

COOKIES: 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 visitors of the site www.sapitech.it of the type of cookies they use and the purposes pursued with the information acquired, also providing indications to proceed to the selection/deselection of individual cookies.

WHAT COOKIES ARE AND WHAT PURPOSES THEY CAN BE USED FOR

A "cookie" is a small text file created by some websites on the user's computer when the user accesses a particular site, for the purpose of storing and transferring information. Cookies are sent by a web server (which is the computer on which the visited website is running) to the user's browser (Internet Explorer, Mozilla Firefox, Google Chrome, etc.) and stored on the user's computer; they are then sent back to the website on subsequent visits.

Some operations could not be carried out without the use of cookies, which are therefore technically necessary in some cases. In other cases, the site uses cookies to aid and facilitate navigation by the user or to allow the user to use specifically requested services.

Cookies can remain in the system for long periods of time and can also contain a unique identification code. This allows the sites that use them to keep track of the user's navigation within the site itself, for statistical or advertising purposes, to create a personalised profile of the user based on the pages he or she has visited and then show and/or send him or her targeted advertising.

Below are the specifications of the cookies used:

COOKIE	NOME	FINALITA'	TIPOLOGIA	DURATA
Google Analytics	__gid	technical	Third party	1 year
Google Analytics	__ga	technical	Third party	3 years
Sapitech.it	PHPSESSID	technical	First party	Session

THIRD PARTY COOKIES

Third-party cookies, i.e., created by a website other than the one the user is currently visiting, are operational on this website.

For further information, please refer to the cookie policy of such third parties in the manner explained in more detail later in this document.

Given the objective complexity of identifying technologies based on cookies and their close integration with the functioning of applications and the web, the user is asked to contact the Controller if he/she wishes to receive any further information on the use of cookies and their use - for

example by third parties - carried out through this site.

In particular, users are informed that the web analysis service that issues cookies used by the Controller is "Google Analytics".

To consult Google's privacy policy regarding the Google Analytics service, as well as to express your consent to the use of the aforementioned cookies, please refer to the following website <http://www.google.com/intl/it/analytics/privacyoverview.html>

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.

COOKIE DESELECTION AND ACTIVATION

Most browsers (Internet Explorer, Firefox, Chrome, etc.) are configured to accept cookies. However, cookies stored on the hard disk of your device can be deleted and it is also possible to disable cookies by following the instructions provided by the main browsers at the following links:

Chrome

Firefox

Internet Explorer

COMMUNICATION AND DISSEMINATION – RECIPIENTS

The collected data may be communicated to:

Third parties appointed as external data processors (e.g., IT assistance, web-marketing, telemarketing companies, etc.)

Public and/or private third parties and competent authorities that can access the data by law; the data will not be disseminated, sold or exchanged with third parties without the express consent of the data subject.

DATA TRANSFER ABROAD TO COUNTRIES OUTSIDE THE EUROPEAN ECONOMIC AREA

We inform you that the Controller does not currently transfer your personal data to a third country or to an international organisation.

Should you decide to transfer your personal data to a third country or to an international organisation, such transfer will only take place in the presence of an adequacy decision of the European Commission or, in the case of transfers referred to in Article 46 or 47, or in Article 49, second paragraph, only if there is express reference to appropriate or adequate guarantees and the means to obtain a copy of such data, or the place where it was made available.

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
<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: 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; b) the processing is unlawful, and the data subject opposes the erasure of the personal data and requests the restriction of its use instead; 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; 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.
<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.
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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, 29 March 2019

The controller
SAPITECH SRL
(Original signature)