

Document	XL CAD - Privacy policy
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1. Data Controller

The Data Controller is: Mattia Riviera, contactable at the following e-mail address: legal@xlcad.com (hereinafter, the "Controller").

The Controller processes personal data in compliance with Regulation (EU) 2016/679 (General Data Protection Regulation - GDPR).

Should the activity be carried out in the future through a company, the Data Controller will be identified as such and this policy will be updated accordingly.

2. Types of Data Collected

The Controller collects and processes different types of personal data depending on the services used by the user.

a. Data collected during software download

In order to download the software, the user must provide their e-mail address.

Providing the e-mail address is necessary to complete the download of the software.

The user may also optionally provide consent to receive informational and promotional communications (newsletter) at the provided e-mail address.

b. Data collected during software activation

In order to activate the software, the user must provide:

- i. Their e-mail address.
- ii. The device name (PC name).
- iii. The operating system user name.

Such data are used exclusively for technical purposes and for managing the software license.

The user may also optionally provide consent to receive informational and promotional communications at the provided e-mail address.

c. Software usage data (basic telemetry)

During the use of the software, data relating to the types of features used are collected, without in any way collecting information on data entered or processed by the user in user documents.

Such data are processed exclusively for technical analysis and for improving the performance and functionality of the software.

d. "Insider" program and advanced diagnostic data

During software activation, the user may voluntarily choose to join the "Insider" program.

In this case, subject to explicit consent, additional data relating to the functioning of the software may be collected, including:

- i. Features that generated malfunctions.
- ii. Parameters associated with the operations that generated malfunctions.

Such information may include data entered by the user during the use of the software.

The Controller adopts technical and organizational measures aimed at limiting the collection of such data to what is strictly necessary and reducing their degree of identifiability.

Data collected within the "Insider" program are used exclusively for technical analysis, software improvement and issue resolution.

Participation in the program is optional and may be revoked at any time.

e. No data collection via the website

The website does not provide for account creation nor the collection of additional personal data beyond those expressly provided by the user for software download and optional newsletter subscription.

f. Browsing data

The IT systems and software procedures used to operate the website may acquire, during their normal operation, certain technical data whose transmission is implicit in the use of Internet communication protocols.

Such data are not collected to be associated with identified users, but could, by their very nature, allow users to be identified through processing and association with data held by third parties.

The website uses or may use cookies and similar technologies, as described in the Cookie Policy.

3. Purpose of Processing and Legal Basis

Personal data are processed for the following purposes:

a. Software download

User data (e-mail address) are processed to enable software download.

Legal basis: performance of pre-contractual measures taken at the request of the data subject.

b. Software activation and license management

Data collected during activation (e-mail address, device name, operating system user name) are processed to enable activation, management, and proper functioning of the software license.

Legal basis: performance of a contract to which the data subject is a party.

c. Technical analysis and software improvement (basic telemetry)

Data relating to software usage are processed to analyze usage patterns and improve software performance and functionality.

Such data do not include information on content entered or processed by the user.

Legal basis: legitimate interest of the Controller in continuously improving the product.

d. "Insider" program and advanced diagnostics

Data collected within the "Insider" program, including parameters and technical information related to malfunctions, are processed for the purpose of:

- i. Analyzing errors and anomalies.
- ii. Improving the software.
- iii. Testing new features.

Legal basis: explicit consent of the data subject.

Consent may be withdrawn at any time.

e. Informational and promotional communications (newsletter)

The user's e-mail address may be used to send informational and promotional communications related to the software.

Legal basis: consent of the data subject.

Consent may be withdrawn at any time.

f. Compliance with legal obligations

Personal data may be processed to comply with obligations set forth by laws, regulations, or EU legislation.

Legal basis: compliance with a legal obligation to which the Controller is subject.

4. Processing Methods and Data Retention

a. Processing methods

Personal data are processed using IT and telematic tools, with logic strictly related to the stated purposes and in compliance with the principles of lawfulness, fairness, transparency, and data minimization.

The Controller adopts appropriate technical and organizational measures to ensure data security, preventing unauthorized access, disclosure, alteration, or destruction.

Processing is carried out exclusively by authorized personnel or by service providers appointed as data processors.

b. Data retention

Personal data are retained for the time strictly necessary to achieve the purposes for which they were collected.

In particular:

- i. Data provided for software download and activation are retained for the entire duration of software use and thereafter for the time necessary for technical and administrative management.
- ii. Data processed for marketing purposes (newsletter) are retained until consent is withdrawn.
- iii. Data collected within the "Insider" program are retained for the time necessary for technical analysis and troubleshooting.
- iv. Data processed to comply with legal obligations are retained for the period required by applicable law.

At the end of the retention period, data will be deleted or anonymized, in accordance with applicable legal obligations.

5. Data Disclosure and Recipients

Personal data are not disclosed (i.e., not made available to an indefinite number of subjects).

Data may be communicated to third parties, where necessary appointed as data processors pursuant to Article 28 of Regulation (EU) 2016/679, for purposes strictly related to service provision.

In particular, data may be communicated to:

- a. Hosting and IT infrastructure service providers used for the operation of the website and related services.
- b. Cloud service providers and technological platforms used for software operation.
- c. Providers of electronic communication services (e.g., e-mail delivery).
- d. Technical or professional consultants, within the limits necessary for their activities.

Such subjects process personal data as data processors or, where applicable, as independent data controllers.

An updated list of data processors may be requested by contacting the Controller.

Personal data may be transferred to countries outside the European Economic Area, including through third-party services.

In such cases, the Controller ensures that transfers are carried out in compliance with applicable GDPR provisions, adopting appropriate safeguards such as adequacy decisions or Standard Contractual Clauses (SCC).

6. Data Subject Rights

The user, as data subject, has the right to exercise at any time the rights provided for by Articles 15 et seq. of Regulation (EU) 2016/679.

In particular, the user has the right to:

- a. Obtain confirmation as to whether personal data concerning them exist and access such data.
- b. Request rectification of inaccurate data or completion of incomplete data.
- c. Request erasure of personal data (right to be forgotten), where applicable.
- d. Request restriction of processing, where applicable.
- e. Object to processing, including processing based on the Controller's legitimate interest.
- f. Receive personal data in a structured, commonly used, and machine-readable format and transmit them to another controller, where applicable.
- g. Withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

The Controller reserves the right to suspend, in whole or in part, the provision of services (including the Software) if the data subject objects to the processing of personal data that the Controller deems necessary for the provision of such services.

7. Changes to this Privacy Policy

The Controller reserves the right to modify, update, or supplement this policy at any time, also in consideration of regulatory changes or evolution of the services provided.

Changes will be published on the website and, where appropriate, communicated to users through available channels.

Users are therefore invited to periodically review the website to check for updates to this policy.