INFORMATION ON THE PROCESSING OF PERSONAL DATA pursuant to Articles 13 and 14 of Regulation (EU) 2016/679

Dear Users,

on this page you can find all the information regarding the management methods of the website https://euretica.it/privacy with reference to the processing of personal data of the users who consult it.

This information is provided pursuant to Articles 13 and 14 of EU Reg. 679/2016 (so-called GDPR), exclusively for the website https://euretica.it and not also for other websites that may be consulted by the user through links available on the website itself.

The texts, information, and other data published or accessible through forums on this website are for informational purposes only and do not have official status, except where otherwise provided for under current legislation.

Softgenia Srl assumes no responsibility for services offered by third parties with which the Site has activated a link, and for any other content, information or anything else contrary to the laws of the Italian State present in the resources of third parties linked to the attached links.

Data controller

The Data Controller is Softgenia Srl, based in Viale Montenero, 70 Milan, P.Iva n. 13220190964 Registration R.E.A. of Milan n. MI - 2710671.

Pec softgeniasrl@onepec.net

Data protection officer

We would also like to inform you of the contact details of the Data Protection Officer (DPO): Dr. Eleonora Cerofolini domiciled for the purpose at the offices of the Data Controller.

Legal basis for processing

As a consequence of browsing and consultation of the site, in order to be able to provide the various services described and contemplated therein, it is possible that the Data Controller may require you to provide certain data, through the completion of the various forms on the site. In general, personal data may be processed: A) with your consent, explicit and express; or B) without your consent, pursuant to Art. 6, par. 1, lett. b of EU Regulation 679/2016 " if the processing is necessary for the performance of a contract to which the data subject is a party or for the performance of pre-contractual measures taken at the request of the same", to fulfill contractual and/or tax obligations arising from existing relationships with the user/user of the services offered; to fulfill obligations required by law, regulation, EU regulations or an order of the Authority or to prevent or detect fraudulent activities or abuse harmful to the site; or also to exercise typical rights of the Data Controller, such as the right to defense in court.

The legal bases of processing are therefore art. 6 par. 1 letter b) - f) as the legitimate interest of the Data Controller as well as the related consent of the user art. 9, par. 2 letter a) when this is necessary and / or mandatory.

Also by navigating through the various pages of the site, the reasons and purposes of each required consent are made explicit.

Method of treatment

Data processing is carried out by means of the operations provided for in Article 4 of the GDPR and may consist of: collection, recording, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, deletion and destruction.

Processing may be either paper-based or electronic.

Contact via built-in forms on website, e-mail\_Call Center

Types of data processed and purposes of processing

There are no legal or contractual obligations for which the user must provide personal data through the forms on the site; however, in some cases it will not be possible to fulfill or fully respond to requests

made or fulfill requests: some data therefore are identified as mandatory and identified with an asterisk (\*).

At the possibility of contacting https://euroetica.it, you "land" from all pages describing The services offered.

In case of Telephone contact The data that will be requested and collected by the operator are: First Name, Last Name, e-mail, telephone, organization.

In case of contact request through the form "mail", The data related to the e-mail address, first name and last name marked with an asterisk \*, and are mandatory.

The text message, on the other hand, is optional

By clicking on the "SEND" button, the interested party authorizes the processing of the personal data communicated, the time of contact, any response and/or feedback provided, and in the case all subsequent correspondence, exclusively to fulfill his or her request.

Should you decide to attach, where required, any documentation (e.g., document in word, pdf or excel), the system is set up so that the data can be seen and communicated to the technical or business office staff designated for the purpose.

No storage of data or scanned document, is kept on website.

We also remind you, that in case a request is performed by a person under the age of 18 years, the provision of the service can only be carried out following express consent from a person with parental responsibility, which will be collected/confirmed at the contractual stage.

Any automated decision-making process, including profiling, pursuant to Article 22 (1) and (4) RGPD is excluded. Data are used exclusively for contact processing (Art. 6(1)(b) RGPD) and stored for 90 days.

Additional information for minors

We believe it is important to ensure added protection for minor children online. We encourage parents and guardians to spend time online with their children to observe, participate, and/or monitor and guide their online activity. We do not collect personal information from minors. If a parent or guardian believes that our site has a child's personal information in its database, please contact us immediately (using the email provided) and we will make every effort to remove that information as soon as possible. To this end, please also refer to the following regarding the rights of data subjects

## Navigation data

The computer systems and software procedures used to operate this site acquire, in the course of their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols.

This category of data includes IP addresses or domain names of the computers and terminals used by users, addresses in URI/URL (Uniform Resource Identifier/Locator) notation of the resources requested, the time of the request, the method used in submitting the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the user's operating system and computer environment.

Please refer to the COOKIES POLICY for details.

Access to data - Recipients - Data communication

The data may be made accessible to employees and collaborators of the Data Controller, in their capacity as persons operating under the Authority of the Data Controller and acting on the basis of specific instructions given with regard to the purposes and methods of such processing.

Without your express consent, the Data Controller may communicate the data to supervisory bodies, Judicial Authorities as well as to all other subjects to whom the communication is mandatory by law for the epletion of the above purposes.

Sofhgenia Srl does not operate any dissemination of data.

Place of processing

The management and storage of personal data will take place on servers located within the European Union of the Data Controller and/or third party companies appointed and duly appointed as Data Processors. Currently, our servers are located in Italy. The data will not be transferred outside the European Union. It is understood in any case that the Data Controller, should it become necessary, will have the right to move the location of the servers to Italy and/or the European Union and/or countries outside the EU. In this case, the Data Controller assures you as of now that the transfer of data outside the EU will take place in accordance with the applicable legal provisions by entering, if necessary, into agreements that guarantee an adequate level of protection and/or by adopting the standard contractual clauses provided by the European Commission and requesting your explicit consent.

The Processing of Personal Data will take place at the premises of the data controller as well as at the servers of ovh.com - France

OVH S.R.L. (Sole Shareholder) Share Capital €. 200,000.00 i.v.

Tax Code and VAT No. 06157670966 Milan Companies Register no.

REA n° 1873458.

Registered Office: Via Carlo Imbonati, 18 20159 Milan, Italy

OVH Srl is a subsidiary of OVH Groupe SA, registered with the RCS of Lille under number 537 407 926 and headquartered at 2, rue Kellermann, 59100 Roubaix.

RIGHTS OF THE DATA SUBJECT

As a data subject, you have the rights under Article 15 of the GDPR, namely the rights to:

A) To obtain confirmation of the existence or non-existence of personal data concerning him/her, even if not yet registered, and their communication in intelligible form;

B) Obtaining the indication:

Of the origin of the personal data;

Of the purposes and methods of the processing;

Of the logic applied in case of processing carried out with the aid of electronic instruments;

Of the identification details of the data controller, the data processors and the designated representative pursuant to Article 5, paragraph 2 Privacy Code and Article 3, paragraph 1, GDPR; and of the subjects or categories of subjects to whom the personal data may be communicated or who may become aware of them as designated representative in the territory of the State, data processors.

C) Obtaining:

The updating, rectification or, when interested, the integration of data;

The cancellation, transformation into anonymous form or blocking of data processed in violation of the law, including data whose retention is not necessary in relation to the purposes for which the data were collected or subsequently processed;

D) Object, in whole or in part:

For legitimate reasons to the processing of personal data concerning him/her, even if pertinent to the purpose of collection;

Where applicable, you also have the rights under Articles 16-21 GDPR (Right to rectification, right to be forgotten, right to restrict processing, right to data portability, right to object), as well as the right to complain to the Data Protection Authority.

E) To revoke any consent to the processing of your data, at any time, without affecting the lawfulness of the processing based on the consent given before revocation.

To exercise your rights, you may send a message directly to the company's PEC softgeniasrl@onepec.net

Without prejudice to any other administrative or jurisdictional recourse, You have the right to lodge a complaint with a Supervisory Authority if You believe that the processing concerning You violates the EU Privacy Regulation. We will comply within 30 days of receipt of your request. In case of failure to comply with your request, in the same 30 days, We will inform you of the reasons for non-compliance and of the possibility of proposing a complaint to a Supervisory Authority, which for the Italian territory is the Guarantor for the Protection of Personal Data according to the modalities provided on the website www.garanteprivacy.it

## Definitions

Personal Data (or Data) Personal data is any information that, directly or indirectly, including in connection with any other information, including a personal identification number, makes a natural person identified or identifiable.

Usage Data This is the information collected automatically through this Application (including by third party applications integrated into this Application), including: the IP addresses or domain names of the computers used by the User who connects with this Application, the addresses in URI (Uniform Resource Identifier) notation, the time of the request, the method used in forwarding the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response from the server (successful, error, etc...) the country of origin, the characteristics of the browser and operating system used by the visitor, the various temporal connotations of the visit (e.g. the length of time spent on each page) and the details of the itinerary followed within the Application, with particular reference to the sequence of pages consulted, the parameters relating to the operating system and the User's computer environment. For details, please refer to the COOKIES POLICY.

User The individual who browses the site and who, except where otherwise specified, coincides with the Data Subject.

Data Subject The natural person to whom the Personal Data refers.

Data Processor (or Processor) The natural person, legal entity, public administration and any other entity that processes personal data on behalf of the Controller.

Data Controller (or Owner) The natural or legal person, public authority, service or other body which, individually or jointly with others, determines the purposes and means of the processing of personal data and the instruments adopted, including the security measures relating to the operation and use of this Application.

Application The hardware and/or software tool by which Users' Personal Data are collected and processed.