

PRIVACY POLICY

INFORMATION PURSUANT TO ARTICLE 13 OF EU REGULATION 679/2016

European Regulation on the protection of individuals with regard to the processing of personal data and on the free movement of such data GDPR



Synchropal s.r.l. as Data Controller, pursuant to Article 13 of EU Regulation No. 679/2016, informs that the data will be processed in accordance with the principles established by the GDPR (General Data

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Protection Regulation EU 679/2016), i.e. in compliance with the principle of lawfulness, correctness, transparency, purpose limitation and storage, data minimization, accuracy, integrity and confidentiality.

The Data Protection Officer (DPO) is CEO Ibrahim Osmani (ibrahim.osmani@synchropal.com).

1. OBJECT OF PROCESSING

The data to be processed are:

1. navigation data
2. personal, identification and contact data

2. SOURCE OF THE PROCESSED DATA

The Data Controller processes navigation data and personal data voluntarily provided by the data subject during

- visits to the premises or telephone calls;
- requests for information in relation to participation in calls for tenders and initiatives;
- participation in competitions, contests and calls for tenders in accordance with the purposes of the law;
- participation in public events, conventions, seminars or institutional communication campaigns;
- subscription to newsletter services and registration to the reserved area of the website.

3. PURPOSE AND LEGAL BASIS OF PROCESSING

The personal data you provide, either voluntarily or in fulfilment of a legal obligation, will be processed for the purposes indicated below.

With regard to navigation data: to allow the user to navigate on the Data Controller's website; to carry out statistical research/analysis on aggregate or anonymous data, without the possibility of identifying the Visitor, aimed at measuring the operation, traffic and interest of the Site itself; to fulfil legal obligations to which the Data Controller is subject.

With regard to personal, identification and contact data, as well as special data: allow Synchronal to:

- provide information on services, on its activities and on initiatives of interest to enterprises, allow for regulatory checks to verify eligibility for participation in calls for tenders and competitions as well as the right to benefit from funding; participate in territorial initiatives to encourage development
- proceed with contracts for Satellite Certification of Origin and have access to production data. For further information on this specific point, please refer to the Privacy section of the contract.

In particular, the processing of personal data is based on the following legal bases:

- necessity of the processing for the purposes of entering into and performing the contract, or for the purposes of implementing pre-contractual measures taken at the request of the data subject (Art. 6 para. 1 lit. b GDPR);
- necessity of the processing for the purpose of fulfilling legal obligations to which the data controller is subject (Art. 6 par. 1 lett. c GDPR); for example, fulfilment of legal, regulatory or contractual obligations, execution of orders of judicial or administrative authorities;
- the necessity of the processing for the performance of a task carried out in the public interest or in the exercise of official authority vested in the data controller; in particular, for the management of the public evidence procedure aimed at selecting the contractor (Art. 6 para. 1 lit. e GDPR).

4. COOKIE POLICY

The Synchronal s.r.l. website makes use of cookies. To find out more, please read the specific cookie policy.

5. NEWSLETTER SERVICES

Through the website you can subscribe to the newsletter service that informs subscribers about Synchronal's activities, services provided and opportunities for companies.

6. SOCIAL CHANNELS

The social channels used by Synchronal can be accessed from the website, but only through the personal accounts of the persons concerned. The processing of data and content entered by interested parties is governed by a specific policy for social channels.

7. DISSEMINATION AND COMMUNICATION OF DATA

The personal data processed by the Data Controller will not be disseminated, i.e. they will not be disclosed to unspecified parties, in any possible form, including making them available or simply consulting them.

The data will be communicated to the recipients to the extent strictly necessary in relation to the above purposes. The data may be communicated to workers employed by the Data Controller; in particular, on the basis of the roles and tasks performed, some of them have been authorised to process personal data, within the limits of their competence and in accordance with the instructions given. Personal data may also be communicated, to the extent strictly necessary, to external parties who collaborate with the Data Controller and to parties who, for the purpose of providing services relating to the transaction

or contractual relationship with the Data Controller, must supply goods and/or perform services. They may also be communicated to the subjects entitled to access them by virtue of provisions of law, regulations and EU legislation.

Finally, the data may be communicated to third parties belonging to the following categories:

- subjects that provide services for the management of the information system used and for the operation of the Site;
- freelancers, studies or companies within the scope of relationships of assistance and fiscal, labour law and communication consultancy;
- credit institutions;
- authorities responsible for fulfilling legal obligations and/or provisions of public bodies, upon request;
- authorities in charge of tax and administrative inspection and verification activities;
- judicial authorities or judicial police, in the cases provided for by law
- any other public or private subject in the cases provided for by the law of the Union or of the Italian State.

Each subject who comes into possession of personal data by the LAG will be specifically appointed as Data Processor in accordance with the principle of accountability laid down in the legislation.

The list of such subjects, whether Natural or Legal Persons, is available to the interested parties who may request it by writing to the Data Controller.

8. TRANSFER OF DATA

The Data Controller does not transfer personal data to third countries or to international organisations. However, it reserves the possibility of using cloud services (e.g. OneDrive, Dropbox, etc.); in which case, the service providers will be selected from among those who provide adequate guarantees, as provided for in Article 46 GDPR 679/16 and considered autonomous data controllers.

9. METHODS OF DATA PROCESSING AND STORAGE

The processing will be carried out in automated and/or manual form, with methods and tools designed to ensure maximum security and confidentiality, by persons specifically appointed for this purpose in compliance with the provisions of art. 4 and the principle of accountability of the G.D.P.R. The Data Controller keeps and processes personal data for the time necessary to fulfil the purposes indicated, or to carry out what has been requested by the user. Subsequently, personal data will be stored, and not further processed, for the time established by the civil and fiscal regulations in force. With regard to tenders, contracts and assignments, the criteria used to determine retention periods are based on

- duration of the contractual relationship;
- legal obligations incumbent on the data controller, with particular reference to tax and fiscal matters;
- general provisions on prescription of rights.

The data acquired from the newsletter services and the reserved area will be processed as long as these services are active; afterwards they will be deleted, as required by law.

Synchropal does not adopt any automated process, including profiling as referred to in Article 22, paragraphs 1 and 4, GDPR.

10. RIGHTS OF THE DATA SUBJECT

Pursuant to GDPR 679/2016, the data subject has the right of access (art. 15), the right to rectification (art. 16), the right to erasure (art. 17), the right to restriction of processing (art. 18), the right to portability (art. 20), the right to object (art. 21), the right to object to automated decision-making (art. 22).

With regard to the newsletter and reserved area services, in order to exercise these rights, the interested party may use the special functions indicated at the bottom of the newsletter.

In order to assert his/her rights, the data subject may contact the Data Controller specifying the subject of his/her request, the right he/she intends to exercise and attaching a photocopy of an identity document attesting to the legitimacy of the request at the following address: info@Synchropal.com

11. ADDRESS OF SYNCHROPAL

Synchropal's address is Corso Barolo 47, 12051 Alba CN)

12. SYNCHROPAL E-MAIL ADDRESS

The email address to refer to is info@Synchropal.com

13. LEGITIMATE INTEREST OF THE HOLDER

Article 6 of the Data Protection Regulation 2016/679 (GDPR) provides for six hypotheses (so-called legal bases) capable of legitimising the lawful processing of personal data: consent of the data subject, performance of a contract, legal obligation, safeguarding the vital interests of the data subject, performance of a public interest and legitimate interest of the data controller. For these hypotheses, however, the balancing of data subjects' rights must always be taken into account, in the cases provided for by the legislation.

14. REFUSAL TO PROVIDE DATA

The data subject may not refuse to provide the Controller with the personal data necessary to comply with the laws governing commercial transactions and taxation.

The provision of further personal data may be necessary to improve the quality and efficiency of the procedures. Therefore, refusal to provide data required by law will prevent the processing of applications.

Persons acting in the name and on behalf of legal persons may refuse to provide the Controller with their personal data. However, the provision of such data is necessary for the proper and efficient management of the contractual relationship. Therefore, any refusal to provide such data may jeopardise all or part of the processing of the applications submitted.

15. WITHDRAWAL OF CONSENT AND LODGING OF COMPLAINTS

With reference to Article 6 of the GDPR 679/16, the data subject may revoke the consent given at any time, except for that relating to notices, competitions and tenders and the communication of data to third parties provided for by law, the non-transmission of which could compromise all or part of the related procedures. In order to stop using newsletter services, each data subject may use the special functions, according to the instructions given in or at the bottom of the newsletters themselves.

The data subject has the right to lodge a complaint with the supervisory authority: Garante della privacy www.garanteprivacy.it.