

### **PRIVACY POLICY**

INGEGNO SRL, with registered office in Piazza Toso 1 - 16011 ARENZANO, GENOA, ITALY and operating office in Via San Pier D'Arena, 33/2 – 16149 GENOA, ITALY, VAT N. 02366590996 (hereinafters refer to as "holder") as the holder of the processing of the information, inform you that according to the art. 13 Regolamento UE n. 2016/679 (hereinafter "GDPR") that your data will be processed with the following ways and for the following purposes.

### 1. Processing Object

All personal and identification data you have communicated, (such as name, surname, company name, address, email address, telephone number, bank's details, etc), will be processed for commercial agreements or contract only.

### 2. Data Processing Purposes

Your personal identification data will be processed without your consent (art. 6 lett. b), e) GDPR), for the following purposes only:

- definition and conclusion of contracts;
- fulfilling pre-contractual, contractual and fiscal obligations throughout our business relationship;
- fulfilling all obligations provided for by law or regulation or laid down by European Community legislation or by an order of the Authorities (such as in the field of anti-eciclage);
- exercise the Holders' rights, such as the right of defense in court.

## 3. Data Processing Methods

Your data processing is carried out according the operations indicated in the art. 4 n. 2) GDPR:

collection, registration, organization, preservation, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, deletion and destruction of data. Your personal data is subject to both paper and electronic processing. The holder wil keep your data for the time necessary to fulfill the above pruposes and in any case after ten years from the termination opf the relashionship.

#### 4. Data Access

Your data may be disclosed for the purposes refered to the art.2:

- to the holders'employees, in charge or responsible of the processing or as system administrators;
- to other companies or people (as banks, brokers, professional studios and consultants, etc.) who carry out activities in outsourcing on behalf of the holder, as external processing responsibles.

### 5. Data Communication

Without your consent (art. 6 lett. b) e c) GDPR), the holder can communicate your data, for the purposes referred to the art.2, to supervisory and judicial authorities (as IVASS), to insurance companies for the provision of insurance services, and to everyone to whom the communication is mandatory. The said parties will process the data as indipendent data controllers. Your data will not be disclosed.

# 6. Security

Your data will be stored and controlled by preventive security measures to minimize the risks of loss, destruction, unauthorized access, and treament not allowed and not in accordace with the indicated purposes.

### 7. Data Transmission

Your data handling and storage will be carried out within the European Community.

### 8. Diritti dell'interessato

As main party concerned, (art.15 GDPR) you have the right to:

- 1. obtain confirmation of your data existence, even if not registered yet, and of its communication in intelligible form;
- 2. be made aware of:
  - ✓ origin of your data information;
  - ✓ methods & purposes processing;
  - ✓ further information and details if your data is processed by electronic systems;
  - ✓ identification data of the holder, of his/her emplyoees, responsibles, everyone in charge in accordance to the art.3, comma 1, GDPS;



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- ✓ information of all categories of people, to whom your data may be disclosed, or who may have access to your data as people in charge within the state territory or responsible in any way;
- 3. obtain information about:
  - ✓ Your data update and integration;
  - ✓ cancellation or anonymization or block of all information illegally handled
  - ✓ proof that all peoples or subject involved, to whom Your data were disclosed, has been notified of the operations indicated in the artt. a) and b), except where such communication is not possible;
  - ✓ object, in whole or in part, to the processing of data for any legitimate reasons.

If applicable, You also have the rights indicated in the artt. 16-21 GDPR (right to rectification, right to be forgotten, right to restriction of processing, right to data portability, right to object to, as well as the right to complain to the Guarantor Authority

### 9. Rights Exercise Methods

At any time you can exercise Your rights by sending communication to:

by e-mail, to: info@ingegnodesign.co

by registered letter to: INGEGNO SRL - Via San Pier D'Arena 33/2 - 16149 GENOA, ITALIA

### 10. Holder, Responsibles and People in charge

The holder of data processing is INGEGNO SRL.

The updated list of respobsibles enad people in charge of the data processing is storage and available at the main office of Ingegno Srl

Genoa, 01.02.2023

INGEGNO S.r.I.