







PRIVACY POLICY

	DATA CONTROLLER	S.A.C.B.O. S.p.A. Address: Via Orio al Serio 49/51, 24050 Grassobbio (BG) E-mail address privacy@sacbo.it ("Company").
	DATA PROTECTION OFFICER (DPO)	Partners4Innovation c/o S.A.C.B.O. S.p.A. Tel. no. 345 1682287, E-mail address dpo@sacbo.it

	<p style="text-align: center;">PERSONAL DATA PROCESSED</p> <p>1. Personal data processed for the purposes of Website operation IT systems and software procedures used to operate the Website acquire, during ordinary functioning, some personal data whose transmission is implicit in the use of Internet communication protocols. This information is not collected to be associated with identified data subjects, but could, by its very nature, through processing and association with data held by the Company or third parties, identify Website users. This category of data includes IP addresses or domain names of computers used to log on to the Website, URI (Uniform Resource Identifier) of resources required, the time of the request, the method used to submit the request to the server, the size of the file obtained in reply, the numerical code indicating the status of the response from the server (successful, error, etc..) and other parameters regarding the user's operating system and computer environment.</p> <p>2. Data directly provided by users The optional, express and voluntary sending of data as required by several sections of this Website are used in order to process the user's requests (by way of example, not limited to: when information or explanations are requested by phoning the numbers or by writing to the e-mail addresses indicated on the website). Any specific information, including summary information, is reported or displayed in the pages of the Website available for services on demand, in order to draw data subject's attention to the personal data processing.</p> <p>3. Cookie The Website makes use of cookies and similar technologies to ensure the proper functioning of procedures and to improve the experience of online applications. For the use of cookies, please read the complete information by clicking here:</p>
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 DATA PROCESSING PURPOSE	 LEGAL BASIS FOR DATA PROCESSING	 DATA RETENTION PERIOD
Website functioning Data collected during browsing are used in order to obtain anonymous statistical information on the use of the Website and to monitor its correct functioning.	Performance of the contract involving the data subject (Website use).	Throughout the session on the Website.
Contact purposes The data provided directly by the user shall be applied to the latter's requests (e.g. registration on the website or contact request).	Performance of the contract involving the data subject (Website use).	As per the information provided upon data collection
After the above retention terms have expired, the Data will be destroyed, erased or anonymized, consistent with the technical procedures of erasure and backup.		



DATA PROVISION COMPULSORINESS

Excluding the browsing data, required to implement IT protocols, the provision of personal data by users is free and optional. However, failing to provide such data will make it impossible to carry out the requests made or intended to be made by the user.

DATA RECIPIENTS

Personal data may be communicated to parties acting as data controllers (such as supervisory bodies and authorities and public organisations authorised to request data) or processed on behalf of the Company by parties appointed as data processors, who are provided with suitable operating instructions. These parties include the following categories:

- a) companies belonging to Company Group, working as data processors or for administrative and accounting purposes (e.g. purposes connected with internal, administrative, financial and accounting activities);
- b) natural and/or legal persons providing different services to the Company (e.g. suppliers of services for the management of the Website, such as system outsourcers, companies that provide connectivity services to the Internet, etc.). Such parties may also work as Data Processors;
- c) parties and/or public and private entities to which the data may be communicated for the purposes of fulfilling or enforcing the fulfillment of specific obligations required by laws, regulations and EU legislation. These subjects will operate as autonomous Data Controllers or Data Processors.



PARTIES AUTHORISED TO PROCESS DATA

The data will be processed by employees, collaborators of the Company or external parties, in their capacity as processors and officers, performing on behalf of the Company technical and organizational tasks on the Website.

PERSONAL DATA TRANSFERS OUTSIDE THE EU

The data may be transferred to non-EU Countries, in particular to:

- Extra UE Countries whose data protection level is deemed adequate by the European Commission in accordance with article 45 of the GDPR;
- Extra UE Countries other than those referred to in the preceding paragraph a), after signing Standard Contractual Clauses adopted/approved by the European Commission in accordance with article 46, 2, letters c) and d) of the GDPR.

A copy of the above mentioned safeguards can be obtained sending a specific request to the Data Controller, according to the modalities specified in the following paragraph “Data Subject’s rights – Complaint to the Supervisory Authority”.



DATA SUBJECTS' RIGHTS - COMPLAINT TO THE SUPERVISORY AUTHORITY

By contacting the Company via e-mail sent to privacy@sacbo.it, data subjects can require the controller to access personal data, as well as the correction or deletion of personal data, and are also entitled to restrict processing of such data in the cases set out in article 18 GDPR, and object the processing in case of legitimate interests of the controller.

Furthermore, in the case where processing is based on consent or a contract and carried out with automated tools, data subjects have the right to receive the personal data in a structured, commonly used and machine-readable format, and to transmit the data to another data controller without obstruction.

Data subjects have the right to lodge a complaint to the competent Supervisory Authority in the member state where they are resident or where they work, or the member state where the alleged breach took place