

Privacy Policy

This privacy policy is to provide all the information on the processing of personal data carried out by Aryel S.r.l. when the User accesses and register the platform (as indicated below)

Version no. 2 – October 2025

This privacy policy (version no. 1 dated 15 March 2024) is provided by Aryel S.r.l. and concerns the activities that Aryel and/or the third parties indicated in paragraph 7 below carry out in order to provide digital advertising services.

1. Introduction – Who we are?

Aryel S.r.l. with registered offices in Milan (Italy), Via Morimondo 26, 20143, VAT n. 11294810962 (hereinafter, “Controller”), manager of the platform Aryel accessible from the website www.aryel.io (hereinafter, the “Platform”), in its capacity as data controller in relation to personal data pertaining to the users using the Platform (hereinafter, the “Users”) hereby provides the privacy policy pursuant to art. 13 of the Regulation EU 2016/679 of the Council of 27 April 2016 (hereinafter, “Regulation” or “Applicable Law”).

2. How to contact us?

Users can contact the Company at any time for any information on this privacy policy, using the following methods:

- by sending a registered letter with return receipt to the registered office of the Company Milan, Via Morimondo, 26 – 20143;
- by sending an email to: hello@aryel.io

You can also contact the Data Protection Officer (DPO) of the Company, whose contact details are as follows: email address dpo@aryel.io

3. What do we do?

By browsing and registering to the Platform, Users will have the opportunity to access and use the service provided by the Controller (hereinafter, “Services”). In connection with the activities that may be carried out through the Platform, the Controller collects personal data relating to Users.

We operate in the field of digital advertising, working with third-party publishers, advertising agencies and/or clients, as well as third parties to deliver advertising messages relevant to those browsing the internet and to measure advertising campaigns carried out on behalf of advertising agencies/clients, also using owned and third-party technology.

Since cookies and/or other tracking tools – similar to cookies – are used through our Services for various purposes, in this privacy policy we would like to explain what these tools are and how they are used.

Some tracking tools are used and controlled directly by the Company. Through these tracking tools, the Company collects and processes certain personal data concerning you. In this privacy policy, pursuant to art. 13 of the Regulation EU 2016/679 of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data (hereinafter, the “Regulation”) and pursuant to Italian Legislative Decree no. 196/2003 and subsequent amendments and additions (hereinafter, the

“Code” and, together with the Regulation, the “Applicable Law”), we will explain how we collect this data, for what purposes and what your rights are.

Other cookies on the Website of Origin, on the other hand, are carried and controlled by third parties. In this privacy policy you will find links to the privacy policies published by these third parties, which we ask you to read carefully (see paragraph 7 below).

Cookies are only one of the tools used by our Services. In fact, it is also possible that other tracking tools (such as pixels, tags, Software Development Kits (SDK), etc.) may be used for the same purposes of profiling (in order to deliver personalized behavioural advertising, etc.) or analysis and measurement (analysis and monitoring of the behaviour of users of the Website of Origin, analysis of the advertising campaigns delivered, etc.) as set out below.

If you are not familiar with cookies and/or other tracking tools, please read this policy carefully so that you can be aware of your choices.

Company by choice, only processes so-called pseudonymous data (i.e. data that will never allow us to identify you), only alphanumeric codes and never directly identifies you. Therefore, this means that we will never know the name, surname or email address of a user that has visited a Website of Origin. The data collected autonomously by the Company, as explained in this policy, may be combined also with other information which the Company may receive from third parties or other partner, with the only intent of deliver advertising campaigns more in line with the preferences of the users. The Company requests to these subjects to maintain reserved all the information shared and the Company will use this information only for the purposes described below. In order to do this, the Company enter into specific contracts with third parties and partners, and it requires these subjects to guarantee that they collected and process the data in compliance with the Applicable Law. We process data in order to:

- deliver basic or targeted advertising campaigns (or content) to users across devices;
- create pre-packaged audience segments;– provide aggregated information about User interests;
- monitor, analyze and improve the effectiveness of online advertising campaigns (or online content);
- analyze, develop, improve and optimize our services;
- apply market research to generate audience insights;– control and maintain the security of our systems.

4. What technologies we use

To provide the Services, the Company uses:

1. an online tag solution that enables the counting of actions performed within the Website of Origin, in real time and in relation to the advertising that we deploy (to measure the effectiveness of the advertising campaigns). Through this system, the Company may process and collect, in its capacity of data controller, data relating to the User, such as:
 - IP address (stored after hashing, therefore encrypted)
 - user agent
 - information relating to browser type and User settings
2. The above-mentioned data may be associated with information relating to the advertising campaign delivered by a publisher and the User’s interaction with the advertising campaign itself (e.g., clicks, time of day, subject that delivered the campaign, type of advertising campaign, etc.), in order to count the delivery of such campaign and to prepare accurate reports.

3. with relation to a certain type of Services, the Company might study your interaction with digital advertising campaigns, in particular if they are interactive, and the Company might collect information in relation to the User's perception of such campaign, such as for how long the campaign was viewed / interacted.
4. of the ad server 'Google Ad Manager' (hereinafter, "AdServer") provided by Google Ireland Limited, located at Gordon House, Barrow Street, Dublin 4, Ireland (hereinafter, "Google"). Through the AdServer, profiling cookies are installed by the Company on the Website of Origin. Profiling cookies are used to create a profile of Users based on their preferences and tastes expressed during internet browsing, in order to display advertising messages consistent with their profile. In this way, the advertising messages that the Users will see on the Website of Origin can be more interesting to them. The profiling cookies installed by the AdServer are permanent and have a maximum duration of 13 months.

Moreover, the Company informs Users that, for the provision of the AdServer to the Company, Google declares itself as the independent Data Controller of Users' personal data. Therefore, the Company has no control or power over the processing carried out by Google for data collection and subsequent processing resulting from the use of the AdServer, as it is merely a user of the ad serving service (which is technically managed by Google). For information regarding the possible transfer of Users' personal data abroad by Google or the retention period of the data processed in the context of using the AdServer, Users can refer to [Google's privacy policy](#) and/or to the following [link](#).

Users can object to the use of profiling cookies by the AdServer through the following [link](#). The Company also informs Users that through Google's AdServer, advertisers or additional third parties may use cookies linked to advertising messages in order to collect information about the User's browsing activities on the Website of Origin.
5. other cookies and/or other profiling tracking tools through which the Company collect data as autonomous data controller or, in some cases (if specified below), as co-controller together with the provider of such tools, on the Website of Origin, with the references to the modalities through which it is possible to object to such use:
 - Google Analytics
Monitoring platform of Google (traffic monitoring on websites, landing pages, etc. and tracking of conversion actions, visits , page views, etc.). We provide links to a [Google's information page](#) and to [Google's opt-out mechanism](#). Google Analytics supports an optional browser add-on that, once installed and activated, disables measurement by Google Analytics for any website visited by a user. Please note that this add-on only deactivates Google Analytics measurement.
 - Google Tag Manager
Google's tool for managing tags on web pages: [information page](#).
 - Display & Video 360
Google's advertising platform (Demand Side Platform – DSP): [information page](#).
 - Campaign Manager 360
Google's advertising platform (Adserver): [information page](#).
 - Google Ads
Google's advertising platform (delivery of ads on search engines and on the network of Google's websites): [information page](#).
 - Meta
Meta Platforms Ireland Limited (4 Grand Canal Square, Grand Canal Harbor, Dublin 2, Ireland; "Meta") is a joint data controller with the Company for the for the collection , through the Meta pixel on the Website of Origin, and subsequent transmission to Meta, of data relating to the actions performed by Users on the Website of Origin. The necessary information required under Article 13(1)(a) and (b) of the Regulation is set out in Meta's Privacy Policy available at the following [link](#). Further information on how Meta processes personal data, including the legal basis to which Meta refers and how to exercise your rights against Meta, can be found in [Meta's Privacy Policy](#). The Company

entered with the provider into the [Controller's Addendum](#) to determine the respective responsibilities regarding compliance with the obligations established by the Regulation in relation to the processing subject to joint data controllership. Among the joint data controllers, Meta is responsible for the data subjects' rights under Articles 15-20 of the GDPR in relation to the personal data retained by Meta after the processing carried out in joint controllership with the Company.

- TikTok

The TikTok's pixel is used by the Company in order to collect and analyze the data relating to the advertising campaigns delivered through the services of TikTok, in order to measure and optimize them. TikTok (with the term "TikTok" we refer to TikTok Information Technologies UK Limited, 6th Floor, One London Wall, London, EC2Y 5EB, United Kingdom ("TikTok UK") and TikTok Technology Limited, 10 Earlsfort Terrace, Dublin, D02 T380, Ireland ("TikTok Ireland")) is joint controller with the Company and the information necessary pursuant to the Regulation (among which there are the information on how to exercise the rights under the Regulation towards TikTok) are provided into the [notice of TikTok](#). The Company entered into an agreement with TikTok (available at the following [link](#)) to determine the respective responsibilities regarding compliance with the obligations established by the Regulation in relation to the processing subject to joint data controllership. Among the parties, TikTok is responsible for the rights of data subjects pursuant to articles 15-20 of the Regulation in relation to personal data retained by TikTok after processing carried out jointly with the Company.

5. Legal basis

5.1 Consent

The legal basis for the processing carried out to provide the Services is the prior consent of the User (art. 6, paragraph 1, letter a) of the Regulation).

As set out in the Applicable Law, your prior consent is required to install tracking tools that does not have a technical purpose. For this reason, when you access the Website of Origin, a special banner is displayed or, in some cases, a so-called Consent Management Platform (hereinafter, "CMP"), which you can use to state your preferences.

You are, of course, free to not give your consent to the installation of profiling tracking tools and to opt-out of using them at any time, without this affecting your ability to visit the Website of Origin and enjoy its content in any way.

As a sign of its commitment, Aryel is a member of the IAB Europe Transparency & Consent Framework (hereinafter, the "IAB Framework" or the "TCF") – the European framework for transparency and consent management – and complies with the Specifications and Policies of the IAB Framework. The Vendor ID of Aryel is 1237, in the context of the IAB Framework. You may find further information regarding the IAB Framework on the [IAB Europe's website](#).

If the User provides his/her consent to the use of cookies and/or other tracking tools via the CMP, the consent expressed will be tracked through technical methods linked to the use of the CMP, allowing for the documentation of the User's choices to be kept up to date in compliance with Applicable Law. In this latter case, the Company may process data and metadata relating to the granular choices made by the User: the possible expression of consent, the details of the granular purposes for which the User has given consent, as well as the User's possible choice to continue browsing while maintaining default settings by pressing the relevant button provided by the CMP on the Website of Origin. Such information might also be passed on to partners and other technologies quoted in this policy.

5.2 Legitimate interest assessment

The following table aims to show that the subsequent processing of data collected with cookies and/or other tracking tools used by Company on Websites of Origin, carried out by the Company under its legitimate interest, is disclosed to Users and is based under a prior legitimate interests' assessment, as required under the IAB Framework. In particular, as a controller under the TCF, Company is required to justify the processing of personal data carried out under legitimate interest for "Special Purpose 1 – Ensure security, prevent and detect fraud, and fix errors" and for "Special Purpose 2 – Deliver and present advertising and content". When assessing Company's legitimate interest, the interests of Company as well as the interests of its publishers and its advertisers (and their respective intermediaries and agencies) were considered. In particular, the table below summaries Company's legitimate interest assessment.

CONTEXT	Context of processing. Users will receive notice of the subsequent processing and of the legal basis under which Company processes the data through the Consent Management Platform ("CMP"), connected to the TCF, used by Company's publishers and/or advertisers on the Websites. As required under the applicable law and the TCF, a balancing test was carried out by Company in which it was confirmed that, having prior obtaining the consent of the user for the "Purpose 1 – Store and/or access information on a device", the processing for the two subsequent Special Purposes at stake carries no risk of undue negative impact on the data subjects' interests or fundamental rights and freedoms.	
PURPOSE TEST	Purpose of processing: Special Purpose 1 – Ensure security, prevent and detect fraud, and fix errors.	Purpose of processing: Special Purpose 2 – Deliver and present advertising and content.

	Company will subsequently process the data, collected through cookies and/or other tracking tools, only to: • monitor for and prevent unusual and possibly fraudulent activities (for example, preventing that the clicks on an ads derive from the use of bots); • ensure the systems and processes work properly and securely; and • correct any problems Company (or its clients or providers) may encounter in the delivery of ads. Both Company and advertisers will benefit from the prevention and detection of frauds (as, by way of example, this processing will avoid advertisers to pay for ads that were not delivered to human or clicked by human). Both Company and publishers will benefit from the fixing of errors encountered as this will increase the possibility of monetization of the publishers' Properties without losing any valid traffic. Moreover, also the User will benefit from the processing at stake as Company will be able to ensure data is securely transmitted, as well as it will be able to correct any problems that the User encounters in the delivery of an ad or in his/her interaction with the ad.	Company will subsequently use certain information (like an IP address), collected through cookies and/or other tracking tools, to ensure the technical compatibility of the advertising, and to facilitate the transmission of the ad to the User's device. In particular, the said information will be used by Company in order to: • receive and respond to an ad request or to a User's interaction with ad; • delivery of ad-files to an IP address or send the User to a landing page; and • logging that an ad was delivered, without recording any personal data about the User. Both Company and the advertisers benefit from the processing activities at stake, as Company shall be able to deliver the ads as requested by the advertisers. At the same time, being able to deliver the ad to the User will benefit the publishers as their intention is to monetize the advertising spaces available in the Properties. Finally, also the Users will benefit from this processing activity as Company will be able to provide a response to a request deriving from the Users' devices (such as a click on an ad).
NECESSITY TEST	The intended processing is necessary and proportionate for the purposes and interests explained above considering that Company is not allowed to use the data for any other data processing operation allowed under a different purpose of the TCF (such as improving its system). There are no less intrusive alternatives that use less, or no, personal data as the use of personal data is necessary in order to carry out the purpose specified.	The intended processing is necessary and proportionate for the purposes and interests explained above considering that Company is not allowed to use the data for any other data processing operation allowed under a different purpose of the TCF (such as logging personal data about the user to which an ad was delivered). There are no less intrusive alternatives that use less, or no, personal data as the use of personal data is necessary in order to carry out the purpose specified.

BALANCING TEST	Taking into account the nature and purposes of the processing, it is possible to affirm that risks for Users to their rights and freedoms are very low. In particular, among the others, Company evaluates the following aspects: • Nature of the data: no special category of personal data is processed, Moreover the data does not contain precise location data nor demographic or psychographic information. The data processed are pseudonymised, thus there are less privacy risky, considering that Company does not know the real identity of a User; • Data subjects' characteristics: Company does not voluntarily collect data pertaining to vulnerable population (such as children). • Data subject's reasonable expectations: a reasonable person would expect the processing in light of the particular circumstances. Moreover, Users are informed about the processing through the CMPs' user interfaces. • Effects on availability of a service: the processing activity carried out by Company has no effect on the availability of the service offered to Users by the publisher of the Website. There are also other mitigating factors: • Recital 47 of EU Regulation 2016/679 explicitly states that fraud prevention and direct marketing may represent legitimate interests of the controller; • The prevention of fraud, the misuse of services, IT and network security are some of the most common contexts, in which the issue of legitimate interest may arise according to Article 29 Working Party (Opinion 06/2014 on legitimate interest); • According to the "Report of the work undertaken by the Cookie Banner Taskforce", adopted by the European Data Protection Board on 17 January 2023, "Concerning the subsequent processing activities undertaken by the controller of data, meaning the processing which takes place after storing or gaining access to information stored in the terminal equipment of a user in accordance with Article 5(3) Directive 2002/58/EC (for example, the placement or reading of cookies), the delegations confirmed that the applicable framework is the GDPR (including to consent, even if given at the same moment of the placement of cookies, as far as this consent constitutes the legal basis of the subsequent processing), in line with the conclusions of EDPB Opinion 5/2019 on the interplay between the ePrivacy Directive and the GDPR". Even if Users cannot execute the "Right to Object" to these legitimate interests because of the fact that the "Right to Object" to Special Purposes is not technically supported by the TCF, Users are always free to withdraw their consent to the Purpose 1", thus implying for Company the interruption of any collection of data carried out through the use of cookies and/or other tracking tools and any subsequent processing.
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In conclusion, considering that (a) the TCF specifies two Special Purposes, that Company needs to fulfill in order to i) technically be able to serve ads over the network to an IP address, and ii) ensure security and fix errors; and (b) the only legal basis that is applicable to these Special Purposes under the TCF is the

legitimate interest, Company is going to carried out the processing activities (“Special Purpose 1 – Ensure security, prevent and detect fraud, and fix errors” and “Special Purpose 2 – Deliver and present advertising and content” of the TCF) to achieve the above mentioned benefits for ourselves and others (such as Company’s advertisers and publishers), considering that there are no risks nor impacts on Users and Company believes its interests outweigh those interests of the Users.

For any information, to exercise your rights, or to obtain further information or explanations, User can consult the other paragraph of this policy or contact Company by using the modalities explained in this policy.

6. Purposes of the processing

We use the data collected for:

- marketing, re-targeting and profiling (i.e. to show you advertisements and commercial offers that are as close as possible to your preferences) and to help advertisers deliver non-invasive advertisements that are closer to the needs of the User;
- measuring the performance of campaigns delivered by the publishers and/or the Company itself and, where appropriate, providing statistical analysis in aggregate form to advertising agencies/clients and/or the publishers of the Website of Origin;
- providing recommendations and/or reports and/or insight to advertising agencies/clients on the delivery of advertising campaigns in line with the preferences expressed by the User while browsing and/or in relation to the data they use.

7. Third parties other than the Company

Other tools (such as cookies, pixels, etc.) are installed on the Website of Origin by third parties other than the publisher of the Website of Origin and the Company.

Below is a list of the third parties currently used to provide the Services, with an indication of the links to the information pages created by their developers (also containing information on how to opt-out of installing them, and on the relevant retention periods):

Third Party	Link to the privacy policy
Amazon	https://www.amazon.co.uk/gp/help/customer/display.html?nodeId=201909010
Xandr	https://www.xandr.com/privacy/platform-privacy-policy/

Further partners of the Company

Through the Website of Origin, if you give your consent, additional partners of ours may process personal data in order to provide advertisement and/or make measurements on the advertisement already delivered. Please refer to the related policies: i) for which links are provided next to each vendor within the CMP; ii) for which links are provided within the policy of the Website of Origin; and/or iii) for which links are provided by the publishers that provide the advertising content that the User interacted with before landing on the Website of Origin, within their properties.

8. How to manage cookies and/or other similar tracking tools and opt-out of using them

There are various options for managing, disabling and deleting cookies and/or to opt-out to the use of similar tracking tools.

1. Change your browser settings

Follow the instructions provided by the manufacturer of the browser you use to find out how to manage, disable or delete all cookies:

- [Explorer](#);
- [Edge](#);
- [Chrome](#);
- [Firefox](#);
- [Safari](#);
- [Opera](#).

2. Use the special interactive tools

Consult the privacy policies of the third parties that install profiling tools (paragraph 7) in order to be aware of the modalities available to you to manage, disable and delete cookies and, more generally, to opt-out to their use of tracking systems. Remember that by disabling third-party tools: (i) you opt-out of using them not only on the Website of Origin but on all websites on which they are used; and (ii) the ability to browse the Website of Origin and use its functions will not be affected in any way.

3. Use the website [Your Online Choices](#)

Your Online Choices is an Internet website managed by the non-profit association European Interactive Digital Advertising Alliance (EDAA), the Italian version of which can be found at the following [link](#). It provides information on [behavioural advertising](#) based on profiling cookies and allows Internet users to easily [opt-out](#) of the installation of the main profiling cookies installed by advertisers and used on Internet websites. Before using this tool, we recommend that you carefully read the general [terms and conditions](#) of service of the Your Online Choices website, as well as the frequently asked questions ([FAQ](#)) and the [help page](#).

Use Your Online Choices sensibly. Although Your Online Choices brings many of the world's leading advertising companies that use cookies together, some of the third parties that install cookies through the website may not have signed up with Your Online Choices. Therefore, the use of Your Online Choices does not guarantee that you will receive third-party cookies while browsing the website. Remember, also, that if you delete all cookies from your browser, even the technical cookies issued by Your Online Choices to remember your preferences may be deleted, rendering third-party cookies active once again.

4. Mobile Advertising ID

To opt-out on many devices such as iPhone, iPad or Android devices, we recommend that you consult the device settings and instructions provided by the device manufacturer. Below we have provided some examples for information purposes only and we decline all liability or warranty on their operation or current relevance.

○ Apple iOS

Open settings, then "Privacy" -> "Location Services" -> "System Services" and change the option "Location-Based iAds" to "off".

Open settings, then "Privacy" -> "Advertising" and switch the "Limit Ad Tracking" to "on".

To reset your Advertising ID on iOS, open settings, then "Privacy" -> "Advertising" and select "Reset Advertising Identifier".

○ Android

Open Google settings, select "Ads" and then "Reset advertising ID" and select "Opt out of interest-based ads".

5. CMP

For the processing of personal data that, subject to your consent, the Company and/or the third

parties listed in the previous paragraph B may carry out through profiling cookies used on the Website of Origin, you can use the CMP on the Website of Origin and/or the other consent collection mechanism found therein to provide and, if necessary, withdraw consent by following the related instructions. Please note that Aryel is a IAB Framework registered vendor and, through the CMP compliant with the IAB Framework's standard, you will always be able to make granular choices in terms of providing and/or withdraw consent already given.

9. Processing methods, transfer of personal data to a third country and data retention period

As highlighted in the introduction of this privacy policy, the Company may collect and process some of your personal data through cookies and/or other tracking tools that it places directly on the Website of Origin. The Company acts as the "data controller" of these data, in accordance with the provisions of the Applicable Law. We will process the data collected only by electronic means, in a fully automated manner and without human intermediation. Therefore, our employees and partners will never access the content of the personal data obtained through cookies and/or other similar tracking tools, which means that they will never be able to access and/or have PII (Personally Identifiable Information), i.e. information which can identify you directly. Some of our employees and partners, authorised to process personal data pursuant to art. 29 of the Regulation, may carry out maintenance work on the computer systems that host the data, without ever being able to access its actual content. Personal data may be stored on servers managed by third parties (e.g. suppliers of computer systems) or may be managed by parties specializing in online advertising, who act as data processors on the basis of a written appointment by the Company, pursuant to art. 28 of the Regulation.

We inform you that, in compliance with the requirements and guarantees established by the Regulation, your data may be transferred to countries outside the European Economic Area (EEA). Such countries may not offer a level of privacy protection and protection of personal data comparable to the level guaranteed by the Applicable Law; where the Company acts as data controller, it will take the utmost care of the security of the data and will therefore manage such transfers with all the appropriate precautions and safeguards in accordance with the Applicable Law and, in particular, in accordance with articles 45 (Transfer on the basis of an adequacy decision) and 46 (Transfer subject to adequate safeguards) of the Regulation. Specifically:

- for the provision of the Google's services, the Company's provider, Google Ireland Limited, may transfer the pseudonymous personal data of the Users of the Website of Origin outside the EEA, on the basis of the so-called Standard Contractual Clauses or of an Adequacy Decision: in particular, to the United States, the data will be transferred on the basis of the [Data Privacy Framework certification that Google LLC has adopted](#) (more information available at the following [link](#)). In view of the scope of the processing, the nature of the data processed, and the risks of the processing carried out by the supplier, the Company considered the security measures that the supplier guarantees to adopt to protect the personal data to be appropriate;

Please note that some of the third parties indicated in paragraph 7 above – as independent data controllers – may process the personal data collected through the tracking tools installed on the Website of Origin from a location outside the European territory and, therefore, it is recommended that you read their privacy policies carefully for more details.

Moreover, we would like to point out the transfers carried out by Meta (more information [here](#) and [here](#)), and the transfers made by TikTok (more information [here](#) and [here](#)) with respect to the subsequent processing carried out by the latter as autonomous controllers after the initial collection as joint data controller with the Company.

Your personal data will not be communicated to third-party data controllers or disseminated.

Your personal data will be kept by the Company for the time considered strictly necessary to carry out the primary purposes described in this privacy policy, or as necessary for the protection in civil law of both your interests and those of the Company and, in any case, for no more than twenty-four (24) months. The User's personal data collected on the Website of Origin, by means of Aryel's proprietary tag tracking solution, are processed by the Company for the purpose of correct attribution of the delivery of the advertising only for the time strictly necessary and, in any case, for no longer than 24 hours.

10. Your rights

To exercise your rights, or to obtain further information or explanations on this privacy policy, please contact the Company using the following methods:

- by sending a registered letter with return receipt to the registered office of the Company Milan, Via Morimondo 26 – 20143;
- by sending an email to: hello@aryel.io

You can also contact the Data Protection Officer (DPO) of the Company, whose contact details are as follows: email address dpo@aryel.io

Under the Applicable Law, Users have:

1. the right to withdraw their consent at any time, if the processing is based on their consent;
2. the right to access their personal data;
3. (where applicable) the right to data portability (the right to receive all personal data concerning them in a structured, commonly-used and machine-readable format), the right to restrict the processing of personal data, the right to its rectification and the right to delete it ("right to be forgotten");
4. the right to object:
 1. in whole or in part, for legitimate reasons to the processing of personal data, even if pertinent to the collection purposes;
 2. in whole or in part, to the processing of personal data for the purpose of sending advertising material or direct sale, or for the purpose of market research or commercial communications;
5. if they consider that the processing of their personal data is in breach of the Regulation, the right to lodge a complaint with a Supervisory authority (in the Member State in which they usually reside, in the Member State in which they work or in the Member State in which the alleged infringement took place). The Italian Supervisory Authority is the "Garante per la protezione dei dati personali", with registered offices in Piazza Venezia No. 11, 00187 – Rome (<http://www.garanteprivacy.it/>).

The Company is not responsible for the updating of all links that can be viewed in this privacy policy. Therefore, whenever a link is not functional and/or updated, Users acknowledge and accept that they must always refer to the document and/or section of the websites referred to in these links.