

INFORMATION ON THE PROCESSING OF PERSONAL DATA THROUGH A TELEPHONE DIGITAL ASSISTANT PURSUANT TO ART. 13 OF EU REGULATION 679/2016

The Data Controller informs users and customers about the processing of personal data carried out through Luminal Park's telephone digital assistant.

The digital assistant may assist in managing calls received at Luminal Park's company telephone number. During office hours, the digital assistant routes the call to an available human operator. Outside office hours, or where no operator is available, the digital assistant may collect the user's request so that it can subsequently be handled and the user contacted if necessary.

In such cases, the conversation with the digital assistant may be recorded, transcribed, summarized and, where necessary, translated into Italian. The information collected may be entered into the company's support systems, including Zendesk, and into the company CRM, including by creating or updating the contact record where it does not already exist.

This privacy notice concerns processing carried out through the telephone digital assistant. Any additional processing relating to conversations with human operators will, if implemented, be governed by a specific privacy notice and carried out in accordance with applicable law.

Data Subjects: customers, prospective customers, individual contacts at customer companies and users who contact Luminal Park by telephone.

Data Controller: LUMINAL PARK S.R.L., with registered office in Verona (VR), Via Goffredo Mameli 11, VAT No. 04199420235, contact email: privacy@luminalpark.com

Data protection officer: pursuant to Art. 37 GDPR, the Data Controller has appointed a DPO who can be contacted at the following email address: dpo@pga.it

Purposes of processing: your data will be processed for the following purposes on the basis of the relevant legal bases:

No.	Purpose	Legal basis
1	Management and routing of calls received at the company telephone number, using the digital assistant, in order to connect the user with an available operator during office hours.	Processing is necessary for the purposes of the legitimate interests pursued by the Data Controller in ensuring the proper organization of customer service and the efficient management of requests received. Art. 6(1)(f) GDPR.
2	Collection of the user's request outside office hours or where no operator is available, to enable subsequent handling and, where appropriate, follow-up contact.	Processing is necessary in order to take steps at the request of the data subject prior to entering into a contract and/or for the performance of a contract or management of the support relationship. Art. 6(1)(b) GDPR.
3	Recording of the conversation with the digital assistant, transcription, summary and any translation, in order to	Processing is necessary for the purposes of the legitimate interests pursued by the Data Controller in ensuring the proper management of

No.	Purpose	Legal basis
	accurately document the request and enable company personnel to handle it.	requests received, service continuity, internal organization and protection in the event of disputes. Art. 6(1)(f) GDPR.
4	Creation of a ticket in the support systems, including the Zendesk platform, and recording of the request in the company's systems.	Processing is necessary in order to take steps at the request of the data subject prior to entering into a contract and/or for the performance of a contract or management of the support relationship. Art. 6(1)(b) GDPR.
5	Creation or updating of the contact record in the company CRM, where the contact does not already exist, in order to manage the request and subsequent follow-up.	Processing is necessary in order to take steps at the request of the data subject prior to entering into a contract and/or for the purposes of the legitimate interests pursued by the Data Controller in properly managing relationships with customers and prospective customers. Art. 6(1)(b) and (f) GDPR.
6	Security, maintenance and proper functioning of IT systems, and verification of access to data processed through the digital assistant.	Processing is necessary for the purposes of the legitimate interests pursued by the Data Controller in ensuring the security of systems and the protection of personal data. Art. 6(1)(f) GDPR; Art. 32 GDPR.
7	Follow-up contact with the user via WhatsApp Business, where the user requests or confirms this channel during the conversation with the digital assistant, for the purpose of handling the request made by telephone. WhatsApp Business will be used exclusively to handle the user's request and provide clarifications, support or information connected with that request. It will not be used to send promotional or marketing communications without the data subject's separate and specific consent.	Processing is necessary in order to take steps at the request of the data subject prior to entering into a contract and/or for managing the support request or the customer relationship. Art. 6(1)(b) GDPR.

The digital assistant is not used to make decisions based solely on automated processing that produce legal effects concerning the data subject or similarly significantly affect them. The data are not used for automated commercial profiling.

Types of personal data processed

For the purposes stated above, it is necessary to process:

- common identification and contact data, such as first name, surname, company, telephone number and email address, where provided by the data subject;

- data relating to the request made by the user, including data relating to products, orders, projects, quotations, support or other needs communicated during the call;
- the user's voice, where the conversation with the digital assistant is recorded;
- the transcript, summary and any translation of the conversation;
- technical data and call metadata, such as date, time, duration, calling number, call outcome, ticket identifier and information necessary for the technical management of the service;
- data entered or updated in the company CRM and support systems.

The Data Controller does not ask users to disclose data belonging to special categories pursuant to Art. 9 GDPR, such as, by way of example, health data, religious beliefs, political opinions or other sensitive data. Users are therefore invited not to disclose such information during conversations with the digital assistant unless it is strictly necessary for the specific request.

Methods of processing

The personal data collected will mainly be processed using:

- corporate IT systems;
- telephony and digital assistance systems;
- artificial intelligence tools used to transcribe, summarize and, where necessary, translate the request;
- customer support platforms, including Zendesk;
- the company CRM;
- cloud services and storage systems, including Amazon S3 buckets;
- appropriate technical and organizational security measures pursuant to Art. 32 GDPR.

Personal data will be processed by personnel authorized pursuant to Art. 29 GDPR and by external parties appointed, where necessary, as Data Processors pursuant to Art. 28 GDPR.

Data recipients

Personal data may be disclosed to:

- providers of telephony and digital switchboard services;
- providers of artificial intelligence systems used for transcription, summarization and any translation, including OpenAI or entities that integrate such technology;
- providers of cloud and data storage services, including Amazon AWS/S3;
- customer support platforms, including Zendesk;
- providers of the company CRM;
- parties providing maintenance, management and security services for IT systems;
- public authorities or parties to whom disclosure is required by law.

The above parties have been or will be expressly appointed as Data Processors pursuant to Art. 28 GDPR where they process personal data on behalf of the Data Controller, or will process the data as independent data controllers in the cases provided for by applicable law.

Personal data disclosure: personal data will not be disclosed to the public in any way.

Transfers of personal data to third countries: personal data are processed within the European Union or, where necessary in relation to the technology providers used, may be transferred to third countries in compliance with the safeguards set out in Art. 44 et seq. GDPR, including any adequacy decisions, standard contractual clauses or additional safeguards required by applicable law.

Data retention period: the retention of personal data is determined according to the following principles:

Purpose	Data Retention
Management and routing of calls during office hours	The technical data strictly necessary to route the call will be retained for the time required for the technical management of the service and system security.
Conversations with the digital assistant outside office hours or where no operator is available	The audio recording of the conversation, the transcript, the summary and any translation will be retained for a maximum period of 6 months, unless deleted earlier when no longer necessary or retained for a longer period to comply with legal obligations, manage complaints or disputes, or protect the Data Controller's rights.
Tickets created in the support systems	The data contained in the ticket will be retained for the time necessary to manage the request and, in any event, in accordance with the company policies applicable to customer support systems.
Data entered or updated in the CRM	The data will be retained for the time necessary to manage the request or the commercial or contractual relationship, and in accordance with the applicable customer privacy notice.
Technical logs and system security	The data will be retained for the period strictly necessary to ensure the security, maintenance and proper functioning of the systems.

**Provision of personal data**

Providing the data requested through the digital assistant is necessary to enable Luminal Park to manage the user's request and make any follow-up contact. Without the necessary data, Luminal Park may be unable to properly handle the request or provide the requested service.

Rights of the data subjects: pursuant to Articles 15-22 GDPR, the data subject may request from the Data Controller the exercise of the rights of access, rectification, erasure, restriction of processing, data portability and objection to processing and, where applicable, withdrawal of consent.

To exercise their rights, data subjects may contact the Data Controller at privacy@luminalpark.com or the DPO at dpo@pga.it.

For more information on data subjects' rights, please visit www.garanteprivacy.it.

Pursuant to Art. 77 GDPR, the data subject may submit a report or lodge a complaint with the Italian Data Protection Authority, located at Piazza Venezia 11, 00186 Rome, email: urp@gpdp.it.