

PRIVACY POLICY

pursuant to Article 13 of EU Regulation 2016/679

Who are we and why are we providing you with this document?

Techboard Group Srl, a limited liability company, in its capacity as **Data Controller**, has for years considered the protection of the personal data of its own and/or potential customers and suppliers to be of fundamental importance, guaranteeing that the processing of personal data, carried out by any means, whether automated or manual, takes place in full compliance with the protections and rights recognised by Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (hereinafter the "**Regulation**") and by the further applicable rules on the protection of personal data.

The term 'personal data' refers to the definition contained in Article 4(1) of the Regulation, i.e. 'any information relating to an identified or identifiable natural person; an identifiable person is one who can be identified, directly or indirectly, by reference in particular to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to his or her physical, physiological, genetic, mental, economic, cultural or social identity' (hereinafter '**Personal Data**').

The Regulation provides that, before processing Personal Data - by which is meant, according to the definition contained in Article 4(2) of the Regulation, "any operation or set of operations which is performed upon personal data or sets of personal data, whether or not by automatic 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' (hereinafter referred to as 'the **Processing**') - it is necessary that the person to whom such Personal Data belong is informed of the reasons why such data are required and how they will be used.

In this regard, the purpose of this document is to provide you, in a simple and intuitive manner, with all the useful and necessary information so that you can provide your Personal Data in a conscious and informed manner and, at any time, request and obtain clarifications and/or corrections.



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This Information Notice, therefore, has been drawn up on the basis of the principle of transparency and all the elements required by Article 13 of the Regulation.

If necessary, this Information Notice may be accompanied by a consent form as provided for in Article 7 of the Regulation, articulated according to the further type of use we intend to make of your Personal Data

For what purposes will your Personal Data be processed?

The data is processed for the performance of all activities necessary and functional for the provision of the services requested, for the performance of contractual obligations to which you are a party, for the consequent fulfilment of legal and fiscal obligations, and for administrative and commercial purposes.

How is your Personal Data processed?

Personal Data is processed using manual, computerised and telematic tools, guaranteeing the security and confidentiality of the data.

We remind you that the obligations relating to the GDPR do not apply to legal persons, Entities and Associations. Therefore, this notice is only addressed to natural persons, without prejudice to the obligation of absolute confidentiality to the nature of the data processed also for subjects belonging to the other categories mentioned.

To which subjects may your Personal Data be communicated?

Your Personal Data may be disclosed to specific entities that are considered recipients of such Personal Data. In fact, Article 4 point 9) of the Regulation defines a recipient of Personal Data as 'the natural or legal person, public authority, service or other body that receives communication of personal data, whether a third party or not' (hereinafter referred to as the '**Recipients**').

In this perspective, in order to properly carry out all the Processing activities necessary to pursue the purposes set out in this Policy, the following Recipients may be in a position to process your Personal Data:

- Third parties who carry out part of the Processing activities and/or activities connected and instrumental to the same on behalf of the Data Controller. These subjects have been appointed as data controllers, which term shall mean, in accordance with Article 4, point 8) of the Regulation, "the



natural or legal person, public authority, service or other body that processes Personal Data on behalf of the Data Controller" (hereinafter referred to as the "**Data Controller**");

- individuals, employees and/or contractors of the Data Controller, who have been entrusted with specific and/or multiple Processing Activities of your Personal Data. Such individuals have been given specific instructions on the security and proper use of Personal Data and are defined, pursuant to Article 4(10) of the Regulation, as "persons authorised to process Personal Data under the direct authority of the Controller or the Processor" (hereinafter the "Authorised Persons");
- where required by law or in order to prevent or suppress the commission of a criminal offence, your Personal Data may be disclosed to public bodies or judicial authorities without these being defined as Data Recipients. Indeed, according to Article 4(9) of the Regulation, 'public authorities that may receive communication of Personal Data in the context of a specific investigation in accordance with Union or Member State law shall not be considered as Recipients'.

For how long will your Personal Data be processed?

One of the principles applicable to the Processing of your Personal Data relates to the limitation of the storage period, which is governed by Article 5(1)(e) of the Regulation, which states that *"Personal Data shall be kept in a form which permits identification of Data Subjects for no longer than it is necessary for the purposes for which it is processed; Personal Data may be kept for longer periods provided that they are processed solely for archiving purposes in the public interest or for scientific or historical research or statistical purposes in accordance with Article 89(1), subject to the implementation of appropriate technical and organisational measures required by this Regulation to protect the rights and freedoms of the Data Subject"*.

In the light of this principle, your Personal Data will be processed by the Data Controller only to the extent necessary for the fulfilment of the aforementioned purpose and in accordance with the relevant regulations. In particular, your Personal Data will be processed for a period of time equal to the minimum necessary, as indicated in Recital 39 of the Regulation, that is, until the termination of the existing contractual relationship between you and the Data Controller, without prejudice to an additional storage period that may be imposed by law as also provided for in Recital 65 of the Regulation.

In relation to the processing carried out for the purposes set out in Section E of this Policy, the Data Processors may lawfully process your Personal Data until you communicate, in one of the ways set out in this Policy, your wish to withdraw your consent to any or all of the purposes for which you have



been asked to consent. If you withdraw your consent, the Data Processors will be required to cease processing your Personal Data for such purposes.

Is it possible to withdraw the consent given and how?

As provided for by the Regulation, if you have given your consent to the Processing of your Personal Data for one or more of the purposes for which you have been asked to process it, you may at any time withdraw it in whole and/or in part without affecting the lawfulness of the Processing based on the consent given before the withdrawal.

The procedures for revoking consent are very simple and intuitive; all you need to do is contact the Data Controller using the contact channels provided in this Policy. Quali sono i tuoi diritti?

As provided for in Article 15 of the Regulation, you will be able to access your Personal Data, request its rectification and updating if incomplete or erroneous, request its deletion if it was collected in violation of a law or regulation, and object to its processing for legitimate and specific reasons.

In particular, we list below all your rights that you may exercise, at any time, vis-à-vis the Data Controller:

- Right of access: you have the right, pursuant to Article 15(1) of the Regulation, to obtain from the Controller confirmation as to whether or not your Personal Data is being processed and, if so, to obtain access to that Data.
- Right of rectification: you may obtain, pursuant to Article 16 of the Regulation, rectification of your Personal Data that is inaccurate. Taking into account the purposes of the Processing, you may also obtain the integration of your Personal Data that is incomplete, including by providing a supplementary declaration.
- Right to erasure: you may obtain, pursuant to Article 17(1) of the Regulation, the erasure of your Personal Data without undue delay and the Data Controller shall be obliged to erase your Personal Data.
- Right to restriction of processing or to object: you may obtain the restriction of the Processing, pursuant to Article 18 of the Regulation.
- Right to data portability: you may, at any time, request and receive, pursuant to Article 20(1) of the Regulation, all of your Personal Data processed by the Data Controller in a structured, commonly used and readable format or request that it be transmitted to another data controller without hindrance. In this case, it will be your responsibility to provide us with the exact details of the

new data controller to whom you intend to transfer your Personal Data by providing us with written authorisation.

- Right to lodge a complaint with the supervisory authority: without prejudice to your right of recourse in any other administrative or judicial forum, if you consider that the Processing of your Personal Data carried out by the Data Controller is in breach of the Regulation and/or the applicable legislation, you may lodge a complaint with the competent Data Protection Authority.

To exercise all your rights as identified above, simply contact the Data Controller by

Controller by sending an e-mail to the e-mail address privacy@techboardgroup.com.

Where will your Personal Data be processed?

Your Personal Data will be processed by the Data Controller within the territory of the European Union.

Should it be necessary, for technical and/or operational reasons, to use subjects located outside the European Union, we hereby inform you that such subjects will be appointed as Data Processors pursuant to and for the purposes of Article 28 of the Regulation and the transfer of your Personal Data to such subjects, limited to the performance of specific Processing activities, will be regulated in accordance with Chapter V of the Regulation. Therefore, all necessary precautions will be taken in order to ensure the most complete protection of your Personal Data, basing such transfer: (a) on adequacy decisions of the receiving third countries expressed by the European Commission; (b) on adequate safeguards expressed by the receiving third party pursuant to article 46 of the Regulation; (c) on the adoption of corporate binding rules.

In any case, you may request further details from the Data Controller if your Personal Data has been processed outside the European Union by requesting evidence of the specific safeguards adopted.