

Privacy Notice

This privacy notice is provided pursuant to Article 13 of Regulation (EU) 2016/679 (the “**Regulation**” or “**GDPR**”)

With this notice the Joint Data Controllers, as defined below, wish to explain to you the purposes for which they collect and process your personal data, which categories are processed, what are your right under data protection law and how they can be exercised, as well as to allow you, where necessary, to give your consent concerning specific processing activities.

1. THE JOINT DATA CONTROLLERS

Tinexta S.p.A., the parent company of a group of companies whose list is published on the website www.tinexta.com/gruppo (the “**Group**”), with registered office in Rome, Piazza Sallustio n. 9, VAT No. 10654631000, in person of the legal representative (“**Tinexta**” or the “ **Holding**”), together with

InfoCert S.p.A. with registered office in Rome, Piazza Sallustio 9, Tax Code and VAT No. 07945211006, in person of the legal representative (“**InfoCert**”)

(“**Joint Controllers**” and each of them, respectively, a “**Joint Controller**”).

The Joint Controllers have entered into a joint ownership agreement pursuant to Article 26, GDPR, in order to regulate the mutual roles and responsibilities concerning the joint ownership of the personal data of the users of the Joint Data Controllers’ websites who have spontaneously provided their personal data on a specific page in order to be contacted to receive commercial proposals processed in the context of centralized activities and/or carried out in collaboration between the Subsidiary and the Holding Company (the “**Agreement**”).

It follows that your personal data, possibly provided by you through specific forms, will be automatically shared by Tinexta and InfoCert.

The essential content of the Agreement, upon specific request, is available to you at the offices of each Joint Controllers.

The Joint Controllers can be reached at the following contacts:

Tinexta: by email at tinexta@legalmail.it , or by ordinary mail at Tinexta S.p.A., Piazza Sallustio 9, 00187 Rome;

InfoCert: by email at infocert@legalmail.it or by ordinary mail at InfoCert S.p.A., Piazza Sallustio 9, 00187 Rome.



2. DATA PROTECTION OFFICER

The Joint Controllers have both designated the Group-wide DPO as their “**Data Protection Officer**” or “**DPO**”).

The DPO can be contacted via PEC at dpo_tinexta@legalmail.it, or by writing to:

Data Protection Officer

Tinexta S.p.A.

Piazza Sallustio n. 9

00187

3. DEFINITION OF PERSONAL DATA AND INFORMATION RELATING TO PROCESSING ACTIVITIES

In accordance with the GDPR, personal data means “*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*” (the “**Data**”).

In the context of the activities necessary and functional to follow up on your request to receive commercial and promotional information, the Joint Controllers collect and process the following categories of Data:

- i. personal and identification data (e.g., name, surname);
- ii. contact data, such as the address of residence or domicile, e-mail address, telephone number;
- iii. company/studio, sector;
- iv. in general, any other information that you may have provided that is functional to achieve the purposes identified below.

In this context, we would like to inform you that, to improve and enhance business efficiency, the Group has set up a shared management system for the Data of users of the Joint Controllers’s websites who request to be contacted to receive commercial and/or promotional information, based on a single IT structure that will allow, among other things, the sharing of your Data among the Joint Controllers.

The provision of your data is entirely voluntary; however, refusal to provide the information indicated may prevent the Joint Controllers from fulfilling your requests.

4. PURPOSE OF THE PROCESSING AND LEGAL BASIS

a) Performance of ordinary preventive controls

The Joint Controllers may collect and process your Data for the performance of ordinary preliminary verification activities for the provision of commercial offers and promotions and instrumental to any subsequent establishment of the contractual relationship.

If carried out, the processing will be based on the condition of lawfulness referred to in Article 6(1)(f) of the GDPR, i.e. the legitimate interest of the Joint Controllers in assessing the reliability of their contractual counterparty and preventing the risk of possible fraud.



b) Taking charge of and handling request

The Joint Controllers shall process the Data in order to fulfill your requests and, specifically, in the context of the activities necessary, functional and connected to their acceptance and management, including the creation of your personal data in the system, technical assistance or customer care activities in general, etc. The Joint Controllers, in order to achieve these purposes, process your Data based on the condition of lawfulness referred to in Article 6, paragraph 1, letter b), GDPR, the processing being necessary for the execution of measures taken at your request.

c) Marketing

The Joint Controllers shall process the Data in order to send you by e-mail (i) commercial or promotional communications relating to their products and/or services; (ii) invitations to take part in initiatives, promotional campaigns or events, workshops, courses, seminars and round tables that may be organized by the Joint Controllers, also in collaboration with third parties.

In this regard, we would like to inform you that in order to send you offers relating to products and services that may be of interest to you and to invite you to take part in initiatives that may be of interest to you, the Joint Controllers may take into consideration your characteristics, as they result from the Data provided by you to the Joint Controllers. This, however, will not affect your rights and freedoms as a data subject, as you will still be able to access all the products/services offered by the Joint Controllers or other companies in the Group without being restricted based on the characteristics of the data subjects.

The Joint Controllers will process your Data in accordance with the principles set out in the GDPR based on their legitimate interest, as set out in Article 6(1)(f) of the GDPR. In this regard, we specify that you may object to the sending of further communications, free of charge and at any time, by following the instructions at the bottom of each promotional message or, in the manner indicated in paragraph 9 below. In addition, if you have given your consent, each Joint Controller may process your Data to send you commercial and/or promotional communications concerning the products and services of the other companies of the Group and/or of third parties, as well as to invite you to participate in events, manifestations, seminars, etc., organized by the latter (“**Indirect Marketing**”).

The processing of your Data for this purpose will only be possible if you have given your consent, which is a condition of lawfulness. In this regard, we inform you that you have the right to revoke the consent previously given, free of charge and at any time, by using the link available at the bottom of all the Indirect Marketing communications that you may receive or by contacting one of the Joint Controllers in the manner indicated in paragraph 9 below.

d) Sending of customer satisfaction communications

The Joint Controllers may send you communications by e-mail or contact you by telephone to understand your opinion about a particular initiative or commercial activity proposed by the Joint Controllers, to improve their services and, in general, the customer experience in the future.

In this case, your Data will be processed based on the legitimate interest of the Joint Controllers, following the principles set out in the GDPR.

In this regard, you may at any time and free of charge exercise your right to oppose the receipt of further communications by clicking on the link provided at the bottom of each *customer satisfaction* email you receive.



If you do not wish to be contacted through telephone calls with an operator, we inform you that you may exercise your right to oppose the receipt of further calls by contacting one of the Joint Controllers at the addresses indicated above.

In this case, it will no longer be possible for the Joint Controllers to contact you again to understand your opinion about the offers or commercial initiatives of the Joint Controllers.

e) Performing statistical analysis

The Joint Controllers may process your personal data to carry out market and/or statistical analyses relating to their activities.

In this context, information is generally stored in anonymized form and processed in aggregate format. Therefore, such activities do not usually involve the processing of Data, i.e. information that can be traced back to you as an identifiable person.

If Data is processed, appropriate security measures (such as, but not limited to, pseudonymization) will be implemented. Any processing will be carried out based on the legitimate interest of the Joint Controllers.

5. COMMUNICATION OF DATA TO THIRD PARTIES LOCATED IN THE EUROPEAN ECONOMIC AREA

The Joint Controllers may communicate your Data to third parties who provide them with services that are necessary, functional or in any case connected to the above-mentioned purposes.

In particular, your Data may be communicated to subjects (e.g. companies, associations, bodies, professionals) that collaborate with the Joint Controllers in the context of the activities necessary for the marketing and promotion of their products or services, including, for example, technological service providers, marketing and/or communication agencies, external consultants, who will carry out the processing in their capacity as data processors. The updated list of data processors is maintained by the Joint Controllers and is available upon request.

Each Joint Controller may also disclose your Data to third parties to whom such disclosure is required by law, to Public Administrations, other organizations established within the European Economic Area, as well as to credit or electronic money institutions with which the Joint Controllers collaborate. These subjects will process your Data as autonomous Data Controllers.

Lastly, if you have given your consent in this sense, your Data may be communicated to third parties who, as independent Data Controllers, will process them to send you their own commercial or promotional communications.

6. TRANSFER OF DATA OUTSIDE THE EUROPEAN ECONOMIC AREA

In addition, in order to achieve the above purposes, your Data may be transferred to entities established in countries outside the European Economic Area, which offer to the Joint Controllers services related to the processing activities carried out.

Such transfer, where applicable, will only take place in compliance with the conditions set out in the GDPR and will be governed, depending on the recipients, through the use of standard contractual clauses adopted by the European Commission or, based on an adequacy decision of the Commission and/or any other instrument permitted by the reference legislation.

You may obtain more information on the place where your Data have been, if any, transferred by writing to the addresses mentioned in §§1 and 2.



7. DATA RETENTION PERIOD

The Joint Controller will process your Data for the time strictly necessary to achieve the purposes indicated and described.

In particular, depending on the purposes of the processing, the Data retention period is as follows:

- i. Performance of ordinary preventive controls: your Data will be processed only for the time necessary to carry out such controls;
- ii. Taking charge of and handling request: your Data shall be processed for 12 months from the provision of the Data and kept for the following 6 years, exclusively for purposes related to the fulfillment of legal obligations or the defense of the Joint Controller's rights;
- iii. Marketing: your Data shall be processed for a maximum period of 12 months from the registration of the Data, unless you exercise your right to object to the processing, or to withdraw your consent in case of indirect Marketing;
- iv. Sending of customer satisfaction communications: your Data shall be processed for a maximum period of 12 months from the registration or, if later, from the receipt of the last promotional offer, unless you exercise your right to object to the processing;
- v. Performing statistical analysis: your Data will be processed for the same period as in the point above unless you exercise your right to object to the processing.

8. RIGHTS OF THE DATA SUBJECT

During the period in which the Joint Controllers are in the possession or processing your data, you, as an interested party, can exercise the following rights at any time:

Right of access - You have the right to obtain confirmation of the existence of processing concerning your data, and, if applicable, the right to receive any information relating to the same treatment;

Right to rectification - You have the right to obtain the rectification of your data in our possession if they are incomplete or inaccurate;

Right to erasure - in certain circumstances, you have the right to obtain the erasure of your data stored in our archives if not relevant for continuing the contractual relationship or necessary to fulfill a legal obligation to which the Joint Controllers are subject or to ascertain, exercise or defend their right in court;

Right to restriction of processing - upon the occurrence of certain conditions, you have the right to obtain the limitation of processing concerning your data;

Right to portability - in the event of certain circumstances, you have the right to obtain the transmission of your data in our possession to a different owner;

Right to object - You have the right to object, at any time for the reasons connected to your particular situation, to the processing of data concerning you based on the condition of the lawfulness of the legitimate interest or the execution of a task of public interest or the exercise of public powers, including profiling, unless there are legitimate reasons for the Joint Controllers to continue the processing that prevail over the interests, rights and freedoms of the data subject or for the assessment, exercise or defense of a right in a judicial seat;



Right to withdraw the consent - You have the right to withdraw consent to the processing of your data at any time, without prejudice to the lawfulness of the processing based on the previous consent of the withdrawal;

Right to lodge a complaint with the Supervisory Authority - in the event that the Joint Controllers refuse to satisfy your access requests, the reasons for the relative refusal will be provided. If applicable, you have the right to lodge a complaint as described in the following paragraph.

The above rights may be exercised against the Joint Controllers by writing to the addresses referred to in §1 or by contacting the DPO of the Joint Controllers at the addresses indicated above in §2.

The exercise of your rights as an interested party is free of charge pursuant to and within the limits of Article 12, GDPR.

9. COMPLAINTS

If you wish to lodge a complaint about how your Data is processed by the Data Controllers, or about the handling of a request made by you, you have the right to lodge a complaint directly with the Supervisory Authority.

