specific consent, revocable at any time)
Contacts who have given their specific consent	Profiling of contacts (e.g. segmentation by sector/topic of interest) in order to personalise informative and promotional communications	Art. 6(1)(a) (specific, separate consent, revocable at any time)

ALOT does not carry out automated decision-making that produces legal effects concerning the data subject or similarly significantly affects them, within the meaning of Article 22 GDPR. Subject to the data subject's specific consent (Art. 6(1)(a) GDPR), ALOT may carry out profiling for marketing purposes, consisting in the segmentation of contacts by business sector and/or topic of interest expressed (including through the contact form on the website www.alot.it), for the sole purpose of personalising the informative and promotional communications sent; this activity does not involve automated decisions with the effects referred to in Article 22 GDPR, and the data subject has in any case the right to object at any time to such profiling as well (Art. 21 GDPR; Recital 70 GDPR). Where ALOT sends by email to its existing clients communications relating to services similar to those already provided, such processing may be based on Article 6(1)(f) GDPR and Article 130(4) of Legislative Decree 196/2003 (so-called "soft spam", i.e. the "soft opt-in" exception), without the need for consent, without prejudice to the right to object in every communication.

3. Categories of personal data processed

Within the purposes indicated above, ALOT processes the following categories of personal data, relating mainly to contact persons/representatives:

- o Identification and contact data: first name, surname, company role/function, email address, telephone number
- o Identification data of the company/entity: company name, VAT No./Tax Code, registered office
- o Contractual and administrative-accounting data: financial terms, invoicing data, bank details for payment purposes
- o Technical and project data relating to consultancy assignments, where provided by the client for the purposes of the assignment (by way of example and not exhaustively: plans, budgets and project documentation for EU project design and funding applications; sustainability and innovation plans and strategies; cadastral data, energy consumption and plant and/or building characteristics for energy efficiency)
- o Data of representatives of project partners, implementing bodies and entities involved in national, regional and European partnerships and consortia set up to take part in public funding calls and programmes

Within the purposes described above, ALOT does not process special categories of data within the meaning of Article 9 GDPR (e.g. data concerning health, racial or ethnic origin, religious beliefs) or data relating to criminal convictions and offences within the meaning of Article 10 GDPR. Where a client, supplier, prospect or project partner provides ALOT with data of natural persons other than their own corporate representatives (e.g. owners of properties subject to works, employees or collaborators of the supplier or partner involved in the activities), such data, which come from the party providing them and

are not collected from the data subject (Article 14 GDPR), are processed exclusively for the management of the existing contractual or pre-contractual relationship and with the same safeguards provided for in this notice. The party providing the data is responsible for having informed such data subjects and for being entitled to disclose their data.

4. Processing methods and security measures

Personal data are processed by electronic means and, to a residual extent, on paper, with logic strictly related to the purposes indicated, in compliance with the principles of lawfulness, fairness, transparency, data minimisation, accuracy, storage limitation, integrity and confidentiality set out in Article 5 GDPR.

Pursuant to Article 32 GDPR, ALOT adopts technical and organisational measures appropriate to the risk, including:

- o authentication and access-profile management for information systems
- o periodic updating of systems and protection tools (antivirus, firewall)
- o periodic data backups
- o training and instructions for personnel authorised to process data (Articles 29 GDPR and 2-quaterdecies of the Italian Privacy Code)
- o contractual agreements with service providers acting as data processors (Article 28 GDPR)

5. Disclosure of data and categories of recipients

Personal data may be disclosed, within the limits strictly relevant to the purposes indicated above, to the following categories of recipients, appointed as data processors under Article 28 GDPR where they act on behalf of ALOT, or acting as independent controllers:

- o consultants and freelance professionals used by ALOT (e.g. tax, legal and employment consultants)
- o credit institutions, for payment management
- o IT, cloud and hosting service providers (including the non-EU providers referred to in the following paragraph)
- o public bodies, authorities and organisations competent in the fields of EU project design, public funding and grants, sustainability, innovation and energy efficiency (by way of example and not exhaustively: the European Commission and its executive agencies, Regions, the Italian Agency for Territorial Cohesion, Invitalia, Cassa Depositi e Prestiti, GSE, ARERA, GME, MASE, MIMIT, the Italian Revenue Agency), where sector legislation requires the submission of files, applications or communications on behalf of or on the instructions of the client
- o supervisory and control bodies, in the cases provided for by law
- o project partners, partnership lead partners and other implementing bodies, within national, regional and European consortia and partnerships set up to take part in public funding calls and programmes

Data are not subject to dissemination and are not transferred to unspecified parties.

6. Transfer of data to non-EU countries

To provide certain IT services (by way of example, Microsoft 365 and Google Workspace tools), ALOT uses providers that also process data outside the European Economic Area (EEA), in particular in the United States of America.

Such transfers are carried out in compliance with Articles 44-49 GDPR, on the basis of one of the following instruments:

- o the European Commission's adequacy decision on the EU-U.S. Data Privacy Framework (Commission Implementing Decision (EU) 2023/1795 of 10 July 2023), for providers certified under that framework;
- o alternatively, the Standard Contractual Clauses approved by the European Commission with Implementing Decision (EU) 2021/914, supplemented where necessary by additional security measures.

To obtain a copy of the standard contractual clauses applied, or information on the safeguards adopted, the data subject may contact the Controller at the contact details given in paragraph 1.

7. Data retention period

Personal data are retained for a period not exceeding that necessary to achieve the purposes for which they were collected, in compliance with the storage limitation principle set out in Article 5(1)(e) GDPR:

Purpose	Retention period
Pre-contractual data (negotiations not resulting in a contract)	Up to 2 years from the last contact, unless otherwise agreed
Contractual data (clients and suppliers)	For the entire duration of the relationship and, subsequently, for the ordinary limitation period set by the Italian Civil Code (10 years)
Tax and accounting documents	10 years pursuant to Article 2220 of the Italian Civil Code and the tax legislation in force
Documentation relating to projects funded under public funding calls and programmes (European, national and regional)	For the period required by the call, the programme or the grant/concession agreement, where longer than the periods indicated above, without prejudice to any interruption of the period in the event of legal proceedings or at the request of the competent authority
Data processed on the basis of consent (marketing and profiling)	Until the data subject withdraws consent
Data collected through the contact form with no contractual follow-up	Up to 12 months from the request, without prejudice to further legal obligations

At the end of the periods indicated, data are deleted or anonymised, unless otherwise required by law.

8. Data subject rights

The data subject may exercise the following rights against the Controller:

- o Right of access to their personal data (Art. 15 GDPR)
- o Right to rectification of inaccurate data (Art. 16 GDPR)
- o Right to erasure, “right to be forgotten” (Art. 17 GDPR)
- o Right to restriction of processing (Art. 18 GDPR)
- o Right to data portability (Art. 20 GDPR)
- o Right to object to processing (Art. 21 GDPR), in particular for direct marketing purposes, including any related profiling
- o Right to withdraw consent at any time, without affecting the lawfulness of processing based on consent given before its withdrawal (Art. 7(3) GDPR)

These rights may be exercised by sending a request to the Controller at the contact details given in paragraph 1. The Controller will respond without undue delay and, in any case, within one month of receipt of the request; this period may be extended by two months in the case of complex or numerous requests, giving the data subject the reasons within one month of receipt of the request (Article 12(3) and (4) GDPR).

Without prejudice to any other administrative or judicial remedy, a data subject who considers that the processing of their personal data infringes the legislation in force has the right to lodge a complaint with the **Garante per la protezione dei dati personali** (Italian Data Protection Authority, www.garanteprivacy.it), pursuant to Article 77 GDPR.

The exercise of the rights described above may be delayed, restricted or excluded, by reasoned notice given without delay, within the limits and for the time in which this constitutes a necessary and proportionate measure to safeguard the interests referred to in Article 2-undecies of Legislative Decree 196/2003 (including the exercise of a right in judicial proceedings and the related preparatory activities).

9. Nature of the provision of data

The provision of personal data for the purposes connected with the conclusion and performance of the consultancy contract/assignment (paragraph 2) is necessary: failure to provide it makes it impossible to proceed with the contractual or pre-contractual relationship.

For direct marketing purposes based on consent, the provision of data is instead optional: any refusal or subsequent withdrawal of consent has no consequence on the performance of the existing contractual relationship, but precludes the possibility of receiving informative or promotional communications.

The giving of consent to the profiling of contacts referred to in paragraph 2 is also optional and independent of the consent to direct marketing: any refusal or subsequent withdrawal does not preclude the possibility of receiving non-personalised informative or promotional communications, for which any consent to direct marketing given separately remains valid.

10. Data Protection Officer (DPO)

In light of the nature, scope and purposes of the processing carried out, as well as the size of the company, ALOT is not among the entities for which the appointment of a Data Protection Officer (DPO) is mandatory under Article 37 GDPR, as it does not carry out regular and systematic monitoring of data subjects on a large scale or large-scale processing of special categories of data. ALOT has therefore not appointed one. This assessment is consistent with the criteria set out in the Article 29 Working Party Guidelines on Data Protection Officers (WP243 rev.01), endorsed by the EDPB.

For any request concerning the processing of personal data, the data subject may in any case contact the Controller at the contact details given in paragraph 1.

11. Updates to this notice

This notice may be amended over time, including as a result of legislative or organisational changes. Any updates will be made available on the website www.alot.it and/or communicated to data subjects in the manner deemed most appropriate. Please consult the most up-to-date version of this document periodically.

12. Legislative references and institutional sources

- o [Regulation \(EU\) 2016/679 \(GDPR\) – EUR-Lex](#)
- o [Legislative Decree No. 196 of 30 June 2003, as amended by Legislative Decree No. 101 of 10 August 2018 \(Italian Privacy Code\) – Normattiva](#)
- o [EDPB Guidelines \(formerly Article 29 Working Party\) WP260 rev.01 on transparency under Regulation 2016/679](#)
- o [EDPB Guidelines \(formerly Article 29 Working Party\) WP251 rev.01 on automated individual decision-making and profiling for the purposes of Regulation 2016/679](#)
- o [Commission Implementing Decision \(EU\) 2023/1795 of 10 July 2023 on the adequacy of the EU-U.S. Data Privacy Framework – EUR-Lex](#)
- o [Commission Implementing Decision \(EU\) 2021/914 of 4 June 2021 on standard contractual clauses – EUR-Lex](#)
- o [Garante per la protezione dei dati personali \(Italian Data Protection Authority\)](#)