

DATA PROCESSING NOTICE

EU REGULATION 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data

Namirial S.p.A. processes data in compliance with the provisions set forth in European Regulation 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter "EU Regulation 2016/679").

Pursuant to Article 13 of the aforementioned Regulations below is information regarding the identification of the data controller and the data processor on the processing of personal data with regard to contracts and the provision of services.

The data controller is NAMIRIAL S.p.A. with registered office in Senigallia (AN), ZIP code 60019, Via Caduti sul Lavoro n. 4.

Type of data processed

As part of the Service that Namirial will provide to you, we will process the following categories of personal data:

- Personal information (name, surname, tax code, sex, date of birth, place of birth, nationality);
- Identity document;
- Address;
- Contact details (telephone number and e-mail address);
- Biometric data (physical, physiological or behavioral characteristics collected through video recognition or graphometric signature).

Purpose of processing

We will process your personal data for the following purposes:

- a) Conclusion of the contract and use of services: the legal basis for this purpose is Article 6(1) b of the GDPR - Contract;
- b) Verification of the applicant's identity by video recognition: the legal basis for this purpose is Art. 9(2) a - Consent;
- c) Management and response to requests for technical assistance, including online procedures: the legal basis for this purpose is Art. 6(1) b of the GDPR - Contract;
- d) Compliance with legal, national or EU regulatory obligations: the legal basis for this purpose is Art. 6(1) c of the GDPR - Legal obligation;
- e) Sending information with informational content: the legal basis for this purpose is Art. 6(1) f of the GDPR - Legitimate interest of the Data Controller;
- f) Statistical, business and market analyses, carried out in an absolutely anonymous and aggregated form: the legal basis for this purpose is Art. 6(1) f of the GDPR - Legitimate interest of the Data Controller;
- g) Legal protection of Namirial rights: the legal basis for this purpose is Art. 6(1) f of the GDPR - Legitimate interest of the Data Controller;
- h) Prevention of fraudulent activities by performing a check on the reliability of the contact data provided by the data subject: the legal basis for this purpose is Article 6(1) b of the GDPR - Contract and the Art. 6(1) f of the GDPR - Legitimate Interest of the Data Controller.

Provision of data

The provisions of the data referred to at points a), b), d), g) and h) are mandatory to allow for the conclusion of the contract or for the provision of the requested services. The provision of the data referred to at the other points is optional: you can at any time ask the Data Controller to interrupt the processing activities without this entailing any consequences in the context of the services provided to you.

Methods of processing and access to data

Namirial S.p.A. processes personal data in accordance with the Principles of the Regulation by virtue of its legitimate interests regarding the type of activity carried out and the need to fulfil current contracts or pre-contractual measures requested by the data subjects.

The data collected through the signing of standard contracts in analog format are processed both in paper form and with computer and telematic tools and may be processed in aggregate form for statistical findings and verification of the quality standards of support and maintenance services, excluding in this case the processing of identification data.

Data collected through the completion of online forms are processed electronically and may be subject to automated processing through management information systems.

The data are accessible exclusively to persons in charge, adequately trained and informed about their duties and the activities allowed to them on the data collected, who operate on behalf of Namirial and who receive instructions and tasks from the Data Processor, via appointment letter.

The data controller will process data for the above purposes by pursuing its legitimate interests that do not override the interests or rights and freedoms of the data subject.

Scope of disclosure and dissemination of data

Please be informed that the data relating to the contract and the service activity may be disclosed to third parties appointed as external data processors (the complete list is available at the Data Controller), commercial consultants for administrative and accounting purposes, as well as to legal consultants for the management of possible disputes.

We also inform you that the data may also be disclosed to police or judicial authorities for the purpose of detecting or suppressing offenses committed by users of telematic services, where necessary.

We would also like to inform you that data may also be processed by third parties acting as Local Registration Authority or Registration Authority Operator or by individuals with a paper and/or digital management and archiving function, formally appointed by Namirial as external data processors/sub-processors.

Retention and deletion of personal data

Namirial S.p.A. will retain the data of data subjects in a form that allows them to be identified for a period of time not exceeding the achievement of the purpose for which the data were collected.

Data related to the Certificate and/or Digital Identity, even when collected through the audio-video recording system, will be kept for 20 (twenty) years from the termination of the contract or the expiration or revocation of the Certificate or Digital Identity, in accordance with the provisions of Legislative Decree 82/2005 and subsequent amendments (Digital Administration Code) and of the Prime Ministerial Decree of 24 October 2014 and subsequent amendments.

The user's browsing and access data related to the Digital Identity will be retained for a period of 2 (two) years starting from the performance of such operations.

Data related to the PEC (Certified Electronic Mail) box, even when collected through the audio-video recording system, will be kept for 10 (ten) years from the termination of the contract or from the last activity on the PEC box, whichever is later.

Data strictly necessary for accounting and financial reporting purposes, the purpose for which they were collected having ceased to exist, will be retained for a period of ten (10) years as required by relevant regulations.

The service logs relating to the Certificates and/or the Digital Identity and/or the PEC box will be kept for a period equal to 6 (six) months in order to ensure the correct identification of service flows. After these periods have elapsed, Namirial S.p.A. will delete the data of the data subjects.

The data subject has the right to request, at any time, the modification of the arrangements governed by this policy through the exercise of the rights set forth in the following paragraph.

The rights of the data subject

The data subject may exercise the rights referred to in art. 15 (Right of access by the data subject), 16 (Right to rectification), 17 (Right to erasure), 18 (Right to restriction of processing), 19 (Right to receive the notification from the controller regarding rectification or erasure of personal data or restriction of processing), 20 (Right to data portability), 21 (Right to object) and 22 (Right to reject the automated processing) of EU Regulation 2016/679.

We inform you that the exercise of the rights of the data subject referred to in the aforementioned articles, such as the right to erasure or object, meets the limits imposed by the applicable regulations (Prime Ministerial Decree of 22 February 2016 Art. 56, 57 and Prime Ministerial Decree of 24 October 2014, Art. 7) with regard to the obligations to store personal data.

To exercise the rights under Articles 15 to 22 of EU Regulation 2016/679, the data subject should address a written request to:

Namirial S.p.A., Via Caduti sul Lavoro No. 4 - 60019 Senigallia (AN)
dpo@namirial.com - dpo.namirial@sicurezzaapostale.it



Namirial S.p.A.

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