

## Information for Clients about personal data processing ex art. 13 Regulation EU 2016/679

### **Data Controller**

We inform you that, according to art. 13 of Regulation EU 2016/679 (hereinafter “Regulation” or “GDPR”), Your Personal Data are processed by Engineering Ingegneria Informatica S.p.a. as Data Controller (“Controller”) also on behalf of all the Companies of Engineering Group.

The Data Protection Officer (hereinafter, “DPO”) is achievable at this email address: [dpo.privacy@eng.it](mailto:dpo.privacy@eng.it).

### **Data object of the processing**

The Controller will process your personal data, collected as part of the contractual relationships with you, including, but not limited to, your name, last name, mobile phone-number, e-mail address and in general the Your contact details as a contact person in the commercial relations maintained.

### **Lawfulness, basis and optionality of processing**

Your personal data will be processed for the following purposes:

- a) execution of the contract and/or pre-contractual measures;
- b) fulfill any legal obligations;
- c) market analysis, statistics and related services;
- d) customer satisfaction verification;
- e) pre-contractual information and preliminary investigation regarding the contract stipulation;
- f) sending promotional or marketing communications.

The processing lawfulness for the purposes a) and b) are respectively the artt. 6(1)(b) e 6(1)(c) GDPR.

The processing lawfulness for the purposes c), d) and e) is the art. 6(1)(f) GDPR.

The provision of Your personal data for the purposes a), b), c), d) and e) above is optional, but in default it will not be possible to execute the contract.

Your personal data will also be processed with your specific consent, for the following purposes:  
g) send promotional and marketing communications, including newsletters and market researches, through automated tools (SMS, MMS, email, push notifications, fax) and not (paper mail, calls with operator); it is specified that the Controller collects a single consent for the marketing purposes described herein, in accordance with the General Provision of the Authority for the Protection of Personal Data "Guidelines on promotional activities and against spam" of 2013, 4<sup>th</sup> July; in any case, you wish to oppose the processing of your data for marketing purposes performed with the means indicated herein, as well as revoke the consent given; you may at any time contact the Controller at the addresses indicated in this statement, without prejudice to the lawfulness of the processing based on consent given before the revocation.

The basis of processing for the purpose f) is art. 6 (1) (a) of GDPR.  
The provision of your personal data for the purposes referred to in letter f) above is optional; there is no consequence in case of your refusal.

### **Recipients and data transfer**

Your personal data may be shared with:

- natural persons authorized by the Controller to process personal data pursuant to art. 29 GDPR for the performance of their job duties (eg employees and system administrators, etc.);
- service providers (such as consultants, credit institutions, etc.) who typically act as data processors pursuant to art. 28 of the Rules;
- subjects, bodies or authorities that are obliged to communicate their personal data in accordance with law or orders of the authorities.

The data may be accessible to other companies of the Engineering group for the same purposes as

above and / or for administrative and accounting purposes pursuant to art. 6 and to Recitals 47 and 48 of the GDPR.

The complete and updated list of data recipients may be requested to the Controller, at the addresses indicated above.

#### **Extra EU data transfer**

Regarding the possible transfer of Data to Third Countries, the Controller discloses that the processing will take place according to one of the methods permitted by the law in force, such as the consent of the subject, the adoption of Standard Clauses approved by the European Commission, the selection of subjects adhering to international programs for free circulation of data (eg EU-USA Privacy Shield) or operating in safe Countries by the European Commission. It's possible to have more informations to the above contacts, upon request, from the Controller.

#### **Personal data storage**

Your Personal Data will be kept only for the time necessary for the purposes for which they are collected, respecting the minimization principle as art. 5, paragraph 1, letter c) of the GDPR. The Controller may keep some data even after the termination of the contractual relationship, for the time necessary to fulfill contractual and legal obligations. Further informations are available at the Controller addresses.

#### **Data processing methods**

In relation to the mentioned purposes, the personal data processing takes place using manual, computerized and telematic tools with logic strictly related to the purposes themselves and, in any case, in such a way as to guarantee the security and confidentiality of the data and even the compliance with specific obligations sanctioned by the law. With the stipulation of the Contract it is required to give consent to the mentioned processing and it is required that the same information is eventually provided to all the parties to whom we will provide the data for the purposes mentioned above.

#### **Your privacy rights**

You have the right to ask the Controller, at any time, access to their personal data, correct or cancel them or oppose their processing, he is entitled to request the limitation of processing in cases provided for by art. 18 of the GDPR, to revoke the consent given pursuant to art. 7 of the GDPR at any time; to obtain, in a structured format, in common use and readable by automatic device, the data concerning it, in the cases provided for by art. 20 of the GDPR; and to propose a complaint to the competent control authority pursuant to article 77 of the GDPR (Personal Data Protection Authority) pursuant to art. 77 of the GDPR, if it considers that the processing of your data is contrary to the law in force.

You can make a request to object to the processing of data under Article 21 of GDPR which give evidence of the reasons justifying the opposition: The Controller reserves the right to assess your application, which would not be accepted in case of existence of legitimate reasons cogent to proceed with the processing that prevail over your interests, rights and liberties.

Requests must be sent in writing to the Controller or to the DPO at the addresses above indicated. Read and understand the privacy policy ex art. 13 of the GDPR in:

NAME AND LAST NAME \_\_\_\_\_

grants the consent

denies the consent



to the processing of your personal data by Engineering Ingegneria Informatica Spa, to send promotional and marketing communications, including newsletters and market research, through automated tools (SMS, MMS, email, push notifications, fax) and not (paper mail, call with operator).

Place, Date

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Signature

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