

Intesi Group Spa

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

Data subject: Certificated Customers of Qualified and Advanced Electronic Signature Service..

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 Trust Service Provider (hereinafter, 'QTSP'), Intesi Group 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.

Purposes and legal base of the processing:

Intesi group collects and stores Your personal data for the sole purpose of providing you with the Qualified Electronic Signature Service, in compliance with

- REGULATION (EU) Nr. 910/2014 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 23 July 2014, on electronic identification and trust services for electronic transactions in the internal market (hereinafter also 'eIDAS Reg.');
- Legislative Decree 7th March 2005 nr. 82 - 'Code for Digital Administration' (hereinafter, 'CDA').

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).

- In order to issue any certificate, it is mandatory to identify its owner. The procedure can take place by means of (a) a meeting with an identification operator (in person or by recording a video call) by acquiring a copy of the identity document of the subject; or, more quickly, (b) online authentication through a digital identity provider; or finally (c) a dedicated mobile App.

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

- Manual personal data processing with paper filing system;
- 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;
- Operators authorized and enabled by Intesi Group to carry out the identification activity.

- 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:

- 20 years from the end of the relationship except for biometric data which are deleted without undue delay;
- For paper, the time needed to transfer paper to digital;
- 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.

Data Controller: Pursuant to the Law, the Data Controller 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 (contactable as follows: e-mail dpo@ig-trustmail.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 Qualified Trust Services Provider, Intesi Group must keep all information related to the Qualified Electronic Signature from the moment of its issue for at least twenty years as required by art. 32 co. 3 lett. j) of the CDA, 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 - Rights of the Data Subject

1. The data subject has the right to obtain confirmation as to whether or not personal data concerning him or her exist, regardless of their being already recorded, and disclosure of such data in intelligible form, and the right to lodge a complaint with the supervisory authority.

2. The data subject has the right to be informed of:

- a. the source of the personal data;
- b. the purposes and methods of processing;
- c. the logic applied if the data are processed by electronic devices;
- d. the identification data concerning the Data Controller, the Data Processors and the representative designated as per article 5, comma 2;
- e. the entities or categories of entity to whom or which the personal data may be disclosed and who or which may get to know said data as designated representative in the State's territory, as data processors or as persons in charge of the processing.

3. The data subject is entitled to obtain:

- a. the updating, rectification or, where interested therein, integration of the data;
- b. the erasure, anonymisation or blocking of data that have been unlawfully processed, including data whose retention is not necessary for the purposes for which they were collected or subsequently processed;
- c. certification to the effect that the operations as per letters a) and b) have been notified, as also related to their contents, to the entities to whom or which the data were disclosed or disseminated, unless this requirement proves impossible or involves a manifestly disproportionate effort compared to the right that is to be protected;
- d. the portability of the data.

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

- a. on legitimate grounds, to the processing of personal data concerning him/her, even though they are relevant to the purpose of the collection;
- b. to the processing of personal data concerning him/her, where it is carried out for the purpose of sending advertising materials or direct selling or else for the performance of market or commercial communication surveys.