

WEBSITE PRIVACY POLICY

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

www.infocert.it (the “**Website**”)

This information notice describes how the Website is managed with reference to the processing of personal data referring to users who browse it. The information notice applies to the Website only, with the exclusion of any website to which the user may be redirected via links that may be 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 n. 07945211006, in the person of its legal representative *pro tempore* is the data controller of Your personal data (“**InfoCert**” or “**Data Controller**”).

2. HAS INFOCERT APPOINTED A DATA PROTECTION OFFICER?

The Data Controller has appointed a data protection officer (“**Data Protection Officer**” or “**DPO**”). The DPO can be contacted by email at dpo.tinexta@legalmail.it, or by writing to:

Responsabile della Protezione dei Dati
Tinexta S.p.A.
Piazza Sallustio n. 9
00187 Roma (RM).

3. WHAT IS PERSONAL DATA? WHAT IS THE PURPOSE OF THE PROCESSING?

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

In particular, the Data Controller processes the following Data:

- i. IP address, domain name and URL associated to the device You used;
- ii. browsing data;
- iii. browsing history;

as well as, in case You made any request through forms 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 You have voluntarily provided and necessary to satisfy Your requests.

When You visit the Website, InfoCert may collect Your Data both indirectly (*e.g.*, by tracking the IP address and URL of Your device to monitor the use of the Website) and directly (*e.g.*, if You voluntarily



enter Your Data in dedicated forms or create a profile on the Website); in this second case, the processing will be governed by information notices specifically drafted and provided from time to time by the Data Controller to which You should refer for further details.

Your Data, 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 users' browsing experience and carry out - if the case be, also jointly with each of the social media platforms and/or each of the technology service providers listed here, but not limited to: Meta Platforms Ireland Ltd., LinkedIn Inc., Google Ads, Microsoft Advertising Bing, Spotify - promotional and marketing activities related to all products or services, of InfoCert, other companies of the Tinexta Group and/or third parties, also through promotional messages on the pages of the social media platform or of the technology service provider or within advertising spaces on other websites.

The processing in joint controllership with each social media or technology service provider – that is possible only if You have given Your specific consent to the installation of cookies for targeted advertising and other tracking tools with similar functionality (e.g., pixel, etc.) - will be limited to the processing activities strictly necessary for the selection of criteria functional to the determination of the scope of the campaign, for the definition of the relative audience, for matching with the users registered on the social platform or on the systems of the technology service provider, for the selection of criteria functional to the performance of the marketing activity, the publication of the promotional message and, if applicable, the delivery by the social platform or the technology services provider of statistical reports relating to the progress of the campaign.

For any further processing activity carried out by the social media platform or by the technology service provider as an independent data controller, please refer to the information notice pursuant to Article 13 or 14, GDPR, provided by the relevant social media itself or by the technology services provider, to which any requests for the exercise of the rights recognized under the GDPR relating to the processing it carried out as independent data controller shall be addressed. InfoCert is not responsible and is not liable in any way for any processing operations carried out by the social media platform or by the technology service provider further than the social media marketing activities described here.

In any case, the Data Controller undertakes to collect only information that is adequate, relevant, and limited to what is strictly necessary to achieve the purposes pursued from time to time, and ensures that this does not lead to a limitation or other violation of Your rights and freedoms as data subject.

4. COOKIE

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

InfoCert uses cookies and other tracking tools (*e.g.*, pixel) to provide certain information to users of the Website and to obtain statistics on accesses to the Website.

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

For any other information on the characteristics, classification, use and ways to remove, delete or disable cookies used on the Website, please refer to our specific “*Cookie Policy*”.

5. WHERE DO WE TRANSFER YOUR DATA?

The Website’s server is located within the European Union.

Your Data may be transferred to external companies that offer InfoCert maintenance and development services for the Website and, in general, 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 bodies located within the European Economic Area, which will process them for their own purposes as independent data controllers.

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

If You have given Your consent to the use of targeted advertising cookies (for details, please refer to the “*Cookie Policy*”), some Data will be processed by providers of social media platforms or technology services, each of them acting as InfoCert’s joint data controller. More information on the relationship between InfoCert and the joint controllers is available upon request.

6. HOW LONG DO WE KEEP YOUR DATA?

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

In case You have directly provided us with Your Data through the Website, such Data will be deleted in accordance with the terms set out in the dedicated information notices provided for by the Data Controller from time to time.

Data Controller reserves the right to retain the so-called log data for longer periods in order to be able 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 and request copies of the Data;
- request to rectify or update the Data, where inexact or incomplete;
- request, under certain circumstances, the deletion of the Data or the limitation of the processing;
- invoke Your right to portability of the Data;
- object to the processing (where applicable);
- revoke the consent, where the processing of the Data is based on that legal ground.

Lastly, You may at any time lodge a complaint before the Italian Data Protection Authority.

In order to obtain more information as to Your rights, please contact the Data Controller at the e-mail address richieste.privacy@legalmail.it, or the DPO at this e-mail address dpo_tinexta@legalmail.it.

8. FINAL PROVISIONS

InfoCert reserves the right to modify and/or update this information also on the basis of the legislative and regulatory changes of the applicable legislation on the protection of personal data, as well as in the event of any intervention by the competent Authorities.

Last update: September 2022