

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 "Regulation").

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, nationality);
- Contact details (telephone number and e-mail address).
- Address;
- Invoicing data (VAT number)

Purpose of processing

We will process your personal data for the following purposes:

- Creation and use of the user profile: the legal basis for this purpose is Article 6(1) b of the GDPR - Contract;
- 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;
- Compliance with legal, national or EU regulatory obligations: the legal basis for this purpose is Art. 6(1) c of the GDPR - Legal obligation;
- 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;
- 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;
- 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;

Provision of data

The provision of the data referred to at points a), c) and f) is 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



Namirial S.p.A.

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Codice destinatario T04ZHR3 | Capitale sociale € 8.238.145,00 i.v.

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.

Place of data processing

Personal data are processed at the Data Controller's offices and on the servers hosting the service. Personal data are stored on servers located in the territory of the European Union and will not under any circumstances be transferred outside it. The Data Controller of the processing guarantees that, in the event of the use of cloud providers established outside the European Economic Area, the processing of personal data by such recipients takes place in compliance with the principles of the GDPR. Transfers are carried out by means of appropriate safeguards, such as adequacy decisions, standard contractual clauses approved by the European Commission or other safeguards provided for in the GDPR.

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.

The user profile will be deactivated and all personal data will be deleted in the event of non-use of the services offered for a period of 18 (eighteen) months.

Data strictly necessary for tax and accounting purposes, once the purpose for which they were collected no longer applies, will be retained for a period of 10 (ten) years as required by the relevant regulations.

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 Reg. EU 2016/679.

Please note that the exercise of the data subject's rights referred to in the above articles, such as the right to erasure or objection, meets the limits imposed by the regulations applicable (Prime Minister's Decree of 22 February 2016, Articles 56, 57, and Prime Minister's Decree of 24 October 2014, Article 7) to the services with regard to personal data retention obligations.

To exercise your rights under Articles 15 to 22 of Reg. EU 2016/679 the data subject should address a written request addressed to:

Namirial S.p.A., Via Caduti sul Lavoro No. 4 - 60019 Senigallia (AN)

dpo@namirial.com - dpo.namirial@sicurezzapostale.it

The data subject also has the right to file a complaint with the Data Protection Authority.



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