

 <small>information technology laboratories</small>	Information on data processing ex art. 13 EU Regulation 2016/679	a SITA Company
	CUSTOMER INFORMATION	REVISION: C Date: 28/06/2022 Page: 1 of 2

Dear Customer,

Pursuant to Article 13 of EU Regulation 2016/679 of 27/04/2016, "European Regulation on the Protection of Personal Data", hereinafter referred to as GDPR, Software Design srl with registered office in Naples Capodichino Airport-viale F. Ruffo di Calabria snc, VAT no. 05695790633 - *pec* address softwaredesign@certificazioneposta.it, in the person of its legal representative pro tempore, as the Data Controller, informs you of the following.

Types of data processed

The Data Controller shall process your personal data (i.e. the personal data of its employees), collected within the scope of the contract/supply order signed between the parties and/or for the purpose of concluding the same, including but not limited to your name, surname, landline and mobile telephone number, e-mail address and in general your contact data as a contact person in the business relations entered into in the performance of the supply relationship.

Software Design does not require the Data Subject to provide so-called "special" data, i.e., in accordance with the provisions of the GDPR (art. 9), personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as genetic data, biometric data intended to uniquely identify a natural person, data relating to the person's health or sexual life or sexual orientation. In the event that the service requested from Software Design requires the processing of such data, the data subject will receive prior information and will be asked to give his/her consent.

Purpose of processing

Contract Management

Personal data exchanged between the Parties during the course of the supply contract will be processed exclusively for the purposes indicated :

- a. fulfilment of contractual accounting and tax obligations or pre-contractual measures;
- b. fulfilment of any legal obligations;
- c. to achieve effective customer relationship management;
- d. litigation management,
- e. customer satisfaction survey

The processing of functional data for the fulfilment of these obligations is necessary for the proper management of the relationship and their provision is mandatory for the implementation of the purposes indicated above. The Data Controller also makes it known that failure to provide, or incorrect communication of, any of the mandatory information may make it impossible for the Data Controller to guarantee the appropriateness of the processing itself.

The personal data of individuals will also be processed for:

- forwarding communications of various kinds and by various means of communication (telephone, mobile phone, text message, email, fax, paper mail) to fulfil market and statistical surveys and for promotional activities also relating to the dispatch of advertising and promotional material.

The provision of data is optional with regard to the aforementioned purposes, and a refusal to process them does not jeopardise the continuation of the relationship or the appropriateness of the processing itself.

Computer security

1. The Data Controller, in line with the provisions of Recital 49 of the GDPR, processes, also through its suppliers (third parties and/or recipients), the personal data of the Data Subject to the extent strictly necessary and proportionate to ensure network and information security, i.e. the ability of a network or an information system to withstand, at a given level of security, unforeseen events or unlawful or malicious acts that compromise the availability, authenticity, integrity and confidentiality of the personal data stored or transmitted. The Data Controller will promptly inform Data Subjects if there is a particular risk of a breach of their data without prejudice to the obligations arising from the provisions of Article 33 of the GDPR concerning personal data breach notifications. The legal basis for such processing is compliance with legal obligations and the legitimate interest of the Data Controller in carrying out processing for purposes of protecting the company's assets and the security of its premises and systems.

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	CUSTOMER INFORMATION	REVISION: C Date: 28/06/2022
		Page: 2 of 2

Data source

The personal data processed are those provided by the data subject on the occasion of:

- visits or phone calls;
- direct contacts for participation in exhibitions, shows, etc;
- bidding;
- commercial contracts;
- transmissions and transactions following the order.

Recipients and transfer of personal data

On the basis of their roles and work tasks, certain workers have been authorised to process personal data, within the limits of their competence and in accordance with the instructions given to them by the Controller.

Your personal data may be shared with external natural and/or legal persons (such as consultants, credit institutions, third-party suppliers, etc.) who provide services instrumental to the Controller's activities. These parties will typically act as data processors.

Your personal data may also be communicated, to the extent strictly pertinent to the obligations, to parties to whom such communication must be made in order to fulfil specific obligations laid down by laws, regulations and/or EU legislation.

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

Data transfer outside the EU

The Data Controller does not transfer personal data to third countries or to international organisations outside the EU. However, it reserves the possibility of using cloud services; 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.

Retention of personal data

Your personal data will only be kept for as long as necessary for the purposes for which they are collected, respecting the principle of minimisation set out in Article 5(1)(c) of the GDPR. After the termination of the contractual relationship, personal data will be retained, and not further processed, for the time stipulated by current civil and tax law provisions.

Modalities of data processing

In relation to the aforementioned purposes, personal data are processed by means of manual, computerised and telematic tools with logic strictly related to those purposes and, in any case, in such a way as to guarantee the security and confidentiality of the data, in addition to compliance with the specific obligations laid down by law.

The processing is carried out directly by the owner's organisation, its managers and/or appointees.

Your rights

You have the right to ask the Data Controller, at any time, for access to your personal data, to rectify or erase them or to object to their processing; you have the right to request the restriction of processing in the cases provided for by art. 18 of the GDPR; to revoke the consent given ex art. 7 of the GDPR at any time; to obtain in a structured, commonly used and machine-readable format the data concerning him or her, in the cases provided for in Article 20 of the Regulation; as well as to lodge a complaint with the competent supervisory authority (Garante per la Protezione dei Dati Personali) pursuant to Article 77 of the GDPR, if he or she considers that the processing of his or her data is contrary to the legislation in force.

You may exercise your rights by writing to the Data Controller at privacy@swdes.it.

Automated decision-making processes

The Controller does not process the data of natural persons acting on behalf of customers by means of automated decision-making processes.