

CONTACTS: NOTICE ON THE PROTECTION OF PERSONAL DATA PURSUANT  
TO ARTICLE 13 OF REGULATION (EU) 2016/679

Pursuant to Article 13 of Regulation (EU) 2016/679 the company SAPITECH SRL, based in Via della CHIMICA N. 4/G - Alessandria, as Data Controller, informs users of the site [www.sapitech.it](http://www.sapitech.it) requesting information about the following:

PROCESSED DATA

Personal identification and computer data provided by the data subject through the form on the Controller's website.

PURPOSES	LEGAL BASE OF THE PROCESSING
To respond to the data subject's request and for related and instrumental activities	Voluntary provision of data
To assert or defend a right in or out of court.	Legitimate interest

NATURE OF PROVIDING DATA

The provision of personal data by users is optional. However, failure to provide such data will make it impossible to proceed with the requests forwarded or that the user intends to forward.

PROCESSING METHODS

Data processing is carried out through computer procedures or, in any case, through telematic means and paper supports by people authorised by the Controller, specifically trained to guarantee the respect and protection of the personal data processed.

The Controller shall ensure that all appropriate security measures are taken as required by legislation for its retention.

PERIOD OF DATA RETENTION

The data will be processed for the period of time strictly necessary to achieve the purposes for which it was collected (fulfilment of requests received).

In the absence of an active response from the data subject, the data will be retained for 12 months.

COMMUNICATION AND DISSEMINATION - RECIPIENTS

Personal data will be processed by persons expressly and specifically designated by the Controller as processors or appointees.

The data may also be processed by third parties (outsourcers) that we use to provide services related to the purpose pursued, which our organisation assesses from time to time whether to appoint data processors to ensure greater protection.

In all cases, these parties will process the data in accordance with the instructions received from the Controller, according to operational profiles assigned to them in relation to the functions performed, limited to what is necessary and instrumental to the performance of specific operations within the scope of the services requested, and exclusively for the fulfilment of the purposes indicated in this notice.

The list of Data Processors, which is constantly updated, can be requested by sending a communication in the manner indicated in the following point concerning the rights of the data subject. The data may also be communicated to public and/or private third parties and competent authorities that can access the data by law.

The data shall not be disseminated, sold or exchanged with third parties without the express consent of the data subject.

#### DATA TRANSFER OUTSIDE THE EU

The collected data is not subject to transfer beyond European borders.

#### RIGHTS OF THE DATA SUBJECTS

Data subjects, to whom the personal data refers, are entitled to exercise their rights as shown below at any time:

<u>Art. 7 - Right to withdraw consent</u>	The data subject shall have the right to withdraw his or her consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. Prior to giving consent, the data subject shall be informed thereof. It shall be as easy to withdraw as to give consent.
<u>Art. 15 - Right of access</u>	The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and to the information regarding processing.
<u>Art. 16 - Right to rectification</u>	The data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Considering the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.
<u>Art. 17 - Right to erasure (right to be forgotten)</u>	The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay.
<u>Art. 18 - Right to the restriction of processing</u>	The data subject shall have the right to obtain from the controller restriction of processing where one of the following applies:

	<p>a) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;</p> <p>b) the processing is unlawful, and the data subject opposes the erasure of the personal data and requests the restriction of its use instead;</p> <p>c) the controller no longer needs the personal data for the purposes of the processing, but it is required by the data subject to establish, exercise or defend a right in court;</p> <p>d) the data subject has objected to processing pursuant to Article 21, paragraph 1, pending the verification whether the legitimate grounds of the controller override those of the data subject.</p>
<u>Art. 21 - Right to object</u>	The data subject shall have the right to object at any time for reasons relating to his or her particular situation, to the processing of personal data concerning him or her pursuant to Article 6, paragraph 1, letters e) or (f), including profiling based on those provisions.
<u>Art. 22 - Right to not be subject to automated decision-making, including profiling</u>	The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.
<u>Art. 77 – Right to lodge a complaint</u>	The data subject who considers that the processing of his or her data is in breach of the applicable privacy legislation has the right to lodge a complaint with the supervisory authority.

#### DATA CONTROLLER

The controller is SAPITECH SRL, a company based in Via della CHIMICA N. 4/G - Alessandria.

An updated list of the appointed data processors is available at the Controller's registered office.

For any communication relative to the data subject exercising his/her rights, it is possible to contact:

info@sapitech.it

#### CHANGES AND UPDATES

This notice may be subject to changes and additions, including as a result of regulatory changes. We will constantly update this notice.

Date of last approval, 21.01.2019

The Controller

SAPITECH SRL

(Original signature)