

DISCLOSURE

ex 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, as **Data Controller**, for years has considered the protection of the personal data of its and / or potential customers and suppliers of fundamental importance, ensuring that the processing of personal data, carried out in any way, is automated and manual, takes place in full compliance with the protections and rights recognized by **Regulation (EU) 2016/679** of the European Parliament and of the Council, of 27 April 2016, relating to the protection of individuals with regard to the processing of personal data, as well as free movement of such data (hereinafter the "Regulation") and other applicable rules on the protection of personal data.

The term personal data refers to the definition contained in article 4 in point 1) of the Regulation, that is "any information concerning an identified or identifiable natural person; the natural person who can be identified, directly or indirectly, with particular reference to an identifier such as the name, an identification number, location data, an online identifier or one or more characteristic elements of his physical identity is considered identifiable, physiological, genetic, psychic, economic, cultural or social "(hereinafter the "**Personal Data**").

The Regulation provides that, before proceeding with the processing of Personal Data - with this term, it must be understood, according to the relative definition contained in article 4 at point 2) of the Regulation, "any operation or set of operations, carried out with or without the support of automated processes applied to personal data or sets of personal data, such as the collection, registration, organization, structuring, storage, adaptation or modification, extraction, consultation, use, communication by transmission, diffusion or any other form of availability, comparison or interconnection, limitation, cancellation or destruction "(hereinafter the "**Treatment** ") - it is necessary that the person to whom such Personal Data belong to be informed about the reasons why such data is requested and how it will be used.

In this regard, this document aims to provide you, in a simple and intuitive way, with all the useful and necessary information so that you can give your Personal Data in an informed and informed way and, at any time, request and obtain clarifications and / or adjustments.

This information has therefore been prepared on the basis of the principle of transparency and of all the elements required by article 13 of the Regulation.

If necessary, this Information may be accompanied by a special form for the release of consent as provided for in article 7 of the Regulation, divided 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 are processed for the performance of all the necessary and functional activities for the provision of the requested services, for the execution of the contractual obligations of which the interested party is a part, for the consequent fulfillment of legal and tax obligations, as well as for administrative and commercial purposes.

How does the processing of your Personal Data take place?

The processing of personal data takes place using manual, IT 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 entities, bodies and associations. Therefore this information is addressed only 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 mentioned categories.

To which subjects will your Personal Data be communicated?

Your Personal Data may be disclosed to specific subjects considered recipients of such Personal Data. In fact, article 4 at point 9) of the Regulation defines as the recipient of a Personal Data "the natural or legal person, public authority, service or other body that receives communication of personal data, whether or not it is third parties "(hereinafter the" **Recipients** ").

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

- third parties who carry out part of the Treatment activities and / or activities connected and instrumental to them on behalf of the Data Controller. These subjects have been appointed as data processors, having to be understood individually with this term, in accordance with article 4 at 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 the" **Data Processor** ");
- individuals, employees and / or collaborators of the Data Controller, who have been entrusted with specific and / or more Processing activities on your Personal Data. Specific individuals have been given specific instructions regarding the security and correct use of Personal Data and are defined, in accordance with article 4 at point 10) of the Regulation, "persons authorized to process Personal Data under the direct authority of the Owner. or the Data Processor "(hereinafter the" **Authorized Persons**").
- If required by law or to prevent or suppress the commission of a crime, your Personal Data may be disclosed to public bodies or to the judicial authority without these being defined as Recipients. In fact, pursuant to article 4 in point 9) of the Regulation, "*public authorities that can receive communication of Personal Data in the context of a specific investigation in accordance with Union or Member State law are not considered Recipients*".

How long will your Personal Data be processed?

One of the principles applicable to the processing of your personal data concerns the limitation of the retention period, governed by article 5, paragraph 1, point e) of the Regulation which states "*Personal data are stored in a form that allows identification of the interested parties. for a period of time not exceeding the achievement of the purposes for which they are processed; Personal Data may be kept for longer periods provided that they are processed exclusively for archiving purposes in the public interest, for scientific or historical research or for statistical purposes, in accordance with article 89, paragraph 1,*

without prejudice to the implementation of technical measures and adequate organizational requirements required by these regulations to protect the rights and freedoms of the interested party ".

In light of this principle, your Personal Data will be processed by the Data Controller limited to what is necessary for the pursuit of the aforementioned purpose and in compliance with sector regulations. In particular, your Personal Data will be processed for a period of time equal to the minimum necessary, as indicated by Recital 39 of the Regulation, i.e. until the termination of the contractual relationships between you and the Data Controller without prejudice to a further retention period which may be imposed by law as also provided for in Recital 65 of the Regulation.

With regard to the processing carried out for the achievement of the purposes referred to in Section E of this Information, the Data Controllers may lawfully process your Personal Data until you communicate, in one of the methods provided for in this Information, your desire to revoke the consent to one or all the purposes for which you have been asked. Any revocation of consent will de facto require the Data Controllers to cease the processing of your Personal Data for these purposes.

Is it possible to revoke the consent given and how?

As required by the Regulation, if you have given your consent to the processing of your personal data for one or more purposes for which it has been requested, you can, at any time, revoke it totally and / or partially without affecting the lawfulness of the treatment based on the consent given before the revocation.

The methods of revoking consent are very simple and intuitive, just contact the Data Controller and / or the DPO using the contact channels listed in this Information.

What are your rights?

As required by article 15 of the Regulation, you will be able to access your Personal Data, request its correction and updating, if incomplete or incorrect, request its cancellation if the collection has taken place in violation of a law or regulation, as well as oppose the Processing for legitimate and specific reasons.

In particular, we list below all your rights that you can exercise, at any time, towards the Data Controller:

- Right of access: you will have the right, pursuant to Article 15, paragraph 1 of the Regulation, to obtain from the Data Controller confirmation that a Processing of your Personal Data is in progress and in this case, to obtain the access to such data.
- Right of rectification: you can obtain, in accordance with article 16 of the Regulation, the rectification of your Personal Data that are incorrect. Taking into account the purposes of the processing, moreover, you can obtain the integration of your Personal Data that are incomplete, also by providing an additional declaration.
- Right to erasure: you can obtain, pursuant to article 17, paragraph 1 of the Regulation, the erasure of your Personal Data without undue delay and the Data Controller will have the obligation to erase your Personal Data.
- Right to limit the treatment or to object: you can obtain the limitation of the treatment, in accordance with article 18 of the Regulation.
- Right to data portability: you can, at any time, request and receive, pursuant to article 20, paragraph 1 of the Regulation, all your Personal Data processed by the Data Controller in a structured, commonly used and legible format or request their transmission to another data controller without hindrance. In this case, it will be your care to provide us with all the exact details of the new data controller to whom you intend to transfer your Personal Data by providing us with written authorization.
- Right to lodge a complaint with the supervisory authority: without prejudice to your right to appeal to any other administrative or jurisdictional venue, if you believe that the processing of your Personal Data conducted by the Data Controller takes place in violation of the Regulation and / or applicable law, you can lodge a complaint with the competent Personal Data Protection Authority.

To exercise all your rights as identified above, simply contact the Data Controller by sending an e-mail to the email address privacy@techboardgroup.com.

The Company has appointed Dr. Agostino Oliveri as DPO (Data Protection Officer) who can be contacted at the following email address: a.oliveri@opendata.it

Where will your Personal Data be processed?

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

If for technical and / or operational reasons it is necessary to make use of subjects located outside the European Union, we inform you from now on that these subjects will be appointed as Data Processors pursuant to and for the purposes referred to in the article 28 of the Regulation and the transfer of your Personal Data to these subjects, limited to the performance of specific Processing activities, will be regulated in accordance with the provisions of Chapter V of the Regulation. Therefore, all necessary precautions will be taken in order to guarantee the most complete protection of your Personal Data by basing this transfer: (a) on adequacy decisions of the recipient third countries expressed by the European Commission; (b) on adequate guarantees expressed by the recipient third party pursuant to Article 46 of the Regulation; (c) on the adoption of binding corporate rules, so-called corporate binding rules.

In any case, you can request more details from the Data Controller if your Personal Data have been processed outside the European Union, requesting evidence of the specific guarantees adopted.

