

Privacy

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Privacy Policy with regard to processing of personal data as per art. 13-14 of the European General Data Protection Regulation 2016/679

As required by art. 13 of the European General Data Protection Regulation 2016/679 (GDPR) on the protection of natural persons with regard to processing of personal data and on the free movement of such data, we inform you about the treatment of your personal data.

DEFINITIONS

In order to facilitate the understanding of this information, the following definitions are reported (Article 4 of the EU Regulation):

- **“processing”** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- **“personal data”** means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
- **“controller”** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data;
- **“processor”** means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

DATA CONTROLLER

The Data Controller pursuant to art. 4 paragraph 7 of the GDPR is the Legal Representative of the Company **Volos Informatica S.r.l.**, with registered office in Italy, Ivrea (TO), Canton Vigna 6/A. VAT 05155980013, e-mail: amministrazione@volos.it (mailto:amministrazione@volos.it), phone +39.0125.641133

PLACE OF DATA PROCESSING

All processing of data take place at Data Controller premises and or in any case within the EU and are only handled by the personnel in charge of the processing

PURPOSES OF THE PROCESSING

The personal data provided by the user are used for purposes related to the execution of the service or the requested service.

The processing operations will be aimed at satisfying:

1. of our information or operational needs for the opening, execution or termination of a contractual relationship with the person concerned, as well as the execution and control of the respective obligations arising from this relationship, as well as relating to relationships with suppliers, also potential, even in the absence of contractual relationships with the interested party and obligations regarding legal obligations;
2. of our needs for the best performance of our business, to carry out market surveys in the areas of our relevance, even in the absence of contractual relationships with the interested party.

The provision of data is mandatory for the purposes referred to in points 1) and optional for point 2).

No data will be communicated or disclosed to third parties, unless this is necessary in order to perform the service or requested.

PROCESSING METHODS AND DATA RETENTION PERIOD

The processing of personal data is managed through the operations indicated in art. 4 of the Italian Privacy Code and art. 4 n. 2) GDPR and precisely: such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

The data will be processed using manual and IT tools to store, manage and transmit data with logic strictly related to the purposes indicated and methods that ensure compliance with the obligations provided by law.

Personal data are processed for the time strictly necessary to achieve the purposes for which they were collected.

Specific security measures are observed to prevent data loss, illicit or incorrect use and unauthorized access.

CATEGORIES OF SUBJECTS TO WHICH DATA CAN BE COMMUNICATED

We also inform you that the processing of your personal data may be carried out by natural or legal persons who, on behalf and / or in the interest of our organization, provide specific services, including information and control, or that carry out related or support activities to those of our organization as well as to subjects to whom the right to access the personal data of the interested party is recognized by law.

Consequently, the personal data of “data subject” may be communicated, for treatments within the limits of the purposes and methods indicated above, to the following categories of subjects:

- physical / juridical subjects that collaborate in the activities of our organization and Company connected to it
- subjects to whom the communication follows legal obligations

The data subject may request the names of external persons who may become aware of their data

RIGHTS OF DATA SUBJECTS

Data subjects have the rights referred to in art. 7 of the Privacy Code and art. 15 GDPR and precisely:

1. The data subject has the right to obtain confirmation of the existence or not of personal data concerning him/her, even if not yet registered, and their communication in intelligible form
2. The data subject has the right to obtain the indication:
 1. of the origin of personal data
 2. of the purposes and methods of treatment
 3. of the logic applied in case of treatment carried out with the aid of electronic instruments
 4. of the identification details of the data controller, of the processors according to art. 5, paragraph 2 and art.3 paragraph 1, GDPR
 5. the subjects or the categories of subjects to whom the personal data may be communicated or who can learn about them as appointed representative in the territory of the State, processors or representatives
3. The data subject has the right to obtain:
 1. the updating, rectification or, when interested, integration of data
 2. the cancellation, transformation into anonymous form or blocking of data processed unlawfully, including data whose retention is unnecessary for the purposes for which the data were collected or subsequently processed

3. the attestation that the operations referred to in letters a) and b) have been brought to the attention, also with regard to their content, of those to whom the data have been communicated or disseminated, except in the case in which this fulfillment proves impossible or involves a use of means manifestly disproportionate to the protected right
4. The data subject has the right to object, in whole or in part:
 1. for legitimate reasons, to the processing of personal data concerning him, even if pertinent to the purpose of the collection
 2. to the processing of personal data concerning him for the purpose of sending advertising or direct sales material or for carrying out market research or commercial communication

Where applicable, data subjects also has the rights referred to in Articles 16-21 GDPR (right of rectification, right to be forgotten, right of limitation of treatment, right to data portability, right of opposition), as well as the right of complaint to the Guarantor Authority (Data Protection Supervisor).

MODALITIES FOR THE EXERCISE OF THE RIGHTS OF THE DATA SUBJECT

Data subjects may at any time exercise their rights by sending:

– a recorded delivery letter addressed to:

Volos Informatica Srl

Canton Vigna 6/A

10015 Ivrea (TO)

ITALY

– an e-mail to: volos.informatica@pec.it (<mailto:volos.informatica@pec.it>)

MODALITIES OF CONTACT DPO VOLOS

Volos DPO is contact is: volos.informatica@pec.it (<mailto:volos.informatica@pec.it>)

CHANGES

The Data Controller reserves the right to modify, update, add or remove portions of this statement at its discretion and at any time. Interested persons are required to periodically check for any changes. In order to facilitate this verification, the information includes an indication of the update date. The use of the site after the publication of the changes will constitute acceptance of the same.

Updated: 25 May 2018