

Privacy Policy pursuant to articles 13 and 14 of Regulation (EU) 2016/679

The company MURINEDDU CAPITAL DI PAULO MURINEDDU, operating as LakeNetworks (di seguito, "LakeNetworks", "noi", "ci", "nostro", "ditta"), registered in Italy with legal address in Via Gambella 4, 07037, Sorso (SS), Italy, VAT number: 02786130902, fiscal code: MRNPLA00B14I452I, as the data controller (the "controller"), provides this privacy policy to inform its clients, potential clients, and, in general, every third party (e.g. delegates, legal representatives, etc.) that interact with the company as representatives or on behalf of clients or potential clients (the "data subjects"), regarding methods and purposes of processing personal data ("Data"), collected, in compliance with regulations.

Data controller	MURINEDDU CAPITAL DI PAULO MURINEDDU Via Gambella 4, 07037, Sorso (SS), Italia info@lakenetworks.it
Data Protection Officer (DPO)	Paulo Murineddu – dpo@lakenetworks.it

Data subject to processing and collection by the controller may be acquired:

- Directly from the Data Subject, including via remote communication methods used by the Controller (e.g., websites, smartphone and tablet apps, call centers, etc.);
- From third parties (e.g., entities conducting operations on behalf of the Data Subject, business information companies, etc.);

Data from public sources will also be used, like public registries, lists, public documents (e.g., information from the business registry at the Chambers of Commerce or equivalent).

Processed data

Personal data	Name, surname, residence/domicile, nationality, province (or equivalent) and city of residence, phone number, fiscal code (or equivalent) or VAT number, codice destinatario (or equivalent), company name, email address, PEC (or equivalent), details of the identification document of which a copy is acquired where required.
Bank data	IBAN, bank data, information regarding payment method (except full payment card number/data)
Log	IP addresses, log (system and network)

Purposes of Data Processing

- Pre-contractual relationship management
- Fulfillment of contractual obligations
- Compliance with legal obligations
- Protection of company's rights
- Compliance with order from judicial authorities and/or independent authorities.

Types of Processing

- Data collection via contract forms
- Input into IT systems for contract and administrative management
- Communication to IP registry operators – RIPE NCC
- Sharing with subsidiary/affiliated companies for customer support management
- Data processing (e.g., filtering, search, extraction) for compliance with public authority or judicial orders.
- Selective and automated traffic filtering via antivirus, antispam, and intrusion detection systems

Data Location

LakeNetworks' IT systems are located within the European Union.

Data Communication and Dissemination

Clients are informed that:

- Sent and received data may travel outside the European Union. This may happen due to different reasons, including the behavior or TCP/IP protocol, which determines that the routing of data packets shall be decided by network providers, or the use of DDoS protection systems. Communications with the *lakenetworks.it* website is encrypted.
- Data provided for IP address allocation may be published by European entities like RIPE.
- Le attività legate a fini di giustizia, come intercettazioni, accesso ai dati di traffico e altre operazioni tecniche, sono coperte da segreto istruttorio. Senza uno specifico ordine da parte dell'Autorità Giudiziaria, LakeNetworks non potrà fornire informazioni al Cliente su tali interventi.

Data recipients

External service providers may have access to Customer data when they support the company in providing services. In some cases, third parties such as government authorities, external consultants or business partners may receive Customer data.

Third-Party Data Access

In particular, this may happen in the following cases:

- **Credit Card Payments:**

If the Client pays by payment card, the transaction gets handled by an external service provider. For payments with credit cards, customers' data are acquired directly by STRIPE PAYMENTS EUROPE, LIMITED, based in Ireland. Stripe acts as Data controller pursuant to General Data Protection Regulation (GDPR). Stripe's privacy policy is accessible via the following link: <https://stripe.com/en-it/privacy>

In compliance to GDPR, Stripe may share with us some info regarding the transaction, required to complete the payment and the administrative management. This information includes:

- Transaction details (amount, currency, date, time).
- Transaction ID.
- Payment status (e.g., completed, pending, failed)
- Payment method : type(debit/credit card) and limited details, such as the last digit of the credit card (last 4 digits) and the circuit type (Visa, Mastercard, etc.)
- Customer data: limited information such as name and surname, email address and, in some case, billing address, given by the customer during the transaction.

We don't have access to credit card sensitive data, such as the complete number or the CVV, that are acquired and processed exclusively by Stripe.

All received data are processed in compliance with our privacy policy and used exclusively for the indicated purpose (e.g. transaction completion, administrative management). For more information regarding the data processing by our side, we invite the customer to consult our privacy policy.

- **PayPal Payment:**

If the Customer makes a payment via PayPal, the transaction is managed by **PayPal (Europe) S.A.R.L.**, whose privacy policy is accessible at the following link::

<https://www.paypalobjects.com/marketing/ua/pdf/SG/en/privacy-full.pdf>.

In accordance with the **General Data Protection Regulation (GDPR)**, PayPal acts as a **Data Processor** and may share certain transaction-related information with us, necessary for completing the payment and managing any administrative requirements. The data that may be shared with us includes:

- **Transaction information:** amount, currency, date, and time of the payment.
- **Transaction ID:** a unique code associated with the transaction for traceability.
- **Payment status:** the outcome of the transaction (e.g., completed, pending, failed).
- **Payment method information:** such as the customer's email address associated with the PayPal account used for the payment.
- **Customer data:** limited information like name and email address provided by the Customer during the payment process on PayPal.

Please note that we do not have access to sensitive payment method details, such as the full credit card number, CVV, or other banking information. These details are processed directly by PayPal. All the data we receive is handled in compliance with our privacy policy and is used solely for completing the transaction, issuing the invoice, or fulfilling legal and administrative obligations related to the payment.

- **Reviews and Trustpilot use**

LakeNetworks uses the Trustpilot service to allow its Customers to leave reviews about the products and services offered. The review submission button on our website links directly to Trustpilot's terms and conditions, which can be accessed at the following link:

<https://it.legal.trustpilot.com/for-reviewers/end-user-privacy-terms>.

Data Processed for Review Invitations

If LakeNetworks directly invites the Customer to leave a review through the Trustpilot service, the following personal data may be shared with Trustpilot:

- Name and surname;
- Email address;
- Company name (for business customers).

This data will be used exclusively to enable the Customer to leave a review on the Trustpilot platform. The processing of data by Trustpilot will be carried out in accordance with their privacy policy. LakeNetworks is not responsible for the data processing conducted by Trustpilot; Customers are encouraged to review Trustpilot's terms for more details on the processing of personal data.

All shared data will be processed in compliance with applicable regulations and used solely for the purposes stated above.

- **Third Countries**

Data is transferred to third countries in accordance with the eligibility requirements established by law. Data will not be transferred to a third country unless necessary for the execution of the contract with the Customer, without the Customer's consent, unless the transfer is essential for establishing, exercising, or defending a legal claim, or in the absence of other applicable exceptions.

- The transfer of data to a third country will only occur if an adequacy decision under Article 45 of the GDPR is in place, or if appropriate safeguards are provided under Article 46 of the GDPR.

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Exercise of Rights under Articles 13-25 of Regulation (EU) 679/2016

Regulation (EU) 679/2016, under Articles 13 to 22, grants data subjects a series of rights, including the right to request the rectification of data processed by LakeNetworks, as well as the deletion or restriction of processing. To exercise these rights, data subjects may contact the Data Protection Officer at the following address dpo@lakenetworks.it.

These rights may also be exercised against LakeNetworks following the termination of the contractual relationship, for any reason. Data subjects can exercise these rights by contacting the Data Protection Officer and clearly specifying the personal data subject to the request and the reasons for requesting modifications, updates, deletion, restriction, or portability of the data.

Data subjects also have the option to assert their rights under Regulation (EU) 679/2016 by contacting the Data Protection Authority or the competent Judicial Authority.