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|  ESSEGI SYSTEM | INFORMATION FOR CUSTOMERS AND SUPPLIERS (GDPR) | CODICE: | MO-02.07-(EN) |
| | | REVISIONE: | 01 |
| | | DATA: | 07.10.2020 |
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28th May 2018, VERSION

**INFORMATION ON THE PROCESSING OF PERSONAL DATA
(according to EU Regulation 2016/679)**

I, BILATO ALESSANDRO, as the Data Controller of the company ESSEGI SYSTEM SERVICE SRL, with legal headquarters at VIA ZAMBON, 14/16 - 36051 CREAZZO (VI), inform you pursuant to Article 13 of EU Regulation No. 2016/679 (hereinafter "GDPR") that your data will be processed in the following ways and for the following purposes:

1. Subject of the Processing

The Data Controller processes personal data, identifying (for example, name, surname, company name, address, phone, email, banking and payment references), hereinafter referred to as "personal data" or "data," communicated by you when concluding contracts or orders for the services of the Data Controller.

2. Purposes of Processing

Your personal data will be processed:

Without your explicit consent (Article 24 letters a), b), c) of the Privacy Code and Article 6 letters b), e) of the GDPR) for the following Service Purposes:

- to conclude contracts for the services of the Data Controller;
- to fulfill pre-contractual, contractual, and tax obligations arising from existing relationships with you;
- to comply with legal obligations, regulations, community legislation, or orders from the Authorities (such as anti-money laundering);
- to exercise the rights of the Data Controller, such as the right of defense in court.

Only with your specific and distinct consent (Articles 23 and 130 of the Privacy Code and Article 7 of the GDPR), for the following Marketing Purposes:

- to send you via email, mail, and/or SMS and/or phone contacts, newsletters, commercial communications, and/or advertising material on products or services offered by the Data Controller, as well as to assess satisfaction regarding the quality of services;
- to send you via email, mail, and/or SMS and/or phone contacts, commercial and/or promotional communications from third parties.

Please note that if you are already our customer, we may send you commercial communications related to services and products of the Data Controller similar to those you have already used, unless you oppose (Article 130, paragraph 4 of the Privacy Code).

3. Processing Methods

The processing of your personal data is carried out through the operations indicated in Article 4 of the Privacy Code and Article 4, paragraph 2) of the GDPR, specifically: collection, registration, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, deletion, and destruction of data. Your personal data are processed both manually and electronically and/or automatically. The Data Controller will process personal data for the time necessary to fulfill the purposes mentioned above and, in any case, for no longer than 10 years after the termination of the relationship for Service Purposes and for prudential retention.

4. Access to Data

Your data may be made accessible for the purposes referred to in Article 2.A) and 2.B):

- to employees and collaborators of the Data Controller, in their capacity as internal data processors and/or system administrators.

5. Communication of Data

Without the need for explicit consent (pursuant to Article 24 letters a), b), d) of the Privacy Code and Article 6 letters b) and c) of the GDPR), the Data Controller may communicate your data for the purposes referred to in Article 2.A) to supervisory bodies (such as IVASS), judicial authorities, insurance companies for the provision of insurance services, as well as to those subjects to whom communication is mandatory by law for the fulfillment of the aforementioned purposes. These subjects will process the data as independent data controllers. Your data will not be disseminated.

6. Data Transfer

Personal data are stored on servers located: at the legal headquarters of Via Zambon, 14/16 Creazzo (VI), within the European Union, and at the offices of Microsoft Corporation, outside the European Union (contract concluded with Microsoft Ireland Operations Ltd, VAT: IE8256796U). It is understood that the Data Controller may transfer servers outside the EU if necessary. In such cases, the Data Controller ensures that the transfer of data outside the EU will take place in compliance with applicable legal provisions, following the stipulation of the standard contractual clauses provided by the European Commission.


7. Nature of Data Provision and Consequences of Refusal

The provision of data for the purposes of Article 2.A) is mandatory. In their absence, we will not be able to guarantee you the Services of Article 2.A). The provision of data for the purposes of Article 2.B) is instead optional. You can therefore decide not to provide any data or subsequently deny the possibility of processing data already provided; in this case, you will not receive newsletters, commercial communications, and advertising material related to the services offered by the Data Controller. However, you will still have the right to the Services referred to in Article 2.A).

8. Rights of the Data Subject

As a data subject, you have the rights provided for in Article 7 of the Privacy Code and Article 15 of the GDPR, specifically:

- to obtain confirmation of the existence or absence of personal data concerning you, even if not yet recorded, and their communication in intelligible form;
- to obtain information about:
 - the origin of personal data;
 - the purposes and methods of processing;
 - the logic applied in the case of processing carried out with the aid of electronic tools;
 - the identifying details of the Data Controller, the processors, and the designated representative pursuant to Article 5, paragraph 2 of the Privacy Code and Article 3, paragraph 1 of the GDPR;
 - the subjects or categories of subjects to whom personal data may be communicated or who may become aware of them as designated representatives in the territory of the State, processors, or agents;
- to obtain:
 - the updating, rectification, or, when you are interested, the integration of data;
 - the deletion, transformation into anonymous form, or blocking of data processed unlawfully, including data that do not need to be retained in relation to the purposes for which they were collected or subsequently processed;
 - certification that the operations referred to in letters a) and b) have been communicated, including regarding their content, to those to whom the data have been communicated or disseminated, except in cases where such compliance proves impossible or involves a manifestly disproportionate effort in relation to the protected right;
- to oppose, in whole or in part:
 - for legitimate reasons, the processing of personal data concerning you, even if pertinent to the purpose of collection;
 - the processing of personal data concerning you for the purposes of sending advertising material or direct sales or for conducting market research or commercial communication, using automated calling systems without operator intervention, via email, and/or traditional marketing methods by phone and/or postal mail. Please note that the data subject's right of opposition, as stated in the previous point b), for direct marketing purposes through automated methods extends to traditional methods, and the data

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subject retains the right to exercise the right of opposition even partially. Therefore, the data subject can choose to receive only communications through traditional methods or only automated communications or none of the two types of communication.
If applicable, you also have the rights provided for in Articles 16-21 of the GDPR (Right to rectification, right to erasure, right to restriction of processing, right to data portability, right to object), as well as the right to complain to the Data Protection Authority.

9. Cookie Policy

The following applications use cookies (with "this application" meaning each individual application mentioned): www.essegi-system.com

****Technical and aggregate statistical cookies****

****Strictly necessary activities for operation****

This application uses cookies to save the user's session and to carry out other activities strictly necessary for the functioning of this application, for example, regarding traffic distribution.

****Preference saving, optimization, and statistics activities****

This application uses cookies to save browsing preferences and optimize the user's browsing experience. Among these cookies are those for setting the language and currency or for managing statistics by the site owner.

****Other types of cookies or third-party tools that may install them****

Some of the services listed below collect statistics in aggregate and anonymous form and may not require user consent or may be managed directly by the owner—depending on what is described—without the use of third parties.

If any of the tools indicated below include services managed by third parties, these could—in addition to what has been specified and even unbeknownst to the owner—carry out user tracking activities. For detailed information, it is advisable to consult the privacy policies of the listed services.

****Statistics****

The services contained in this section allow the Data Controller to monitor and analyze traffic data and serve to track user behavior.

****Google Analytics (Google Inc.)****

Google Analytics is a web analytics service provided by Google Inc. ("Google"). Google uses the personal data collected to track and examine the use of this application, compile reports, and share them with other services developed by Google. Google may use personal data to contextualize and personalize the ads of its advertising network. Collected personal data: cookies and usage data.

Location of processing: USA – Privacy Policy – Opt Out. Subject adhering to the Privacy Shield.

****How can I express consent to the installation of cookies?*****

In addition to what is stated in this document, users can manage their cookie preferences directly in their browser and prevent—for example—third parties from installing cookies. Through browser preferences, it is also possible to delete cookies installed in the past, including the cookie in which consent to the installation of cookies by this site may be saved. Users can find information on how to manage cookies with some of the most common browsers at the following addresses: Google Chrome, Mozilla Firefox, Apple Safari, and Microsoft Internet Explorer.

Regarding cookies installed by third parties, users can also manage their settings and revoke consent by visiting the relevant opt-out link (if available), using the tools described in the third party's privacy policy, or contacting the third party directly.

Notwithstanding the above, users may use information provided by EDAA (EU), Network Advertising Initiative (USA), Digital Advertising Alliance (USA), DAAC (Canada), DDAI (Japan), or other similar services. With these services, it is possible to manage tracking preferences for most advertising tools. The Data Controller, therefore, advises users to utilize these resources in addition to the information provided in this document.

10. Methods for Exercising Rights

You may exercise your rights at any time by sending:

- a registered letter with acknowledgment of receipt to: ESSEGI SYSTEM SERVICE SRL, VIA ZAMBON, 14/16 CREAZZO (VI) - ITALY;
- an email to essegisystemservice@legalmail.it

11. Data Controller, Processors, and Appointed Staff

The Data Controller is BILATO ALESSANDRO, of the company ESSEGI SYSTEM SERVICE SRL, with legal and operational headquarters at VIA ZAMBON, 14/16, CREAZZO (VI).

The updated list of data processors and appointed staff is kept at the legal headquarters of the Data Controller.

****ACKNOWLEDGMENT****

The data subject, having read the information provided pursuant to EU Regulation 2016/679, hereby declares to have understood the purposes and methods of processing described above.

Gives consent to the processing and communication of personal data as indicated in point 2 A) of the above information.

I consent I do not consent

Gives consent to the processing and communication of personal data for optional purposes as indicated in point 2 B) of the above information.

I consent I do not consent

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| **Stamp and Signature for acknowledgment by the CLIENT or SUPPLIER:** | Data Controller |
| (NAME, SURNAME IN BLOCK LETTERS OF THE SIGNATORY) |  BILATO ALESSANDRO |