



Courtesy translation – This privacy notice is drafted in Italian and translated for non-Italian-speaking users.

Original version in Italian: blueeagle.technology/privacy/newsletter/

Notice on the processing of personal data

Newsletters of the Blue Eagle Technology websites

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Distribution

Name	Role	Organisation
Sole Director	Review and approval	Blue Eagle Technology S.r.l.
DPO	Review	Blue Eagle Technology S.r.l.

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This notice (art. 13 GDPR) explains how we process the data of those who subscribe to the newsletters of the Blue Eagle Technology websites listed in section 2. The text is the same for all the websites, but each website has its own list of subscribers, managed separately.

1. Who processes your data

Controller: Blue Eagle Technology S.r.l., Via Micanzi 9, 25133 Brescia (BS), VAT number IT 03345770980, which publishes the websites and sends the newsletters indicated in section 2, also under its own brands Eagle Networks and ARXDOME.

Privacy contact: privacy@blueeagle.it

Data protection officer (DPO) of Blue Eagle Technology S.r.l.:
email dpo@eu-gdpr.it

2. Which newsletters it applies to

The notice applies to the newsletters you subscribe to from the following websites. The list is updated when a newsletter is added or discontinued. The newsletters are free of charge: subscribing involves no costs or purchase obligations.

Website	Brand	Newsletter	Subscription and management
blueeagle.technology	Blue Eagle Technology	Coming soon	—
eagle.network	Eagle Networks	Coming soon	—
arxdome.com	ARXDOME	ARX News (weekly) Allerte critiche Novità ARXDOME	newsletter.arxdome.com and forms on arxdome.com

Each website has its own list of subscribers, separate from the others.

- The data you leave on a website are used **only** to send you the newsletters you have chosen on that website.
- They are not used for the newsletters of the other websites, nor merged with the lists of the other websites, nor shared with anyone.
- If you want to receive the newsletters of more than one website, you subscribe on each of them; if you unsubscribe from one website, your subscriptions on the others remain as they are.

3. What data we process

- **Contact data:** first name, last name and email address.
- **Optional data:** company and role, only if you provide them.
- **Preferences:** the newsletters you choose and the language of the emails.

- **Proof of consent:** date and time of the subscription and of the confirmation, version of the consent text you accepted, page from which you subscribed.
- **Technical delivery data:** outcome of the sendings (delivered, bounced, reported as spam).

We do not ask you for special categories of data (art. 9 GDPR, for example health data) or for data relating to criminal convictions and offences.

4. Why we process them and on what legal basis

For each purpose, the legal basis:

- **Sending you the newsletters you have chosen** — Your consent (art. 6.1.a GDPR and art. 130 of the Codice, the Italian Personal Data Protection Code), collected with double confirmation: after the form you receive an email with a link to click, and without confirmation you receive nothing.
- **Understanding, in aggregate form, who reads us, in order to choose the topics** (only company and role, if you provide them) — Your consent (art. 6.1.a GDPR), given by filling in the optional fields.
- **Demonstrating that we have collected your consent** — The controller's obligation to be able to demonstrate consent (arts. 5.2 and 7.1 GDPR) and legitimate interest in protecting itself in the event of disputes (art. 6.1.f GDPR).
- **Keeping the list accurate and secure:** checking that the domain of the address exists and receives mail, handling bounces and spam reports, suspending addresses that do not work — Legitimate interest in not sending emails to non-existent addresses or to those who did not ask for them (art. 6.1.f GDPR) and obligation to adopt appropriate security measures (art. 32 GDPR).

You can withdraw your consent at any time, free of charge, with the “Unsubscribe” link in every email or from your personal page; withdrawal does not make unlawful what was done before it (art. 7.3 GDPR).

The data are **not** used for profiling, are not passed on or sold to third parties and serve no purpose other than sending the newsletter you requested. There are no decisions based solely on automated processing (art. 22 GDPR).

5. Provision of data

Subscribing is voluntary and free of charge. First name, last name and email address are necessary to subscribe: without them we cannot send you the newsletter. Company and role are optional: if you do not provide them, you still receive the newsletter.

6. Who can see your data

- **Blue Eagle Technology staff** authorised to manage the newsletters, only as far as necessary for the sendings, support and maintenance, under an obligation of confidentiality.
- **Providers acting as processors** (art. 28 GDPR): the data are hosted on servers in data centres in the European Union and managed by Blue Eagle Technology's technicians; to send the emails

we use a specialised external provider.

- **Authorities**, only where provided for by law.

The data are not disclosed to other parties for their own purposes and are not shared between the websites listed in section 2.

7. Transfers outside the European Union

The data centres that host our websites and the subscribers' data are located in the European Union.

Only the sending of the emails (the newsletters and service messages, such as the subscription confirmation) may involve a transfer of data to the United States. For this service Blue Eagle Technology uses processors (art. 28 GDPR) which may process in the United States the email address, name, content of the emails and technical data relating to the delivery of the messages. All the processors that process data in the United States are certified under the EU-U.S. Data Privacy Framework, and the transfer is based on the related adequacy decision of the European Commission (Decisione di esecuzione (UE) 2023/1795 – Commission Implementing Decision (EU) 2023/1795 – of 10 July 2023, art. 45 GDPR). Should that decision cease to apply, the transfer will take place on the basis of the standard contractual clauses adopted by the European Commission (art. 46 GDPR), already signed between Blue Eagle Technology and each processor, solely for the period necessary to migrate the service to another provider. You can obtain a copy by writing to the controller (privacy@blueeagle.it) or to the DPO (dpo@eu-gdpr.it).

The updated list of processors is kept at the offices of Blue Eagle Technology and can be consulted on request to the controller or the DPO.

To limit the data transferred, the emails do not contain plain-text credentials, attachments with personal data or lists of people.

8. How long we keep the data

Data	Retention
Active subscriptions	As long as you remain subscribed to the newsletter.
Data of those who unsubscribe	Deleted no later than 30 days after unsubscribing, except for the copies of the newsletters sent and the technical sending logs, which are kept for the periods indicated below.
Subscriptions never confirmed	Deleted after 4 days; the confirmation link is valid for no more than 4 days.
Addresses suspended because of permanent non-delivery (hard bounce) or a spam report	Kept, limited to the email address and the reason for the suspension, until you ask for them to be deleted: they serve to avoid sending you unwanted emails.
Addresses suspended because of temporary non-delivery (soft bounce)	Deleted after 45 days.
Deletion requested from your personal page	Immediate.

Data	Retention
Service event log	After deletion only anonymous events remain (for example "subscription confirmed" with the date), with no link whatsoever to the person.
Copies of the newsletters sent	45 days from sending.
Technical sending logs at the email provider	45 days from sending.
Backup copies	Daily backup, kept on a rotating basis for 10 days.

9. How we protect the data

Encrypted connection (HTTPS) for forms and personal pages; double confirmation of the subscription; check that the domain of the address exists; separate lists for each website; access to management restricted to authorised staff; personal page reachable only through the personal link sent by email; emails without unnecessary data and without tracking tools; daily backups.

10. Your rights

You can request at any time:

- access to your data and a copy of them (art. 15);
- rectification of inaccurate data (art. 16);
- erasure (art. 17);
- restriction of processing (art. 18);
- portability of the data you provided (art. 20);
- to object to processing based on legitimate interest (art. 21);
- to withdraw your consent at any time (art. 7.3).

How: from your personal page (link in every email, no password needed) you can change newsletters, language and data, download your data to a file or delete them. Every email contains the **"Unsubscribe"** link and allows you to unsubscribe with one click from your email program. You can also write to the controller, at the contact details in section 1, or to the DPO (dpo@eu-gdpr.it). We will reply within one month of receipt, a period that may be extended by two months in complex cases (art. 12.3 GDPR).

You also have the right to lodge a **complaint with the Garante per la protezione dei dati personali** (Italian Data Protection Authority, www.garanteprivacy.it) or with the supervisory authority of the EU State in which you live or work (art. 77 GDPR).

11. Cookies and tracking

- **Subscription and management pages:** they do not use profiling cookies or tracking tools. For the rest of each website, its cookie policy applies.

- **Emails:** the newsletters do not contain tracking pixels and the links are not tracked: we do not record whether and when you open an email or which links you click (Guidelines of the Garante on the use of tracking pixels in emails, provvedimento n. 284 del 17 aprile 2026 – decision no. 284 of 17 April 2026).

Should we wish in the future to measure opens or clicks, we will first ask you for a specific and separate consent, which can be withdrawn at any time, and we will update this notice.

12. Changes

This notice may be updated. New versions are published on blueeagle.technology and linked from every subscription form; for each subscriber we record the version of the text accepted. When you confirm your subscription we send you an email with the link to download, in PDF, the version of the notice you accepted. If the changes concern the purposes of the processing, we will ask you for a new consent. Date of last update: 1 October 2026.