

Privacy Policy

Business & Sustainability S.r.l. (VAT no. 03923880128), with its registered office in Varese, 21100, Piazza XXVI Maggio 9, represented by its legal representative pro tempore (hereinafter also referred to as the “Company” or “B&ST”), in its capacity as Data Controller, respects your privacy and is committed to protecting personal data.

This Privacy Policy (hereinafter, the “Policy”) explains the purposes, methods, and means by which personal data are collected, managed, and protected in connection with the services offered through the website <https://www.b-st.it> (hereinafter, the “Website”).

B&ST undertakes to process your data in accordance with EU Regulation 2016/679 on the protection of personal data, better known as the “GDPR”, and any other applicable data protection law. In particular, the processing of personal data by our Company will be based on the principles of lawfulness, fairness, transparency, confidentiality, integrity, and limitation of purpose and storage.

1. Purpose of the Policy

This Policy is issued pursuant to Articles 13 and 14 of the GDPR and aims to provide information on how B&ST processes your personal data collected through the use of the Website, including any data that the User provides in order to stay informed of updates (e.g., by subscribing to the newsletter), to interact with our support service, or to request information and/or quotations (e.g., through online forms). It is the User’s responsibility to read this Policy together with any other Privacy Policies that we may provide from time to time to supplement, update, or elaborate on information relating to the collection and processing of personal data.

2. Data Controller

The Company acts as Data Controller and is responsible for your personal data. You may contact the Data Controller to obtain information on the processing of personal data or to exercise your rights under the GDPR by writing to the following e-mail address: info@b-st.it

This Policy also applies to processing activities related to the provision of services through our Software-as-a-Service (SaaS) platform called “SustainQuest” (hereinafter, the “Software”). In such processing activities, the privacy roles vary depending on the categories of data processed: (i) with regard to account, billing, security, and technical log data, B&ST acts as Data Controller; (ii) with regard to data and documents uploaded to the Software by B&ST’s Clients and their respective Users, such subjects act as Independent Data Controllers pursuant to Article 4(7) of the GDPR.

3. Roles and responsibilities

The Client using the Software determines the purposes and means of processing carried out through the platform in relation to the data subjects within its sphere (employees, collaborators, suppliers, customers, etc.) and, in its capacity as Independent Controller, is responsible for: (a) the legal basis of the processing; (b) providing information to data subjects; (c) enabling the

exercise of rights under Articles 15–22 GDPR; (d) defining data retention periods; and (e) ensuring the accuracy and lawfulness of the data uploaded.

With respect to such data, B&ST acts as Data Processor and processes the information on the legal basis of contract performance (Article 6(1)(b) GDPR), within the limits of the Controller’s instructions; B&ST does not determine the purposes or means of processing.

B&ST remains an Independent Controller for processing activities related to account and billing management, service security, support, and log/audit records, which are carried out pursuant to Article 6(1)(b) and (f) of the GDPR, and for compliance with legal obligations pursuant to Article 6(1)(c).

4. Categories of data collected

This section describes the categories of personal data processed by the Company. The purposes of processing are outlined in section 5 below. We collect information lawfully and fairly, through:

- the Website;
- social media (please refer to the respective Privacy Policys for detailed information);
- the Software;
- potential exchanges with our clients, prospects, and/or business partners.

When you visit our Website, your browser automatically transmits certain data, such as the date and time of your visit, the type and settings of your browser, your operating system, and your IP address. For further details on the processing of personal data collected through the Website, please also refer to the Cookie Policy available on the same Website.

Through our Website, we process the following categories of personal data in relation to the following data subjects:

Personal data provided by the User/Client
First and last name
Date and place of birth
E-mail address
Residential address
Telephone number
Personal identifiers of natural persons acting on behalf of a company
Tax Code and VAT number
Traffic and log data

5. Purposes of data processing

We limit the amount and nature of personal data collected to what is necessary for the purposes for which it is collected, as described in the table below. We restrict, protect, and monitor all our information resources against unauthorised access, damage, loss, or destruction, whether physical or electronic. We retain personal data only for as long as necessary, as detailed below, and to respond to your requests, within the maximum retention period allowed by law. If we keep your data for historical or statistical purposes, we ensure that such data will not be used further. To facilitate understanding, the table below sets out the categories of personal data processed, the purposes of processing, the lawful basis authorising each processing activity, and the respective retention period. Your personal data will be processed using IT, electronic, and manual tools, in compliance with confidentiality and security rules established by law.

Category of Data	Purpose of Processing	Lawful Basis	Retention Period
User contact data	<ul style="list-style-type: none">• Marketing, request for commercial information• Support• Newsletter	Consent	Until consent is withdrawn or for a longer period in compliance with a legal obligation or an order from an authority
Client/User contact details and of persons acting on their behalf	<ul style="list-style-type: none">• Newsletter• Contract performance• Contact at Client/User's request	Contract	For the duration of the contractual relationship and for 2 years following its termination, unless a longer period is required by law
Client/User personal details and of persons acting on their behalf	<ul style="list-style-type: none">• Support• Marketing, request for commercial information• Contract performance	Contract	For the duration of the contractual relationship and for 2 years following its termination, unless a longer period is required by law
Personal details, personal data relating to the User's activities within the Software, personal data contained in identification and/or corporate documents	<ul style="list-style-type: none">• Contract performance• Generation of analytical results	Contract	For the duration of the contractual relationship and for 2 years following its termination, unless a longer period is required by law

Category of Data	Purpose of Processing	Lawful Basis	Retention Period
	<ul style="list-style-type: none"> Support 		
Invitation and user management data: e-mail addresses of invitees, user-tenant/company associations, assigned roles and permissions, invitation status/acceptance, operation timestamps. Audit and technical logs: access and authentication events, role/permission changes, user creation/removal, insertions/modifications/deletions of company data (metadata), session identifiers, IP address, user agent.	<ul style="list-style-type: none"> Contract performance Legitimate interest - security/anti-abuse 	Contract	For the duration of the contractual relationship and for 2 years following its termination, unless a longer period is required by law

6. Third-party links

Our Website and/or Software may include links to third-party websites. By clicking on such links or enabling such connections, third parties may process your personal data; therefore, you are also invited to refer to the Privacy Policies of those websites. B&ST has no control over the content or policies of such websites, nor over their practices relating to the protection of personal data that they may collect. Consequently, the Company disclaims all responsibility for the processing of your personal data carried out by such third parties.

7. Sharing of personal data

Within the Company, your data may be processed by collaborators, employees, and/or service providers in the performance of specific processing activities. B&ST personnel do not intentionally access the content of personal data contained in identification and/or corporate documents except for the purpose of providing the Client/User with the requested support. In addition, we may share personal data with the categories of recipients listed below, for the specified purposes, in compliance with the principles of data minimisation and purpose limitation, and by implementing appropriate security measures. Such entities shall have access to personal data only to the extent strictly necessary to ensure the proper use of the Software under the Software-as-a-Service model and may not use them for any other purposes. Third parties will in any case be required to process personal data in accordance with the applicable law. We will adopt all reasonable contractual, legal, technical, and organisational measures to ensure that personal data are processed with an adequate level of protection, not lower than that with which we protect our own data.

In particular, for the provision of our services, the categories of entities to which we may disclose data, within the scope and limits of the pursued purposes, include:

- Entities operating within the European Union, acting in full autonomy as independent Data Controllers or, where appointed by B&ST, as Data Processors, for ancillary purposes related to the activities, services, and use of the Software. Examples include IT support and consultancy providers, data storage services, and/or other companies or consultants engaged to provide specific services. In any event, such entities are bound by contractual obligations of confidentiality and limitations on processing activities under applicable law, with a strict prohibition on transferring or disclosing personal data to third parties.
- Entities authorised to access such information pursuant to provisions of European Union law or the national law of the Member State to which the Data Controller is subject.

Where B&ST acts as Data Processor, the Company may engage sub-processors (e.g., cloud service providers, mailing services, application monitoring) appointed pursuant to Article 28 of the GDPR. Data are processed primarily within the European Economic Area (EEA).

8. Data retention period

We retain personal data only for as long as necessary to fulfil the purposes for which they were collected, including the purpose of complying with any legal, accounting, or reporting obligations. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure, the purposes for which we process the data and whether those purposes can be achieved through other means, and any applicable legal requirements. Further details regarding retention periods can be found in the table provided in section 5, *"Purposes of Data Processing"*. Without prejudice to the provisions of the above section, invitation/role/permission logs and technical security logs are retained for the time strictly necessary to ensure service integrity, traceability, and security - generally until termination of the contract and for 24 months thereafter, subject to longer periods where strictly necessary to: (i) establish, exercise, or defend a legal claim; or (ii) comply with legitimate requests from Authorities.

9. Cookie Management

Browsing our Website may involve the use of cookies, which are tools that collect information about the user and their browsing activities. A cookie is a small data file that our Website stores on your device and accesses upon each visit in order to better understand how you use the Website. Such information enables us to offer you content and features consistent with your expressed preferences. For further details, please refer to our Cookie Policy.

10. Automated decision-making

B&ST uses algorithms to generate analytical reports and aggregated data. In any case, the Software does **not** subject the data subject (natural person) to any decision based solely on automated processing, including profiling, that produces legal effects concerning them or significantly affects them in a similar way, pursuant to Article 22 of the GDPR.

11. Protection of personal data

We limit the quantity of data collected to what is necessary for the stated purpose and retain it only for as long as required to achieve that purpose. We restrict, protect, and monitor all our information resources to prevent unauthorised access, damage, loss, or destruction, whether physical or electronic. As regards the personal data of third parties contained in corporate documents and/or

recorded within the Software by the Client/User, which are processed by B&ST due to the Client/User's use of the Service, the latter remains the Independent Data Controller for such data. The Client/User defines the purposes and means of processing and undertakes to process the personal data within the limits permitted by the applicable law, assuming full responsibility and fully indemnifying B&ST.

12. Rights of the data subject

We kindly remind you that you may exercise your rights concerning personal data at any time, as set out in Regulation (EU) 679/2016, including the right to:

- withdraw consent previously given at any time; however, withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal, pursuant to Article 7(3) GDPR;
- request from the Data Controller access to your personal data, pursuant to Article 15 GDPR;
- obtain from the Data Controller the rectification and completion of your personal data deemed inaccurate, including by providing a supplementary statement, pursuant to Article 16 GDPR;
- obtain from the Data Controller the erasure of your personal data where one of the grounds set out in Article 17 GDPR applies;
- obtain from the Data Controller the restriction of processing where one or more of the circumstances under Article 18 GDPR apply;
- receive from the Data Controller your personal data in a structured, commonly used, and machine-readable format, and transmit those data to another Data Controller without hindrance, pursuant to Article 20 GDPR;
- object at any time, on grounds relating to your particular situation, to the processing of your personal data carried out pursuant to Article 6(1)(e) or (f), including profiling based on those provisions, pursuant to Article 21 GDPR;
- not be subject to decisions based solely on automated processing, including profiling, that produce legal effects concerning you or similarly significantly affect you, unless you have previously and explicitly consented, pursuant to Article 22 GDPR. By way of example, this category includes any form of automated processing of personal data aimed at analysing or predicting aspects concerning consumption and purchasing choices, financial situation, interests, reliability, or behaviour;
- lodge a complaint with the supervisory authority for data protection if you believe that the processing of your personal data infringes the GDPR. The complaint may be lodged in the Member State where the data subject habitually resides or works, or in the place where the alleged infringement occurred, pursuant to Article 77 GDPR.

To exercise any of your rights, the Data Subject may contact the Data Controller by sending an e-mail to info@b-st.it

For data processed by the Client/User as Independent Data Controllers within the application, requests from data subjects (access, rectification, erasure, restriction, objection, portability) must

be addressed directly to the relevant Controller. Where B&ST acts as Data Processor, it shall cooperate to fulfil such requests without undue delay and within the limits of the instructions received.

13. Updates and contacts

The introduction of new sector regulations and the continuous review and updating of the services offered may entail the need to amend the methods of processing personal data. It is therefore possible that this Privacy Policy may be modified over time. You are therefore invited to periodically review this page and check the revision date indicated below. The new, amended, or updated version shall apply as from the date of revision.

This Privacy Policy has been drafted in Italian. In the event of any conflict between the Italian version and a translated version, the Italian version shall prevail.

To exercise your rights or to request information on how we process your personal data, you may contact us by e-mail at info@b-st.it.

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