#### INFORMATION REGARDING THE PROCESSING OF PERSONAL DATA OF USERS AS PER ART. 13 OF REG. (EU) 2016/679 ("GDPR")

#### DATA CONTROLLER

The Data Controller of the process is: **S.A.C.B.O. S.p.A**., Address: Via Orio al Serio 49/51 – 24050 Grassobbio (BG) e-mail address: <u>privacy@sacbo.it</u>

## DATA PROTECTION OFFICER (DPO)

The Data Controller has appointed a Data Protection Officer (DPO):  $\ensuremath{\textbf{Partners4Innovation}}$  c/o SACBO S.p.A.,

e-mail address: dpo@sacbo.it

| ØDATAPROCESSINGPURPOSESPURPOSES   | LEGAL BASIS OF THE<br>PROCESSING                 | DATA RETENTION<br>PERIOD   |
|---|--|--|
| Allow the use of the services on the website  | Execution of a contract of which you are a party | Contractual duration and, after  |
| Fulfill obligations established by regulations<br>and by applicable national and<br>supranational legislation | Need to fulfill legal obligations                | termination, for the ordinary<br>prescription period of 10 years.<br>In the case of judicial litigation, for the<br>entire duration of the same, until the |
| If necessary, to ascertain, exercise or defend the rights of the Data Controller in court                     | Legitimate interest                              | end of the terms of enforceability of the appeals  |

Once the retention terms indicated above have elapsed, the Data will be destroyed, deleted or made anonymous, compatibly with the technical cancellation and backup procedures.

### PROVISION OF PERSONAL DATA

The provision of data is optional but necessary for the conclusion and continuation of the contract; the refusal to provide the aforementioned data does not allow, therefore, to use the services.

# 前前 AUTHORIZED SUBJECTS TO THE PROCESSING

Data may be processed by employees of the corporate functions responsible for the pursuit of the purposes, who have been authorized to process and who have been received adequate operating instructions.

# MMM DATA RECIPIENTS

The data may be processed by external parties operating as Data Controllers such as, by way of example, Supervisory and Control Authorities and Bodies and in general public or private subjects, entitled to request the data.

The data may also be processed, on behalf of the Company, by external parties designated as Data Controller, who are given adequate operating instructions. These subjects are essentially included in the following categories:

a. companies that offer e-mail sending services;

b. companies that offer website maintenance services.

## $\Lambda \Delta$ RIGHTS OF THE DATA SUBJECT AND RIGHT TO LODGE A COMPLAINT WITH A SUPERVISORY AUTHORITY

By contacting the Company by e-mail at <u>privacy@sacbo.it</u>, have the right to ask the Data Controller for access to data concerning themselves, the right to ask for erasure, rectification of inaccurate data, integration of incomplete data, restriction of the data processing as per art. 18 GDPR, as well as opposition to processing, for reasons related to their particular situation, in the hypothesis of legitimate interest of the Data Controller.

Furthermore, if the data processing is based on consent or on a contract, and it is processed with automated tools, data subjects shall have the right to receive their personal data in a structured, commonly used and machine-readable format, as well as, if technically possible, have the right to transmit those data to another Controller without hindrance from the Controller to which the personal data have been provided.

Data subjects have the right to lodge a complaint to the competent Supervisory Authority in the European State in which they reside habitually or work, or the State in which the alleged data breach has occurred.