

DATA PROTECTION 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 of 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 (hereinafter referred to as "Reg. EU 2016/679").

Pursuant to Articles 13 and 14 of the aforementioned regulation, the following information is provided regarding the identification data of the data controller and data protection officer in relation to the processing of personal data relating to contracts and services provision.

Data Controller is NAMIRIAL S.p.a. with registered office in Senigallia (AN), ZIP code 60019, Via Caduti sul Lavoro n. 4.

Data Protection Officer (DPO) is Serena Donegani.

Type of processed data

The data provided and processed by Namirial SpA are common, personal and sensitive data.

Purpose of processing

We inform you that the personal data, provided directly by the interested party and/or collected by fill-in forms on paper and/or available on Namirial SpA websites, are processed for the purpose of concluding the contract to which the interested subject is a party, and also to perform the contractual benefits and to provide the services requested by the Customer or available on the portals managed by Namirial SpA or by intermediaries appointed by the same, including the supply activation through the one-time password sent via SMS or email or mobile apps, as well as for administrative and accounting purposes related to service contracts.*

We also inform you that Namirial adopted a video-identification system, used for the interested party identification and registration of the consent purposes, in order to the correct execution of the applications of the supply of goods or remote services, without the necessary personal presence.**

Data provision

The provision of data in the first field indicated above (*) is mandatory for the conclusion of the contract or for the provision of the requested services. The provision of the data in the last field indicated above (**) is mandatory for the conclusion of the contract or for the provision of the requested services only when video-identification system is used.

Conditions for data processing and access

Namirial S.p.A. process personal data in accordance with Article 6 co. 1 lett. A), b), f) of EU Reg. 2016/679 by virtue of its legitimate interests related to the type of activity carried out and the need to implement the existing contracts or pre-contractual measures requested by the data subject.

The data collected by signing standard contracts in paper form are processed both in the aforementioned format and with IT and telematic tools and may be processed in aggregate form for statistical purposes and to verify the quality standards of assistance and maintenance services, in this case excluding the processing of identification data.

The data collected by filling in online forms are processed electronically and through information and management systems.

The data shall be accessible only by duly trained officers and informed about their duties and the activities permitted to them on the data collected, acting on behalf of Namirial and receiving instructions and tasks given by the data controller by means of a letter of appointment.

The data controller will process the data for the purposes indicated above, pursuing his legitimate interests that do not prevail over the interests or rights and freedoms of the data subject.

Scope of communication and possible dissemination of data

We inform you that the data relating to the contract and service activities can be communicated to commercial consultants for administrative and accounting purposes and to lawyers for possible management of litigation.

We also inform you that the data may also be communicated to police or judicial authorities for the purpose of ascertaining or prosecuting crimes committed by users of telematic services, where necessary.

Furthermore, we inform you that the data can be also processed by third parties as a Local Registration Authority or Registration Authority Operator or by subjects with role of paper and/or digital management and archiving, formally appointed by Namirial as external processors/subprocessors.

Personal data retention and erasure

Namirial SpA 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 purposes for which the data have been collected.

The data pertaining to the certificates, even when collected through the video-identification system, will therefore be retained until the existence of the contractual relationship and in any case for 20 years from the exercise of the last activity on the certificate itself according to art.28, co.4bis of Italian Digital Administration Code (Italian Legislative Decree 82/2005) and art. 7, co.8 of DPCM 24/10/2014.

User data about login and navigation related to the digital identity will be retained for 2 years from the execution of these operations.

The data pertaining to the certified electronic mail box, even when collected through the video-identification system, will be retained for 10 years from the termination of the contract or until the exercise of the last activity on the certified electronic mail box.

The data strictly necessary for fiscal and accounting compliance, which no longer serves the purpose for which they have been collected, will be retained for a period of 10 years as required by the relevant regulations.

Service's logs related to the certificates and/or digital identity and/or certified electronic mail will be retained for 6 months for the purpose of the proper identification of the services flows.

The interested party has the right to request, at any time, the modification of the structures regulated by this paragraph through the exercise of the rights referred to in the following paragraph.

Rights of 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 (Notification obligation regarding rectification or erasure of personal data or restriction of processing), 20 (Right to data portability), 21 (Right to object) e 22 (Automated individual decision-making, including profiling) of Reg. EU 2016/679.

We inform you that the exercise of the data subject's rights referred to in these articles, such as the right of erasure or object, meets the limits imposed by the reference regulations (Prime Ministerial Decree of 22 February 2016, Art. 56,57) with regard to the obligations to retain personal data.

In order to exercise the rights provided for in articles 15 to 22 of EU Reg. 2016/679, the interested party must address a specific written request addressed to:

**Namirial S.p.A., Via Caduti sul Lavoro n. 4 – 60019 Senigallia (AN)
s.donegani.dpo@namirial.com - dpo.namirial@sicurezza postale.it**