

## InfoCert S.p.A. Website Privacy Policy

### WEBSITE PRIVACY POLICY

This information notice is provided pursuant to Article 13 of Regulation (EU) 2016/679 (the “**Regulation**” or “**GDPR**”) to those who browse the website below:

[www.infocert.it](http://www.infocert.it) (the “**Website**”)

It describes how the personal data of users who browse the Website is managed and processed. Precisely, this information notice applies to the Website only, with the exclusion of any other website the users might be re-addressed through links potentially available on the Website.

#### 1. WHO IS THE DATA CONTROLLER?

**InfoCert S.p.A.**, with registered office in Rome (RM), Piazza Sallustio n. 9, VAT no. 07945211006, in the person of its legal representative *pro tempore*, is the data controller of your personal data (“**InfoCert**” or the “**Data Controller**”).

#### 2. HAS INFOCERT APPOINTED A DATA PROTECTION OFFICER?

The Data Controller has appointed a data protection officer (“**DPO**”). The DPO can be contacted by e-mail at [dpo\\_tinexta@legalmail.it](mailto:dpo_tinexta@legalmail.it), or by writing to:

Data Protection Officer  
Tinexta S.p.A.  
Piazza Sallustio n. 9  
00187 Rome, Italy

#### 3. WHAT IS PERSONAL DATA? WHAT ARE THE PURPOSES OF THE PROCESSING OF YOUR DATA?

“**Personal Data**” means any information capable of identifying, directly or indirectly, a natural person, in this case, you who are browsing the Website (“**Data**”).

In particular, the Data Controller processes the Data indicated below:

- i. the IP address, domain name and URL of the device used;
- ii. the navigation data;
- iii. the browsing history;

as well as, in the sole case of requests you made through forms or pages potentially available on the Website:

- iv. your first and last name;
- v. your contact details (i.e., telephone and e-mail address);
- vi. any other Data that you voluntarily provide and that are necessary to follow up to your request.

When you visit the Website, InfoCert may therefore collect your Data both indirectly (*e.g.*, by tracking the IP address and URL of your device in order to monitor the use of the Website) and directly (*e.g.*, if you voluntarily enter your Data in specially prepared forms or create a profile on the Website); in the latter



case, the processing will be governed by information notices specifically prepared and provided from time to time by the Data Controller to which you should refer for further details.

The Data referring to you, whether collected directly or indirectly, may be processed by the Data Controller in order to carry out activities concerning the management and administration of the Website, as well as to improve the user's experience in navigating the Website.

In any case, we undertake to ensure that the information collected and used is appropriate with respect to the purposes of the Data Controller and that this does not lead to an invasion of your personal sphere.

#### **4. COOKIES**

Cookies are small pieces of information sent by a web server (*e.g.* a website) to the user's Internet browser, automatically stored on the user's computer and automatically sent back to the server each time the site is accessed.

InfoCert uses cookies in order to provide contextualized information to visitors to the Website and to obtain access statistics.

By default, almost all web browsers are set to automatically accept cookies. Visitors can set their device's browser to accept/reject all cookies or to display a cookie banner whenever a cookie is placed, so that they can decide whether to accept it. The user can, however, change the default configuration and disable cookies (*i.e.* to block them permanently) by setting the highest level of protection.

For any other information on the characteristics, types, use and ways to remove, delete or disable the cookies present on the Website, please refer to the specific "Cookie Policy".

#### **5. WHERE DO WE TRANSFER YOUR DATA?**

The server where the Website is hosted is in European Union.

Your Data may be transferred to external companies that provide InfoCert with Website maintenance and development services and, in general, with IT services, specifically appointed as data processors, as well as, where such communication is possible or required by law, communicated to other companies or Public Authorities located within the European Economic Area, which will process them for their own purposes as autonomous data controllers.

Your Data may also be transferred to third party companies located outside the European Economic Area which offer outsourcing technological services to the Data Controller; should such a transfer be necessary, we will ensure that the recipients of your Data have adopted appropriate security measures to guarantee their protection in accordance with the Regulation.

#### **6. HOW LONG DO WE KEEP YOUR DATA?**

We process Your Data for the time strictly necessary to achieve the purposes indicated in paragraph 3 above. The retention periods of the Data indirectly collected by the Data Controller through cookies are listed in the relevant Cookie Policy.

If You have directly provided us with Your Data through the Website, such Data will be deleted in accordance with the terms of the specific information notices provided by the Data Controller from time to time.

We reserve the right to retain log data for longer periods of time in order to deal with any crimes committed against the Website (*e.g.* hacking).



## 7. WHAT ARE YOUR RIGHTS AS A DATA SUBJECT?

You, as a data subject, have the right to:

- access the Data and request a copy thereof;
- request the rectification or updating of the Data, where inexact or incomplete;
- request, under certain circumstances, the erasure of the Data or the limitation of the processing of the Data;
- request the portability of the Data;
- object to the processing of the Data (where applicable);
- revoke the consent, where the processing of the Data is based on consent as legal ground.

Finally, you may at any time lodge a complaint before the Italian Data Protection Supervisory Authority.

In order to obtain further information on your rights, you may contact the Data Controller at the e-mail address [richieste.privacy@legalmail.it](mailto:richieste.privacy@legalmail.it), or the DPO at [dpo\\_tinexta@legalmail.it](mailto:dpo_tinexta@legalmail.it).

## 8. FINAL PROVISIONS

The Data Controller reserves the right to modify and/or update this information notice.

