

DATA PROCESSING NOTICE

EU REGULATION 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data

Namirial S.p.A. processes data in compliance with the provisions set forth in European Regulation 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter "Regulation").

Pursuant to Article 13 of the aforementioned Regulations below is information regarding the identification of the data controller and the data processor on the processing of personal data with regard to contracts and the provision of services.

DATA CONTROLLER

The data controller is NAMIRIAL S.p.A. with registered office in Senigallia (AN), ZIP code 60019, Via Caduti sul Lavoro n. 4. The Data Protection Officer (DPO) can be reached at the following e-mail address: dpo@namirial.com - (PEC) dpo.namirial@sicurezzapostale.it

Pursuant to Regulation (EU) 2016/679 (hereinafter referred to as the "Regulation"), this page describes how Namirial processes the personal data of users consulting the Namirial websites.

TYPE OF DATA PROCESSED

As part of the activities carried out by the user on the indicated websites, Namirial may process, depending on the purposes, the following categories of personal data:

- Personal information (name, surname, social security number, gender, date of birth, place of birth, nationality);
- Copy of your ID;
- Address;
- Contact details (telephone number and e-mail address).
- Invoicing data (VAT number, recipient code)

Methods of processing and access to data

Namirial S.p.A. processes personal data in accordance with the Principles of the Regulation by virtue of its legitimate interests regarding the type of activity carried out and the need to fulfill current contracts or pre-contractual measures requested by the data subjects.

The processing is carried out using automated and/or manual computer and telematic tools suitable to guarantee the security measures suitable to prevent access, disclosure, loss, incorrect, illegal or unauthorized use of the data.

Data are processed for the time necessary to perform the service requested by the User, or required by the purposes described in this document, and the User can always request the interruption of the Processing or the deletion of the data.

The data are accessible exclusively to persons in charge, adequately trained and informed about their duties and the activities allowed to them on the data collected, who operate on behalf of Namirial and who receive instructions and tasks from the Data Processor, via appointment letter.

Place of data processing

Personal data are processed at the Data Controller's offices and on the servers hosting the service. Personal data are stored on servers located in the territory of the European Union and will not under any circumstances be transferred outside it. The Data Controller of the processing guarantees that, in the event of the use of cloud providers established outside the European Economic Area, the processing of personal data by such recipients takes place in compliance with the principles of the GDPR. Transfers are carried out by means of appropriate safeguards, such as adequacy decisions, standard contractual clauses approved by the European Commission or other safeguards provided for in the GDPR.



Namirial S.p.A.

Via Caduti sul Lavoro n. 4, 60019 Senigallia (An) - Italia | Tel. +39 071 63494
www.namirial.com | amm.namirial@sicurezzapostale.it | P.IVA IT02046570426
C.F. e iscriz. al Reg. Impr. Ancona N. 02046570426 | REA N. AN - 157295
Codice destinatario T04ZHR3 | Capitale sociale € 8.238.145,00 i.v.

Purpose of processing

We will process your personal data for the following purposes:

- a) Conclusion of contract or execution of pre-contractual measures: the legal basis for this purpose is Article 6(1) b of the GDPR - Contract;
- b) Management and response to requests for technical assistance, including online procedures: the legal basis for this purpose is Art. 6(1) b of the GDPR - Contract;
- c) Compliance with legal, national or EU regulatory obligations: the legal basis for this purpose is Art. 6(1) c of the GDPR - Legal obligation;
- d) Sending information with informational content: the legal basis for this purpose is Art. 6(1) f of the GDPR - Legitimate interest of the Data Controller;
- e) Legal protection of Namirial rights: the legal basis for this purpose is Art. 6(1) f of the GDPR - Legitimate interest of the Data Controller;

Provision of data

The provision of the data referred to at points a), c) and e) is mandatory to allow for the conclusion of the contract or for the provision of the requested services.

The provision of the data referred to at the other points is optional: you can at any time ask the Data Controller to interrupt the processing activities without this entailing any consequences in the context of the services provided to you.

Scope of disclosure and dissemination of data

The data of clients and customers may be communicated to public administrations or public service providers when the submission of applications for participation in procedures for the selection of a contractor, for the purpose of awarding contracts or concessions for the provision of goods or services, in accordance with the provisions of the regulations on public procurement, for purposes of technical qualification.

Please note that data related to the contract and service activity may be disclosed to third parties appointed as external data processors (the full list is available from the Data Controller), business consultants for administrative and accounting purposes, as well as to legal advisors for possible litigation management.

The data may also be communicated to police or judicial authorities for purposes of investigating or prosecution of crimes committed by users of telematic services, where necessary. We also inform you that the data may also be processed by third parties (such as companies controlled by and/or connected to Namirial S.p.A.) formally appointed by Namirial as managers or sub

external data processors.

The data, with the exclusion of those falling into particular categories of personal data, may be communicated to those (private or public administration), even outside the European Union, in its legitimate interest and taking advantage of a right expressly attributed to him by the specific regulations in force on the subject, requests an ascertainment of the identity of the owner of the service provided by Namirial S.p.A. for investigative purposes or otherwise for the protection of its own legitimate interest.

The data are not subject to dissemination, except for data from companies and corporations for commercial reference purposes.

The rights of the data subject

The User may exercise all rights under Articles 15-21 of the GDPR at any time and without unjustified restriction, by contacting the Controller at the email address dpo@namirial.com. Requests are filed free of charge and processed by the Holder within 30 days.

In particular, the User may:

- Obtain confirmation that processing is taking place (Art.15);
- Obtain rectification of inaccurate or incomplete data (Art. 16);
- Obtain deletion of data without undue delay (Art. 17);



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- Restrict processing to only part of the personal data (Art. 18);
- Receive a copy of personal data held by the data controller in a commonly used, machine-readable format;
- Obtain unimpeded transfer to another Data Controller (Art. 20);
- Object at any time to the processing of personal data. (Art. 21);

With regard to the purposes of processing that are based on consent, revoke it at any time.

CHANGES TO THIS PRIVACY POLICY

The Data Controller reserves the right to amend and update the following Privacy Policy as a result of any new provision of law national or European data protection law.



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