



PRIVACY POLICY ON THE PROCESSING OF PERSONAL DATA

pursuant to Article 13 of Regulation (EU) 2016/679

1. Introduction

This policy is provided by Aryel S.r.l. pursuant to Article 13 of Regulation (EU) 2016/679 (“Regulation” or “Applicable Law”) and describes the processing of personal data carried out by Aryel in its capacity as Data Controller in connection with the activities conducted through the corporate website www.aryel.io and the services associated with it.

This policy applies, in particular, to those who: (i) request a sales contact or a demo via the aryel.io website; (ii) register or log in, as a client's point of contact, to the campaign management platform (“Ads Manager”).

2. How to Contact Us — Data Controller and DPO

Aryel S.r.l., with registered office at Via Morimondo No. 26, Milan 20143, VAT No. 11294810962 (hereinafter, the “Data Controller”), may be contacted at any time for any information regarding this privacy policy:

- by sending a registered letter with return receipt to the Data Controller's registered office;
- by using the contact tools available on the aryel.io website.

You may also contact the Data Protection Officer (DPO) of the Data Controller at dpo@aryel.io.

3. Purposes of Processing and Legal Basis

Personal data collected through the aryel.io website is processed by the Data Controller exclusively for the purposes indicated below.

PURPOSES	LEGAL BASIS
Management of requests for commercial contact and demos submitted via the appropriate forms on the website (for example, the “Contact Us” pages and the demo request on the homepage), in order to provide information about the services offered, contact the data subject, and manage the pre-contractual phase.	Article 6, paragraph 1, subparagraph (b) of the Regulation: processing is necessary for the implementation of pre-contractual measures taken at the data subject's request.
Management of registration and access to the Aryel Ads Manager platform by client's points of contact, for the purpose of performing the service agreement and managing the related campaigns, including the operational communications necessary to identify the designated contact person.	Article 6, paragraph 1, subparagraph (b) of the Regulation: processing is necessary for the performance of a contract to which the data subject, or the legal entity represented by the data subject, is a party.
Cybersecurity and the proper functioning of the aryel.io website and the Ads Manager platform, including measures to prevent unauthorized access.	Article 6(1)(f) of the Regulation: the Data Controller's legitimate interest in the security of its systems.

The provision of personal data for the purposes described above is optional; however, failure to provide data marked as required in the respective forms will make it impossible for the Data Controller to respond to the contact request or grant access to the platform.

4. Categories of Data Processed



In relation to the purposes set forth in paragraph 3, the Data Controller processes the following categories of personal data, provided directly by the data subject through the forms on the website:

- identification and contact information (first name, last name, email address, phone number, employer, and job title);
- content of the request or message submitted via the contact forms;
- login credentials and account-related data, for client's points of contact registered on the Ads Manager platform.

The Data Controller does not request or intentionally process special categories of personal data pursuant to Article 9 of the Regulation in connection with the activities governed by this privacy policy. Data subjects are asked not to include such categories of data in free-form messages sent via the contact forms, unless doing so is strictly relevant and necessary.

5. Methods of Processing and Retention Periods

Data processing is carried out primarily by computerized means, in compliance with the principles of lawfulness, fairness, transparency, and data minimization set forth in the Applicable Law.

- Data related to contact requests and demo requests are retained for the time necessary to process the request and, if no contractual relationship is established, for a maximum period of 24 months from the last contact, unless a different period is necessary to protect the Data Controller's rights in legal proceedings.
- The contact information of the client's point of contact, collected for the purpose of identifying the relevant contact person and managing operational communications related to the service, is retained for 30 days following the termination of the service, unless required by specific legal obligations or necessary to defend the Data Controller's rights in court.
- Data relating to the account and registration on the Ads Manager platform, where distinct from the contact details of the point of contact, are retained for the duration of the contractual relationship with the client and, thereafter, for the time necessary to fulfill applicable tax and accounting obligations (10 years, pursuant to Article 2220 of the Italian Civil Code).

6. Scope of Data Disclosure

To carry out the processing purposes described above, personal data may be disclosed to the following categories of recipients:

- IT and hosting service providers necessary for the operation of the aryel.io website and the Ads Manager platform;
- labor consultants, accountants, and other professionals responsible for administrative, tax, and accounting management;
- Public authorities and entities, in the cases provided for by law.

These parties may act as data processors, formally appointed pursuant to Article 28 of the Regulation, or as independent data controllers, within the limits and for the purposes communicated to data subjects through the respective privacy policies.

7. Rights of the Data Subject

The data subject may exercise the rights recognized by the Applicable Law at any time by contacting the Data Controller using the methods indicated in paragraph 2. In particular, the data subject has the right to:

- access their personal data and obtain information on the purposes and methods of processing;
- obtain the rectification of inaccurate data and the completion of incomplete data;
- obtain the erasure of their data, in the cases provided for by the Applicable Law;
- obtain restriction of processing, in the cases provided for by the Applicable Law;



- receive the data provided in a structured format, where the processing is based on consent or a contract and is carried out by automated means (right to data portability);
- object to the processing of their personal data for legitimate reasons;
- withdraw any consent previously given, without this affecting the lawfulness of the processing carried out prior to the withdrawal;
- file a complaint with the Italian Data Protection Authority (Piazza Venezia 11, 00187 Rome - www.garanteprivacy.it) if the data subject believes that the processing violates the Applicable Law.

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