

Nebula Privacy Policy

Last updated: 19/03/2025

Welcome to the *Nebula* Privacy Policy, a platform developed by **AltermAInd** for monitoring compliance with contractual SLAs between customers and Microsoft cloud providers.

Protecting your personal data is our priority.

1. Data Controller

The data controller is:

AltermAInd

For any requests regarding data protection, you can contact our DPO:

privacy@fibofin.it

2. Data Collected

Nebula collects and processes the following data:

- **User identification data:** first name, last name, email address.
- **Company data:** company name, VAT number.
- **Log and diagnostic data:** information about monitored resources to verify SLA compliance.

Nebula does not process special categories of personal data as defined under Article 9 of the GDPR, including but not limited to data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, health data, or data concerning a natural person's sex life or sexual orientation. Furthermore, *Nebula* does not process personal data relating to criminal convictions and offenses as defined under Article 10 of the GDPR.

3. Purpose of Data Processing

The collected data is used for:

- Monitoring compliance with contractual SLAs.
- Sending notifications to users regarding the status of monitored resources.
- Generating reports for audits and regulatory compliance
- Complying with legal obligations and orders from authorities.

- Establishing, exercising, or defending legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

4. Legal Basis for Processing

Data processing is based on the **execution of a contract** between the user and *AltermAlnd*. Without this data, the use of *Nebula* would not be possible. Data processing may also be based on the necessity to comply with a legal obligation or to defend a right (both in and out of court).

5. Data Sharing

The data collected by *Nebula* **is not shared with third parties**.

6. Recipients

The data may be communicated in full compliance with the provisions of the GDPR to the following subjects: to public authorities, where required by law or at their request; to external companies that the Controller uses to carry out related or instrumental activities (hosting of the Site, administrative/accounting management of activities related to *Nebula*); to external consultants. The Controller shall appoint the third parties who process data in its name and on its behalf as data processors pursuant to Article 28 GDPR.

7. Location of the processing.

AltermAlnd prioritizes the processing of personal data within the European Union. In cases of data transfer outside the EU territory, AltermAlnd ensures compliance with the standard contractual clauses adopted by the European Commission and other relevant guidelines from authorities.

8. Data Security

AltermAlnd implements safeguard measures and diligently work toward preventing unauthorized access to personal information, and the loss, destruction, alteration, leakage, etc. of such information.

To ensure data security, *Nebula* implements the following measures:

- **Limited access** to authorized users only.
- **Security audits** conducted periodically to prevent unauthorized access or breaches.

- Andrebbe integrato ulteriormente

9. Data Retention

Data is retained for a minimum period of **one year** per customer to ensure traceability of SLA monitoring information, without prejudice to longer retention periods where required for compliance with legal obligations or for the establishment, exercise, or defense of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

At the end of the retention period, data will be deleted, anonymised or aggregated in such a way that users cannot be identified.

10. User Rights

In accordance with the **General Data Protection Regulation (GDPR)**, you have the right to:

- **Access** your personal data.
- **Request the deletion** of your personal data.
- **Exercise the right to be forgotten**, through a dedicated procedure.
- Request data portability.
- Lodge a complaint with a supervisory authority.

To exercise these rights, you can contact our DPO at privacy@fibofin.it

11. Changes to the Privacy Policy

We reserve the right to update this Privacy Policy at any time. We will notify you of any substantial changes via our website or by email.