

VERSION 1.0 dated April 25th, 2018

DISCLOSURE

ex Article 13 of the EU Regulation 679/2016 and Article 13 of the Legislative Decree no. 196/2003 (Privacy Code)

Dear User / Visitor,

We wish to inform you that the EU Regulation 679/2016 (and the Legislative Decree no. 196/2003) provides for individual protection with regard to the personal data processing. According to this legislation, the processing of personal data will be based on correctness, lawfulness and transparency principles, thus protecting your privacy and your rights.

Pursuant to the aforementioned article 13 of the EU Regulation EU 679/2016 and Legislative Decree no. 196/2003, we provide the following information to you:

- a)** The processing of the data you provided by completing this data collection form will be performed through an automated process and / or collection of paper documentation and pursues the following purposes:

- process your Data Controller information / contact request, made through the website **support.spencer.it**

It should be noted that, for neither section of the site nor for granting access to any functionality of the site, no "special categories of personal data" and / or "personal data relating to criminal convictions and crimes" is required, as defined by the articles 9 and 10 of the EU Regulation 679/2016: if, however, the User spontaneously sends such data to the Data Controller, the Data Controller will process all information of the aforesaid type in compliance with the current legislation regarding the protection of personal data (EU Regulation 679/2016) and limited to what is strictly necessary in relation to the specific requests of the interested User.

We remind you that the following information is valid only for this particular website and not for any other websites that may be consulted by accessing the links published on this site; We also remind you that the optional, explicit and voluntary sending of e-mails to the addresses indicated on this website entails the subsequent acquisition of the sender's address, necessary for the purpose of responding to their requests, as well as the acquisition of any other personal data included in the message.

- b)** Providing User personal data is not mandatory for the execution of the purposes referred to within this document before the letter **a)** and thus failure to provide this personal data (see mandatory data, marked with << * >>) could make it impossible for the Data Controller to take your information / contact request into consideration and / or may generate the impossibility to follow up on your requests; the personal data processing is not based on the conditions set forth in art. 6, paragraph 1, letter f) of the EU Regulation 679/2016;
- c)** Your personal data will be processed by subjects specifically appointed by the Data Controller as Data Control Responsible and / or by anyone acting under his authority and having access to personal data; these subjects will only process your data when it will be required and only when performing actions related to the purpose of conferment of the tasks assigned to them by the Data Controller, undertaking to only process the necessary data for carrying out these tasks and to perform only the necessary operations required for the completion of these tasks.
- c1)** The Data Controller may transfer personal data to a third party country or an international organization; in these cases the Data Controller undertakes to carry out the processing only based upon appropriate guarantees;
- c2)** in compliance with the provisions indicated within the "Measures and precautions prescribed to the Data Controllers with regards to the processing of their functions as system administrators and relative assignment by means of electronic instruments - November 27th, 2008" (Official Journal No. 300 of December 24th, 2008) with subsequent changes and amendments, the Data Controller may appoint specific "System Administrators" who might, even indirectly, while performing their functions, have access to services or systems that process or allow the processing of personal information.
- c3)** the data will not be disclosed to other third parties, if the express consent of the User was not obtained, in advance.
- Your personal data will not be disseminated.**
- d)** The data will be stored for as long as it is necessary in order to achieve the purposes for which the data were initially provided; The data will be stored in a form that allows the identification of the User concerned for a time period not exceeding the necessary framework of their collection or subsequent processing purposes; afterwards, if not expressly, once again, confirmed by the interested party, that relative personal data will be deleted, unless transformed into anonymous data.
- e)** The personal data provided will not be processed in order to implement an automated decision-making process (the so-called profiling).
- f)** In the hypothesis in which the personal data provided must be processed for other purposes than the ones indicated above, the Data Controller will inform the User regarding this different purpose and will provide any other relevant information.

Considering the state of the art and the implementation costs as well as the nature, scope, context and purpose of the personal data processing, both when he is determining the processing means, and at the time of the processing itself (the so-called risk analysis-accountability), the Data Controller has to put in place the adequate technical and organizational measures, aimed to effectively implement the data protection principles and integrate the necessary guarantees in order to meet the requirements of the EU Regulation 679/2016 and protect the rights of the interested parties.

Data will be processed by using the suitable methods and instruments in order to guarantee their security (Article 24, 25 and 32 of the EU Regulation 679/2016) and will be carried out through an automated process and through non-automated means (paper archives), to which all technical and organizational measures must be applied in order to ensure an appropriate security level for the relative risk, so as to ensure, on a permanent basis, their confidentiality, integrity, availability and also the resilience of the processing systems and services (by way of example but not limited to: control of tasks' assignment to the data processing responsible, and on the data classification itself; procedures, if sustainable, pseudonymization and encryption, disaster recovery mechanisms, etc.).

We inform you that the processing of data is based on the provisions of art. 6, paragraph 1, letter a) of the EU Regulation 679/2016 and the User is free to provide his own information by sending it to the Data Controller via the contact details fields on the website (**support.spencer.it**) and / or by filling out specific forms for collecting information available on the site; in the latter case, failure to provide certain data could, depending on the case, make it impossible to proceed with the activities requested by the User (for example, see "mandatory fields" marked with << * >> within the information collection forms).

The **Data Controller** is: **Spencer Italia S.r.l. a socio unico**, with Headquarters in Via Provinciale, 12 - 43038, on Sala Baganza (PR), Fiscal Code – VAT Number IT01633870348 Phone: 0039 0521 541111, Fax: 0039 0521 541222, E-mail: privacy@spencer.it, CEM (Certified Electronic Mail) spencer@pec.it

According to the art. 28 of the EU Regulation 679/2016, the Data Controller may use third parties who would process data on their behalf, formally appointed as Data Controllers. The complete and updated list of data processors appointed by the Data Controller will be provided to the User upon request, after sending a written communication in this regard to the addresses indicated above.

According to the art. 29 of the EU Regulation 679/2016, the Data Controller may use anyone acting under his authority and / or under the authority of the appointed manager; these subjects will be adequately trained.

The Data Controller has not designated the D.P.O. (Data Protection Officer) (Article 37 of the EU Regulation 679/2016 and the Article 29 of the WP

VERSION 1.0 dated April 25th, 2018

Guidelines issued on December 13th, 2016), as it is an unnecessary figure within the structure, given that the characteristics of the data processing do not fall within the cases referred to in the aforementioned Article 37.

The Data Controller also informs that:

- g)** the interested party (the User) has the right to ask the Data Controller to provide access to their personal data and correct it, or cancel it, or limit its processing or to refuse their processing, in addition to the data portability right (Article 15, 16, 17, 18, 20 of the EU Regulation 679/2016); while exercising their access rights, the interested party / User has the right to obtain from the Data Controller the confirmation that his personal data is or is not currently subjected to data processing, while exercising the data portability right allows the interested party to obtain from the Data Controller the personal data in object, in a common, readable and structured format, or the transfer of such data from the original Data Controller to another (see WP 242 issued on December 13th, 2016);
- h)** in case that the data processing is based on the article 6, paragraph 1, letter a) or on article 9, paragraph 2, letter a), the interested party has the right to withdraw his consent for personal data processing at any time, without jeopardizing the lawfulness of the data processing occurred on the basis of the given consent, before the revocation;
- i)** the interested party has the right to file a complaint towards a supervisory authority;
- j)** the interested party has the right to be informed, by the care of the Data Controller, without justified delay, regarding the fact that a violation of personal data is likely to present a high risk for the individual human rights and individual freedoms (art. 34 of the EU Regulation / 679/2016).

The full text of the articles of the EU Regulation 679/2016 related to individual rights (articles 15 to 23 inclusively) are available at any time at the following link on the website of the Personal Data Protection Authority:

- <http://194.242.234.211/documents/10160/0/Regolamento+UE+2016+679.+Con+riferimenti+ai+considerando>

or, alternatively, the Data Controller will provide this information upon User's request, by sending a communication to the previously indicated addresses.

Date of last modification :18/05/2018