

# INFORMATIONS PROVIDED TO THE DATA SUBJECT ACCORDING ART. 13 REG. EU N. 679/2016 (G.D.P.R.) ABOUT PROCESSING ON ITS PERSONAL AND SPECIAL CATEGORIES OF DATA

The Data Controller informs you, as data subjects, who will process your personal data, eventually belonging to particular categories too, where requested and conferred by the same, in compliance with the regulatory provisions of the sector and, in particular, those referred to European Regulation n. 679/16, to Italian Legislative Decree n. 196/03 as amended by Italian Legislative Decree 101/18, to the Guidelines and indications provided time by time by the Italian Supervisory Authority, as well as by any special laws that specifically regulate the pr cessing of special categories of data in order to guarantee a reinforced guarantee to the data subjects.

### **DEFINITIONS**

- Processing: any operation or set of operations which is performed on personal data or on sets of personal data, whether or
  not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval,
  consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- 2. Personal data: any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
- 3. Special categories of personal data: personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation;
- 4. Navigation data: the information systems and software procedures used to operate this website acquire, during their normal operation, some personal data whose transmission is implicit in the communication protocols of the Internet. This informations are not collected to be associated to identified individuals, but –due to their nature– could, through processing and association with data held by third parties, allow users to be identified. This category of data includes IP addresses or domain names of computers used by users who connect to the site, the URI (Uniform Resource Identifier) addresses of the requested resources, the time of 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 given by the server (successful, error, etc.) and other parameters relating to the about the user's operating system and computer environment. These data are used only to obtain anonymous statistical information on site usage and to check its correct functioning and is deleted immediately after processing. The data could be used to ascertain responsibility in case of hypothetical computer crimes against the site except for this possibility, the data on web contacts (navigation data) do not persist for more than seven days.

# **DATA CONTROLLER**

The Data Controller of your personal and special categories of data is ELETTRONICA S.p.A. (P. Iva 00886951003), via Tiburtina Valeria km 13,700, Rome; email: privacy@elt.it

## DATA PROTECTION OFFICER

1. The Data Protection Officer – D.P.O. is mr. Massimo Montanile, email dpo.elt@pec.it

# PURPOSES OF PROCESSING AND LEGAL BASIS

- 1. The Data controller will process your personal data in order to achieve specific purposes and only in the presence of a specific legal base provided for by the applicable legislation on the protection of natural persons with regard to the processing of personal data and on the free movement of such data. Specifically, the Data controller shall process the personal data only when one or more of the following legal grounds recurs:
- · the data subject has given consent to the processing of his or her personal data for one or more specific purposes;
- processing is necessary for the performance of a contract to which the data subject is party or in order to take steps;
- · processing is necessary for the purposes of the legitimate interests pursued by the controller;
- · processing is necessary for compliance with a legal obligation to which the controller is subject;



Below are listed the purposes for which your personal data are processed by the data controller and the legal basis on which the treatment is based on:

Purpose of the treatment	Legal basis
Allow the use of all the features of the website	Performance of a Contract
Check the correct functioning of the site	Performance of a Contract
Answer a request from data subject	to take steps at the request of the data subject prior to entering into a contract
Assessment of responsibility in case of computer crimes damaging the website.	legitimate interests
Human resources recruiting	legitimate interests
Providing informations about human resources activities running or starting up	legitimate interests
Allow the security controls required by laws	legitimate interests; legal obligation;
Enable the company to fulfil legal obligations (even of an administrative nature), regulation or provided for by EU Legislation.	legal obligation;
Detection, prevention, mitigation and investigation of fraud or illegal activity in connection with the services provided on the website	legitimate interests; legal obligation;

2. No automated decision-making process is provided according to article 22, paragraphs 1 and 4 of the EU reg. n. 679/16

## **RECIPIENTS OF PERSONAL DATA**

- 1. Your personal data may be processed under contract and for the purposes identified above and also from external processors appointed by the holder who carry out activities related to the provision of the services provided, i.e.:
- professionals (-eg chartered accountant);
- supplier of goods and/or services in outsourcing
- Your personal data may also be transferred to third parties in order to observe the obligations of law or contract and only for the time necessary to achieve this end (i.e. police authorities, judicial authorities -upon request- and other entities and/or recipient authority for laws and regulations.
- 3. Your data may also be processed by those authorized for that purpose by the holder for the purpose of fulfilment of the tasks and duties.
- 4. If your data should take for purposes of statistics, it will be sent anonymously.



#### TRANSFER OF DATA TO THIRD COUNTRIES OR INTERNATIONAL ORGANISATIONS

1. Your personal data will be processed within the European Union and stored on servers located in the European Union. Any transfer of data to international organizations and/or non-EU countries, will be one of the ways permitted by the legislation by adopting Standard Clauses approved by the European Commission, the selection of persons included in international programs for the free movement of data (eg. EU-USA Privacy Shield) or operating in countries considered safe by the European Commission.

#### **DATA STORAGE PERIOD**

- 1. Your personal data will be stored only for the time necessary to achieve the purposes of treatment above illustrated, respecting the principles of proportionality and necessity. In particular, your personal data will be stored as long as there is a contractual relationship with the data subjects and, anyway, no more than 10 years since the end of the contractual relationship, without a chance to storage it for a longer periodi if necessary for the management of judicial actions and/or to compliance with specific legal obligations.
- 2. The storage takes place both in printed and electronic form. In both modes of preservation, proper security measures, to ensure the integrity, confidentiality and availability of information, are put in place and tested periodically.

## **DATA SUBJECT'S RIGHTS**

 Data Subject has the right to ask the data controller for access to his personal data (to obtain confirmation as to whether or not personal data concerning him or her are being processed), rectification or erasure; he can also ask for the limitation of processing as well as to oppose their processing, in addition to the right to the portability of the data in accordance with art. 20 of EU reg. # 679/16.

#### RIGHT TO WITHDRAW CONSENT

At any time Data Subject has the right to revoke the consent given. In that case, Data Subject is aware that the withdrawal
does not affect the lawfulness of the processing based on consent given before the withdrawal, as well as is aware that any
withdrawal will not allow the delivery of provision based on consent given.

# RIGHT TO LODGE

- 1. At any time Data Subject has the right to lodge a complaint with the Italian Supervisory Authority (Autorità Garante per la Protezione dei Dati Personali) via:
- registered mail to the headquarters of the Authority (actually, Piazza di Montecitorio, 121, 00186 Roma)
- email avaible on the website (garante@gpdp.it or protocollo@pec.gpdp.it)
- fax (actually 0039.06.69677.3785) or to start a Judicial Claim.

## FACULTY AND OBLIGATION TO PROVIDE PERSONAL INFORMATION

Your personal data, including those belonging to special categories, must be freely given by you. The provision of your personal data is, however, necessary in all cases where the processing takes place on the basis of a legal obligation or to perform a contract to which you are party or in order to take steps at the request of the data subject prior to entering into a contract. A refusal could lead the Data Controller the impossibility to act for the purposes for which personal informations are collected.
 2.

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