













DOCUMENT ON THE PROCESSING OF PERSONAL DATA					
CONTROLLER AND CONTACT DETAILS 	<p>Phoenix Technology S.r.l.</p> <p>privacy@photec.it</p> <p>Via Gradasso n. 36 - 48014 Castel Bolognese (RA)</p>				
DATA PROTECTION OFFICER AND CONTACT DETAILS 	<p>SGS Italia S.p.A.</p> <p>ssc@sgsitalia.postecert.it</p> <p>Via Caldera 21 - 20153 Milan, Italy</p>				
CATEGORIES AND TYPES OF DATA COLLECTED AND PROCESSED 	<table border="1" style="width: 100%;"> <tr> <td style="width: 50%; vertical-align: top;"> <p>For most of our services:</p> </td> <td style="width: 50%; vertical-align: top;"> <ul style="list-style-type: none"> ▪ contact information (name, personal and/or office address, telephone, e-mail addresses); and ▪ financial information (tax code and information pertaining to current account operations). </td> </tr> <tr> <td style="vertical-align: top;"> <p>For some of our services:</p> </td> <td style="vertical-align: top;"> <ul style="list-style-type: none"> ▪ Identifying information (e.g., date of birth, nationality, photographs, IP addresses and passwords); ▪ Professional and business information (training and work experience); and ▪ further data required to manage our business relationship in compliance with the specific applicable contractual terms or the General Contract Conditions. </td> </tr> </table>	<p>For most of our services:</p>	<ul style="list-style-type: none"> ▪ contact information (name, personal and/or office address, telephone, e-mail addresses); and ▪ financial information (tax code and information pertaining to current account operations). 	<p>For some of our services:</p>	<ul style="list-style-type: none"> ▪ Identifying information (e.g., date of birth, nationality, photographs, IP addresses and passwords); ▪ Professional and business information (training and work experience); and ▪ further data required to manage our business relationship in compliance with the specific applicable contractual terms or the General Contract Conditions.
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REA RA-133901
Share capital € 119.000

		<ul style="list-style-type: none"> - activities aimed at better understanding the needs of its customers, conducting opinion research on products and services that may be of interest; - assessment of potential actions in legal disputes; - actions aimed at ensuring the safety of the company's environment and IT infrastructure; and - risk management and compliance activities.
	<p>AS A RESULT OF ANY CONSENT GIVEN (Art. 6.1.A of the GDPR)</p> 	<p>In the event that an interested party has given the Company consent to process the Data for certain purposes (for example for marketing purposes), such processing is lawful based on the consent given.</p> <p>Consent is always optional and can be revoked at any time.</p> <p>For the avoidance of doubt, the withdrawal of consent does not affect the lawfulness of the processing of Data prior to the revocation itself.</p>
	<p>ON THE BASIS OF LEGAL OBLIGATIONS (Art. 6.1.C of the GDPR)</p> 	<p>The company is subject to several legal obligations, i.e., regulatory and legal requirements. The purposes of processing include the fulfilment of control and communication obligations pursuant to current legislation.</p>
<p>WHO HAS ACCESS TO THE DATA AND WITH WHOM WILL THE DATA BE SHARED?</p> 	<p>The other affiliates of the GPA Group have access to the data for service optimization. The affiliates of the GPA Group will act as processors appointed pursuant to Art. 28 of the GDPR or as independent controllers, depending on the circumstances and purposes.</p> <p>The data may be transmitted to third parties who need to carry out specific activities in relation to the Data, in accordance with the purposes of the processing or to service providers to the Company, such as IT and hosting service providers and subcontractors. When Phoenix Technology S.r.l. carries out these activities and takes action to ensure that they comply with its data security standards, so that the Data remains secure.</p> <p>The data can also be transmitted to authorities, entities and/or subjects to whom they must be communicated, pursuant to binding legal or contractual provisions. These authorities, entities and/or subjects will act as independent controllers.</p> <p>The data may also be consulted by third party members, when Phoenix Technology S.r.l. Suppose you sell or transfer part or all of your assets. In this case, the Company will take all contractual measures to ensure that the Company's security standards are respected, so that the Data remains secure.</p>	
<p>INTERNATIONAL TRANSFER OF DATA</p> 	<p>The company only transfers data across national borders inside and outside the EEA when:</p>	<p>it is justified for business purposes; and</p> <p>safeguards have been implemented to ensure that the data continues to be protected at least with the same level of protection as required in the jurisdiction of origin. To ensure this level of protection for customers' personal data, the company may enter into a data transfer agreement with the receiving third party based on the standard contractual clauses approved by the European Commission, or ensure that the transfer is to a jurisdiction subject to an adequacy decision by the European Commission.</p>

<p>HOW ARE YOUR DATA PROTECTED?</p> 	<p>The company implements appropriate organisational and technical measures to protect data against unauthorised, accidental or unlawful destruction, loss, alteration, misuse, disclosure or access and against all other unlawful forms of processing.</p> <p>These security measures have been implemented taking into account the state of the art of technology, their cost of implementation, the risks presented by the processing and the nature of the data, with particular attention to sensitive data. In particular, adequate awareness, confidentiality and training commitments are in place to ensure that data are not shared with or disclosed to unauthorised persons.</p>	
<p>HOW LONG WILL YOUR DATA BE STORED?</p> 	<p>Data will be stored on paper and/or electronically only for the time necessary for the purposes for which they were collected, respecting the principles of storage limitation and data minimisation defined in art. 5.1, letters c) and e) of the GDPR.</p> <p>The data will be kept to comply with regulatory obligations and pursue the aforementioned purposes, in accordance with the principles of necessity, minimisation and adequacy.</p> <p>The company may retain the data after the end of the contractual relationship to fulfil regulatory, contractual and/or tax obligations or in the event of legal action. Then, when the aforementioned reasons for processing cease, the data will be anonymised, erased or destroyed.</p>	
<p>RIGHTS OF THE DATA SUBJECTS</p> 	<p>Each data subject can exercise the following rights defined in Articles 15-22 of the GDPR by sending a written request to the company using the aforementioned contact details:</p> <p>The interested party may also lodge a complaint with the Supervisory Authority, represented in Italy by the Guarantor for the Protection of Personal Data (www.garanteprivacy.it), if he considers that the processing is contrary to the legislation in force and judicial recourse if he considers his rights violated</p>	<p>Access: the interested party can obtain information regarding the processing of his Data and a copy of the same.</p> <p>Cancellation: the interested party may request the cancellation of his Data, within the limits permitted by law.</p> <p>Opposition: the interested party may oppose the processing of Data, on the basis relating to his particular situation. In cases of opposition to the processing of Data pursuant to art. 21 GDPR, the Company reserves the right to evaluate the application, which will not be accepted if there are legitimate reasons to proceed with the processing that prevail over the freedoms and interests and rights of the Collaborator.</p> <p>Rectification: if the interested party considers that his Data are inaccurate or incomplete, he may request that they be modified accordingly.</p> <p>Restriction: the interested party may request the limitation of the processing of his Data.</p> <p>Revocation of your consent: where the interested party has given consent to the processing of his Data, he can revoke it at any time.</p> <p>Data portability: the interested party can receive, in a structured, commonly used and readable format, the personal data concerning him and has the right that such data, where requested, are transferred to another holder.</p>