



GRUPPO TECNOINVESTIMENTI

Information according to and by the effects of Legislative Decree no. 196/2003, “Personal Data Protection Code”

Pursuant to Art. 13 of Legislative Decree no. 196/2003, “Personal Data Protection Code,” your personal data will be processed according to principles of fairness, lawfulness, and transparency as well as the protection of your privacy and rights.

InfoCert, as data processor, hereby provides you this information about the processing method of personal data that have been directly provided by yourself, as Customer, or acquired by InfoCert during the undergoing relationship.

InfoCert may also acquire information about parties delegated by the Customer to get the Service, or to request technical support services, including online (the so-called *ticket*), on behalf of the Customer. Data regarding such parties, acting on behalf of the Customer, will be processed by InfoCert, with the methods and purposes set out in this document. The Customer undertake to make this information available to the parties who interact or will interact with InfoCert, in order to inform them about the processing of the personal data provided.

Data provided or otherwise acquired during the contractual relationship will be processed in paper, electronic or digital copy in order to properly provide and manage the services required by you and, in particular, to ensure:

- (i) registration at the e-commerce shop, *ecommerce.infocert.it* (hereinafter, the “**Registration**”);
- (ii) provision of the service requested for activation (hereinafter, the “**Service**”) and related activities;
- (iii) management and response to technical support requests by the Customer, including online (in which case, in order to ensure maximum transparency, InfoCert will provide you additional specific information to supplement the information contained herein);
- (iv) statistical task related to business to business and market analysis carried out anonymously and in an aggregate form
- (v) fulfilment of statutory obligations under applicable laws, of the obligations laid down by laws, regulations, Community legislation and provisions issued by the authorities empowered to do this by law, or by supervisory and control bodies.

Provision of data such as name, surname, social security number, sex, place and date of birth, address (except for the SPID - public system of digital identity), email address and telephone contact is mandatory, since each of these data is essential for Registration purposes in the InfoCert e-commerce shop and to perform the Service. Therefore, refusal causes the impossibility for InfoCert to complete the Registration and to activate and provide the Service requested by you.

Furthermore, because of the special nature of the purchased Service and the unpleasant consequences that may be caused by its non-renewal, our Company may also contact you by telephone to remind you the impending expiration of the Service.

Pursuant to current regulation, you will be kindly requested to confirm that you have read this information by ticking the box in the proper registration form.

In addition, **subject to your express consent**, your personal data may be processed for the following purposes (hereinafter referred to as “**Additional Purposes of InfoCert**”): direct sale of products or services, marketing purposes, promotion of InfoCert’s activities and presentation of InfoCert’s initiatives, by sending advertising material and business communications, both using electronic methods (e.g. e-mail, fax, short text messages), as well as traditional contact methods (telephone, postal mail). To this end, the Company may carry out activities under the said Additional Purposes of InfoCert both on its own and through third parties duly appointed as data processors.

Consent for the processing of personal data under **Additional Purposes of InfoCert** is **optional** and failure to provide such consent does not prevent you to get InfoCert’s Services and relevant technical assistance.

Pursuant to current legislation, it is possible to provide your optional consent for the processing of data described above by ticking the box, “*Gives consent*”, in the proper registration form. Consent will be valid for both traditional and electronic contact modes, but after consent is given, you may still opt out, even in part, to the various contact modes of said process.

Furthermore, **subject to your express consent**, your personal data may be processed for the following purposes (hereinafter the “**Additional Purposes of Third-Party**”): direct sale of products or services and for *marketing* purposes, promotion of activities and presentation of initiatives of third parties operating in the *Information and Communication Technology sector*, by advertising materials and commercial communications, both using electronic methods (e.g. electronic mail, fax, short text messages), as well as traditional contact methods (telephone, postal mail) and made by third parties with whom InfoCert has entered into commercial agreements.

Consent to process your personal data under **Additional Purposes of Third-Party** is **optional** and failure to provide such consent does not prevent you to get InfoCert’s Services and relevant technical assistance. Pursuant to current regulation, it is possible to provide your optional consent to process your data as indicated above, by ticking the box, “*Gives consent*”, in the proper registration form. Consent will





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be valid for both traditional and electronic contact modes, but after consent is provided, you may still opt out, even in part, to the various contact modes of said process.

In addition, except in case of objection of the Customer, to be exercised at any time by delivering a notice of objection to the Personal Data Protection Office at the address provided below in this disclosure, InfoCert may use the electronic mail address provided at the Service activation, to send information and commercial offers concerning InfoCert's products and services similar to the Service purchased by the Customer (so-called "*soft spam*"), pursuant to Article 130, paragraph 4 of Personal Data Protection Code.

Therefore, in the light of the above, all data requested during the Registration at the shop and Service activation (except those expressly indicated as optional, as well as the consent to the **Additional Purposes of InfoCert** and **Additional Purposes of Third-Party**) shall be mandatorily, for the purpose managing the registration and activation request and providing the Service; hence any refusal to provide such data would prevent InfoCert from following up your registration and activation request and providing the Service, and from providing technical assistance you may request. The Customer is also required to fill in the field, "*Technical or commercial email address*" and the two fields related to the telephone contact number. It is given that, if the Customer has not expressly provided consent for marketing purposes and/or object providing such data information for marketing purposes of services similar to the Service, the data provided will be used exclusively for technical communications.

Any mandatory information provided, will not be disseminated in any way and may only be disclosed or made available for the purposes described above, to InfoCert's subsidiaries and/or affiliates, and to other companies involved in the maintenance of IT systems or those acting in the Information and Communication Technology sector, as well as parties dealing with specific phases of data processing, such as independent data processors or data controllers duly appointed by InfoCert. The names of such parties shall be made available upon request of the persons concerned as well as any parties that are entitled by law and secondary legislation to access such data. Cooperativa Sociale Giotto, entity with registered office in Via Vigonovese 111, Padua, is responsible for carrying out customers support activities. Furthermore, even personnel of the Company specially appointed for the data processing may access the data.

The person concerned may exercise the rights under Article 7 of Legislative Decree no. 196/2003 as quoted below:

"1. Data subjects shall be entitled to obtain confirmation as to whether or not personal data concerning them exist (even if the data have not yet been recorded) and communication of such data in intelligible form.

2. Data subjects shall have the right of information on:

- a) the source of the personal data;*
- b) the purposes and modes of processing;*
- c) the logic applied when the data is processed by electronic means;*
- d) the identity of the data controller, data processing officers and the representative designated pursuant to Article 5 (2);*
- e) the entities or categories of entities to which the personal data can be transferred or which can gain knowledge of them as designated representatives of the state, data processing officers, or data processors.*

2. Data subjects shall have the right to obtain:

- a) data updating, correction or - where necessary - integration;*
- b) cancellation, anonymisation or blocking of data processed unlawfully, including data whose retention is unnecessary for the purposes for which the data were collected or subsequently processed;*
- c) certification that the parties to which the data have been transferred or disseminated have been notified of the operations under a) and b), also regarding their content, except for the case where notification proves impossible or requires the use of means clearly disproportionate to the right being protected.*

3. Data subjects shall have the right to oppose, wholly or in part:

- a) for legitimate reasons, the processing of their personal data even when it pertains to the purpose of collection;*
- b) the processing of their personal data for the purpose of sending advertising or direct marketing material or to conduct market research or commercial communication surveys"*

The data controller is InfoCert S.p.A., a company with registered office in Rome, Piazza Sallustio n. 9, 00187 Roma.

In order to exercise the rights under Article 7 of Legislative Decree no. 196/2003 as summarised above, please send a written request to:

"Responsabile per la Protezione dei dati Personali

InfoCert S.p.A.

Sede Operativa

Via Marco e Marcelliano 45

00147 Roma

richieste.privacy@legalmail.it"



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INFOCERT S.P.A.

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For more information about your privacy rights, please visit the Italian Data Protection Authority website at:
www.garanteprivacy.it.



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