

Intesi Group Spa

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Privacy Policy on personal data processing ex Reg. EU 2016/679 art. 13-14

Data subject: Certified e-mail customers.

Dear Customer,

Pursuant to art. 13 and 14 of Regulation EU 2016/679, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation), (hereinafter, 'GDPR'), we inform you that, as a Certified e-mail Provider, Intesi Group Spa SpA (with registered office in via Torino 48, 20123 Milan, Italy), will process personal data supplied by you or collected from third parties, in compliance with GDPR, with Legislative Decree 30th June 2003 nr. 196 (a.k.a. 'Code regarding personal data protection') as adapted to GDPR by Legislative Decree 10th August 2018 nr. 101, and with any other law provisions in force and/or that would be subsequently issued regarding personal data protection.

This processing will be based on principles of correctness, lawfulness and transparency.

Your personal data will be processed in compliance with the legal provisions of the aforementioned regulation and will be strictly inherent, complete and not excessive in relation to the purposes pursued.

Purpose and legal basis for processing.

Intesi group collects and stores Your personal data for the sole purpose of providing you with the Certified e-mail Service, in compliance with

- Presidential Decree of 11th February 2005 nr. 68 - Regulation containing provisions for the use of certified e-mail, pursuant to art.27 of the law of 16th January 2003 nr. 3
- Ministerial Decree of 2nd November 2005 - 'Technical rules for creation, transmission and validation, even time-validation, of certified e-mail';
- Legislative Decree 7th March 2005 nr. 82 - 'Code for Digital Administration'

Legal basis for personal data processing is

- Execution of a contract of which the Data Subject is a party or execution of pre-contractual measures adopted upon request of the same;
- Fulfillment of the aforementioned legal obligations, to which the Data Controller is subject.

Where necessary, Intesi Group reserves the right to process your personal data to assert and defend its rights in court. In this latter case, processing will be based on the lawfulness condition referred to in GDPR art. 6, paragraph 1, letter f).

- PEC service provisioning.

Processing procedures. Your personal data may be processed by the following ways: In order to allow you to join and use the Services, types of personal data collected are as follows:

- Name and surname
- Fiscal Code
- Phone number
- e-mail address
- Certified e-mail log
- Any other information necessary to establish the relationship and subsequently execute the contract.

Data processing methods. Your personal data can be processed in the following ways

- computer processing.

Processing of your personal data occurs in an automated and/or manual form with logic strictly related to the purposes indicated above and in compliance with the provisions of GDPR art. 32 regarding security measures.

In order to pursue the purposes described above, Intesi Group will communicate your personal data exclusively to its employees, similar staff, collaborators who will operate as authorized subjects and/or Data Processors, and, in particular, to the following categories of assigned resources

- Administration office;
- Customer Support.

- consultant and freelance professionals, also working as firms.

Personal data collected will not be disclosed to third parties and will not be communicated without your explicit consent, except for the necessary communications that may involve data transfer to public bodies, consultants or other subjects to fulfil legal obligations.

Your personal data are processed and stored on servers located within the European Union.

We inform you that, in compliance with the principles of lawfulness, purpose limitation and data minimization pursuant to GDPR art. 5, the retention period for your personal data is:

- 10 years from the conclusion of the last contract;
- established as a period of time not exceeding the purposes for which the data were collected and processed and complying with the compulsory times required by law.

Cookies management. If you have any doubts or concerns about the use of cookies, you can always intervene to prevent their setting and reading, for example by changing the privacy settings in your browser in order to block certain types of cookies.

Since each browser - and often different versions of the same browser - differ even significantly from each other, if you prefer to act independently through the preferences of your browser, in the guide of your browser you can find detailed information about the necessary procedure. For an overview of the modes of action for the most common browsers, please visit www.cookiepedia.co.uk.

Besides, advertising companies allow you to opt out of receiving targeted ads, if you wish. This does not prevent setting of cookies, but those companies stop to use and collect some data.

For more information and opt-out option, visit www.youronlinechoices.eu/.

The Data Controller, as defined by the Law, is Intesi Group Spa (Via Torino 48 , 20123 Milano (MI); VAT no.: 02780480964; contactable as follows: E-mail: privacy@intesigroup.com; Telephone: 026760641) in the person of its current legal representative.

Pursuant to GDPR art. 37, the Data Controller designated a Data Protection Officer ('DPO'), whom you can contact to exercise your rights as well as to receive any information about your rights.

The DPO's contact details are the following

- Jolanda Giacomello (Tax code: 10051140969; contactable as follows: E-mail: dpo@intesigroup.com).

Intesi Group reserves the right to modify and/or update this Privacy Policy, based also upon any legislative and regulatory changes of the applicable laws on personal data protection, as well as in the event of any intervention by the competent Authorities.

The updated version of this Privacy Policy will be available, and freely downloadable, at the following website:
https://www.intesigroup.com/it/privacy_policy/

For the personal data concerning you, you have the right to obtain from the Data Controller the erasure ('right to be forgotten'), limitation, update, rectification, portability, objection to the processing and, in general, you can exercise all the rights provided for in GDPR art. 15, 16, 17, 18, 19, 20, 21, 22. It should be noted that, as a Certified e-mail Provider, Intesi Group must keep track of the operations performed during the transmission phases of the certified e-mail message for 30 months, as required by the Presidential Decree 68 of 11th February 2005, therefore the Data Controller will not accept any requests for erasure before the natural expiration date.

Besides, the exercise of your rights as a Data Subject is charge-free, pursuant to GDPR art. 12.

Notwithstanding the aforementioned article, if your requests are manifestly unfounded or excessive, in particular due to their repetitive nature, the Data Controller may charge you a reasonable fee, taking into account any administrative costs incurred to provide you with the information or communication or to undertake the required action.

Regulation (EU) 2016/679: Articles 15, 16, 17, 18, 19, 20, 21, 22 - Data Subject's Rights

1. The Data Subject has the right to obtain a confirmation as to whether or not related personal data exist even if not recorded yet, to get them communicated in an intelligible format and to have the possibility to lodge a complaint with a Supervisory Authority.

2. The data subject has the right to obtain indication of:

- a. Origin of personal data;
- b. Purposes and methods of processing;
- c. Applied logic in case of processing performed by means of electronic tools;
- d. Identification details of the Data Controller, Data Processors and of the designated Representative, pursuant to art. 5, point 2;
- e. Subjects or subject categories to which personal data can be communicated or can become aware of as designated Representative in the Country territory, Data Processors or Authorized persons

3. The data subject has the right to obtain:

- a. Update, rectification or, when interested, data integration;
- b. Erasure, transformation in anonymous format or block of data processed in violation of the law, including those data for which retention is not necessary in relation to the purposes for which data were collected or processed afterwards;
- c. Attestation that operations as per letters a) and b), including their content, have been brought to knowledge of those to whom data have been communicated or disseminated, except for the case in which this fulfilment is impossible or implies use of means manifestly disproportionate to the protected right;
- d. Data portability.

4. The data subject has the right to object, in whole or in part, to:

- a. Processing of related personal data, even if relevant for the purposes of collection, for legitimate reasons;
- b. Processing of related personal data for the purpose of sending material for advertising or direct sales or for market research or commercial communication.