

## **PRIVACY POLICY (extended)**

pursuant to Article 13 of the GDPR

### **Website, apps and portals**

#### **Why this document is important**

1.0

This document is of interest to you because it informs you how and why we process your personal data (🔥)

##### !! Important

When there is this symbol (🔥), you will find the definition of the word above in the Essential Glossary at the bottom!

This notice only concerns processing carried out for the purposes specified below (→ 🗄️ **Why we process your data**).

This information does not replace any specific information that will be given to you when you use other services of the Controller.

This document may be updated over time: check back regularly!

#### **Data controller** (🔥)

1.0

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#### **What are your rights**

1.0

In the cases provided for by law, you have the right to **access your data**, to ask for them to be **corrected and deleted**; you also have the right to **object to the processing** of your data or to **ask for the processing to be restricted**; and you have the right to the **portability** of your data. Furthermore, you have the right to **revoke the consent** given to the Controller at **any time**, without affecting the lawfulness of the processing based on the consent given before revocation.

In any case, if you have any doubts or requests, please contact us (     ), we will be happy to hear from you!

##### !! Important

You as the Data Subject (🔥) may **exercise your rights** and **withdraw your consent** by notifying us at the contact details indicated.

In addition, you can lodge a **complaint with the Data Protection Authority** or **go to court** if you believe that the processing of your data is against the law.

#### **Why we may process your data (legal bases)**


1.0


Any processing of personal data must have an appropriate legal basis.




##### !! Important

Treatment is lawful when:

 **contract**: necessary to perform a contract to which the data subject is a party or pre-contractual measures requested by the data subject

 **consent**: the data subject freely, specifically informed and unequivocally manifests his/her consent

 **legal obligation**: necessary to fulfil a legal obligation to which the Controller is subject



-  legitimate interest: necessary to pursue the legitimate interest of the Controller or of third parties
-  **protection of vital interests:** it is carried out to preserve serious and present dangers to the life of the data subject
-  **public interest:** necessary to perform a task in the public interest or for the exercise of public authority

## Why we process your data (purpose)

### Website, apps and portals

1.0

The Controller processes personal data in order to manage the <https://isig.it/it/> website and to enable navigation.

Legal basis:  contract |  legitimate interest



#### Important

**The provision of data for this purpose is indispensable:** if you do not provide it, we will not be able to provide the service or carry out the activity.

### Enquiries received by e-mail, contact form or other means

2.0

The Controller processes personal data in order to handle the requests it receives (by e-mail or via the other communication tools available, such as contact forms, instant chats or telephone calls), to respond to them and to improve the performance of the service.

Legal basis:  contract |  legitimate interest



#### Important

**Communication of data for this purpose is indispensable:** if you do not communicate your data to us, we will not be able to respond and follow up on your communication.

### CVs and job applications received via the website or other tools

2.0

The Data Controller processes personal data in order to manage the candidature of those who spontaneously propose themselves or even only send their curriculum vitae. These activities are preparatory to the establishment of an employment relationship, such as: research, selection, evaluation, contact with the candidate.

Legal basis:  contract |  legitimate interest


#### Important

**The provision of data for this purpose is indispensable:** if you do not provide us with your data, we will not be able to process your application.

### Profiling

2.0

The Data Controller processes personal data to track the user's surfing on the web in order to create profiles on tastes, habits, choices, etc. and then send advertising messages in line with the preferences already expressed online by the same user.

Legal basis:  consent



#### Important

**Consent is required for this purpose.** You may revoke your consent to data processing at any time by notifying us (opt-out). If you do not give your consent or if you subsequently revoke it, it will not be possible to carry out related activities and services.

### Tracking

2.0

The Data Controller processes browsing data to generate website / app / portal usage statistics in order to track and monitor user behaviour. The processing is also aimed at improving the service.

-  Examples of statistics generated by tracking treatment
  -  most visited pages

- use of services
- number of visitors per day
- number of visitors per time slot
- geographical area of origin of visitors

Legal basis: 🗳️ consent

### !! Important

This is the activity carried out through analytics cookies and in some cases the law provides that the user's consent is not required: more info in the [Cookie Statement](#) and [Cookie Policy](#)

## Legitimate interest 🗣️

1.0

Data subjects' data often also have to be processed in order to perform tasks that are related to the company's activities, but which are not mandatory by law or by virtue of the contract between the parties. This refers in particular to actions aimed at protecting the company's assets; verifying the quality of the work carried out by the company; verifying regulatory compliance; preventing fraud; direct marketing; transferring intra-group data for administrative purposes; recovering company debts; managing any litigation; exercising or defending rights in or before litigation.

Legal basis: 🗣️ legitimate interest

### !! Important

We never process your data on the basis of legitimate interest if this may affect your rights and freedoms!

## Obligations connected with what we do 🗣️

1.0

The Data Controller processes the data in order to perform activities connected with and instrumental to the performance of the contractual or pre-contractual relationship with third parties (e.g.: administrative, managerial, tax and accounting fulfilments; managing correspondence; making estimates; receiving orders; agreeing appointments; informing on the status of the activity; managing payments and invoicing).

Legal basis: 📄 contract | 🗣️ legal obligation | 🗣️ legitimate interest

### !! Important

**Communication of data for this purpose is indispensable.**

Processing for this purpose is carried out on the legal basis of legitimate interest and legal obligation, so your consent is not required.

## Respect the law 🗣️

1.0

The Data Controller also processes the personal data of Data Subjects in order to comply with legal obligations (such as administrative, accounting and tax obligations) to which it is subject, to protect its rights, and to enable the exercise of the functions of judicial authorities.

Legal basis: 🗣️ legal obligation

### !! Important

**Communication of data for this purpose is indispensable.**

Processing for this purpose is carried out on the legal basis of a legal obligation, so your consent is not required.

## What data do we process

1.0

### Personal Data

1.0

We process personal data, i.e., all information concerning an identified or identifiable natural person.

#### Important

Your data is valuable: do not communicate any data that is not necessary for the request you make to us and do not communicate any data of third parties unless you have their consent to do so!

We may also learn about your particular data that you voluntarily share with us (such as: health, genetic or biometric data; trade union membership; political opinions; philosophical or religious beliefs; ethnic or racial origin; sexual life and sexual orientation).

#### Examples of personal data we process:

- **browsing data:** IP addresses or domain names of the computers and terminals used by users; URI/URL notation addresses of the resources requested; time of the request, method used to submit the request to the server and size of the file obtained in response; numeric code indicating the status of the response given by the server (successful, error, etc.); parameters relating to the user's operating system and IT environment

### Navigation data

1.0

The computer systems and software procedures that make this site work, in the course of their normal operation, acquire certain personal data whose transmission is implicit in the use of Internet communication protocols.

These data are necessary to use the services of the site and are used anonymously to obtain statistical information on the use of the site and to check its correct functioning. Once processed, they are automatically deleted (except in the event of the need to ascertain criminal offences by the judicial authorities).

#### Examples of navigation data

- IP addresses or domain names of computers and terminals used by users
- addresses in URI/URL notation of requested resources
- time of the request, method used in submitting the request to the server and size of the file obtained in response
- numeric code indicating the status of the response given by the server (successful, error, etc.).
- parameters relating to the user's operating system and computer environment

### Web usage statistics

1.0

The Data Controller uses Google Analytics to generate statistics on the use of the website. All users' IP addresses are anonymised as soon as they are received from the network and before being stored or processed.

#### Examples of statistics generated by Google Analytics


- most visited pages
- use of services
- number of visitors per day
- number of visitors per time slot
- geographical area of origin of visitors

## Cookies and other tracking tools

1.0





Like almost all websites, this site also uses cookies and similar technologies.

Cookies are short strings of programming code that are installed on the device (computer, smartphone, tablet) of the user visiting the site to improve the browsing experience (during the site visit and subsequent visits) by automating certain procedures and to analyse how the site is used.

There are other technologies that collect information about your use of the services, behaviour and choices (e.g., tracking pixels): for the sake of simplicity, in this document we refer to cookies and these other technologies generically as  tracking tools.



For all specific information on the Tracking Tools on this site (what they are and how long they are stored) you can refer to the Cookie Policy.

These are technical and complex issues: if you have any doubts or queries, please contact us (     ), we will be happy to hear from you!

### **Technical Tracking Tools**

They are indispensable: they are needed for the proper functioning of the site.

Technical tracking tools are **session** tracking tools (necessary for normal use and navigation of the site) that are limited in duration to the work session, are not stored persistently on the user's computer and are deleted when the browser is closed.

Permanent technical tracking tools are **functionality cookies** (they store certain criteria selected by the user for subsequent visits) and **analytical cookies** (used to collect information, in aggregate and/or anonymous form, e.g., on how many users visit the site and their behaviour).

!! Important

They are not instrumental in the collection of personal data: the user's consent is not required for their installation.

### **Profiling Tracking Tools**

These are Tracking Tools used to trace the user's navigation on the web and create profiles on tastes, habits, choices, etc. in order to send advertising messages in line with the preferences already expressed online by the same user.

!! Important

These Tracking Tools are not used unless the user gives his or her consent. IT IS possible to change or revoke consent for each type of Tracking Tool at any time by using the dedicated tool on each page of the site.

### **Third-party tracking tools**

In addition to the Tracking Tools managed directly by the Owner (so-called "first party"), on this site there are also Tracking Tools that enable services provided by third parties (so-called "third party"). Unless otherwise indicated in this document, third-party Tracking Tools are managed independently by the respective third-party providers and the Owner has no access to the data collected with these tools.

Third Party Tracking Tools cannot be fully controlled by the Data Controller, so in order to know how the data collected and processed by the Third Party Tracking Tools on the site are managed, please refer to the disclosures made by the respective third party providers (see Cookie Policy).

In any case, if you have any doubts or requests, please contact us (     ), we will be happy to hear from you!

### **Social button**

The Controller's website may also use plugins and share buttons, which determine the presence of third-party tracking tools (so-called social network cookies) on the site.

Social networking cookies are used to check interest and/or share content from the Owner's site on social networks (e.g., Facebook). The information collected by these cookies may be passed on to third parties providing the service (e.g., Facebook).

The plugins and/or sharing buttons (so-called social buttons/widgets) appear as icons of social networks (e.g., Facebook) and other websites. By clicking on them, users who are browsing the Controller's site can interact directly with social networks and other websites: in this case the social network and other websites acquire data relating to the user's visit.

### **Storage duration and place of processing**

Duration and expiry of cookies and other similar Tracking Tools may vary depending on what is set by the Controller or each third-party provider: some expire at the end of the user's browsing session; others remain for a longer time.

For all specific information on the Tracking Tools on this site (what they are and how long they are stored) you can refer to the Cookie Policy.

## Where we get your data (sources)

1.0





We process data that you share with us directly (optionally, explicitly and voluntarily) using various channels (such as when you call or write to us, when you interact with our social profiles or when you use our website or app) and data that you have made public.


We also process data from public registers, lists and other public sources (e.g., balance sheets and other information from the Companies Register at the Chambers of Commerce; real estate deeds, registration of mortgages and other so-called prejudicial deeds; mass media and websites accessible to anyone).

## With whom we share your data

1.0

We share data with internal members of our organisation involved by reason of their assigned tasks and specifically entrusted with the processing (such as: employees and para-employees; interns, volunteers, temporary workers; partners, investors, directors; consultants and collaborators).

We may share data with third parties, outside our organisation, who help us to do our work and achieve the stated purposes. These parties operate as autonomous data controllers or as external data processors: contact us (   ) if you want to know who they are!

The data will not be disseminated ()

### Examples of data recipients



- Public Administrations, Public Bodies and subjects, including private ones, with functions of public relevance (such as Municipalities, ASL, INAIL, INPS, Guardia di Finanza, Supervisory Authorities, Revenue Agency, Judicial Authorities, etc.), to the extent that the prerequisites set out in the legislation are met
- social networks and other digital platforms (such as systems to manage video conferences or file exchange)
- parties managing the operation of the website, app and in general of the company's IT systems and telecommunications networks (e.g.: web agencies; providers of cookies and other tracking tools; newsletter providers; software houses; web providers; hosting providers)
- parties carrying out communication assistance and consultancy activities (e.g., market research aimed at detecting the degree of satisfaction with the quality of services and activities carried out, telemarketing, etc.)

## How long we keep your data

1.0

We retain data for the minimum time necessary to fulfil the purpose.

In particular:

- CVs and job applications received via the website or other tools  : we keep the data for a maximum of 1 year
- Profiling  : we retain data as long as the data subject agrees


Longer only if it serves to comply with legal obligations, fulfil orders given by public authorities, or pursue a legitimate interest (such as exercising or defending a right in litigation)

### Important

If your consent is required (e.g., for marketing purposes), we will process your data as long as you agree. Indeed, you can withdraw your consent to data processing at any time by notifying us (**opt-out**), but in that case we may no longer be able to provide you with certain activities and/or services.

## How we process your data

1.0

We take the appropriate security measures to protect your data and carry out the processing () required by law: collection, registration, organisation, storage, consultation, processing, use, modification, selection, extraction, restriction, communication, deletion and destruction of data.

## Data transfer abroad

1.0

Data are not transferred to non-EU countries

## Essential glossary

1.0

- ▣ **Personal data:** any information relating to an identified or identifiable natural person)
- ▣ **Dissemination:** giving knowledge of the data to unspecified persons, in any form, including by making them available or consulting them. E.g.: publishing a photo online or on a social network
- ▣ **DPO:** Data Protection Officer, whose functions also include acting as intermediary between Data Controller and Data Subject)
- ▣ **Data subject:** natural person to whom the personal data refer)
- ▣ **Data controller:** who determines the purposes and means of processing)
- ▣ **Processing:** any operation or set of operations carried out with or without the help of automated processes and applied to personal data or sets of personal data)

## Notes

Done by Owner with  StudioFLEX - labour lawyers (  [www.studioflex.it](http://www.studioflex.it),  [gdpr@studioflex.it](mailto:gdpr@studioflex.it))