



INFORMATION ON THE PROCESSING OF PERSONAL DATA PURSUANT TO ART. 13 GDPR

Dear interested party,

Pursuant to art. 13 of the GDPR (EU Regulation 2016/679), the following information is provided, in accordance with the principle of transparency, in order to make the person concerned aware of the characteristics and methods of the processing of his/her data.

1. Data controller

The Data Controller is Microprogel Srl, with registered office in Via Enrico Mattei n. 9, 35038, Torreglia (PD), and can be contacted at the following numbers: tel. 049-9930083, e-mail: dataprotection@microprogel.com
The Data Controller is responsible for the lawful and correct use of your personal data.

2. Data source and type

The personal data processed by the Controller directly from you are: **your contact data** (first name, last name, telephone number, e-mail address, etc.), **data relating to your profession or your role within the entity in which you work** and, if you enter into the contract with the Controller as a natural person, also **your personal and tax data**, which will be used for the purposes described below and on the basis of the following legal bases:

PURPOSE	LEGAL BASIS
1. Correct and complete performance of the contract , as well as performance of pre-contractual measures requested by the data subject.	Necessity of the processing by the Controller for the performance of obligations arising from pre-contractual measures requested by the data subject or from the existing contract, pursuant to Art. 6 para. 1 lit. b).
2. Fulfilment of legal obligations incumbent on the Controller (e.g. storage of billing data).	Necessity of the processing by the Controller to fulfil legal obligations arising from current legislation, pursuant to Art. 6 para. 1 letter c).
3. Establishing, exercising or defending a right in court or whenever the judicial authorities exercise their jurisdictional functions.	Necessity of the processing by the Controller for the legitimate interest of the Controller, pursuant to Art. 6(1) (f).

3. Treatment modalities

The processing of data is carried out by means of computerised procedures or, in any case, telematic means or manually and with paper supports by persons, internal or external, specifically appointed and authorised to do so and committed to confidentiality. Processing may therefore include operations of collection, recording, organisation, storage, processing on paper, automated or telematic supports. The processing is protected by adequate technical and organisational security measures, such as, inter alia, electronic archives protected by authentication credentials, access reserved only for authorised and periodically updated profiles, firewalls, antivirus, antispam, back-up and data recovery systems in the event of incidents, maintenance services, and limitation of the possibility of access to paper archives.

4. Recipients and categories of recipients of personal data

The data collected will not be disclosed or disseminated and will be processed within the Company by persons authorised to process the data under the responsibility of the Data Controller and for the purposes indicated above. The data may be communicated to external Data Processors who have entered into specific agreements, conventions/protocols of understanding or contracts with the Data Controller (e.g.: accountants, lawyers and other consultants who provide functional services for the purposes indicated above) as well as to all subjects whose right to access such data is recognised by virtue of regulatory provisions (e.g.: authorities and public bodies).



5. Transfer of data to third countries

The Data Controller will not transfer your data to third countries and international organisations.

6. Data retention period

Your data shall be processed and retained for the time necessary to perform the contract as well as for the fulfilment of administrative, accounting and tax purposes and for the fulfilment of the relative obligations and, in any case, within the prescriptive terms provided for by law for the exercise of the rights arising from the contractual relationship even after its definitive termination and those necessary for the settlement of disputes arising in the meantime, if longer. In any case, data processing may not exceed a period of 10 years from the termination of the contractual relationship.

7. Rights of the data subject

You may exercise your rights at any time, including: (a) **access** to your personal data, obtaining evidence of the purposes pursued by the Data Controller, the categories of data involved, the recipients to whom the data may be communicated, the applicable storage period, the existence of automated decision-making processes; (b) obtain without delay the **rectification** of inaccurate personal data concerning you; (c) obtain, in the cases provided for, the **cancellation** of your data; (d) obtain the **limitation** of the processing, when possible; (e) request the **portability** of the data provided to third parties specifically indicated by you, i.e. to receive them in a structured, commonly used and machine-readable format, also for the purpose of transmitting such data to another data controller, without any hindrance, in all cases where this is required by law; (f) lodge a **complaint** with the Italian Data Protection Authority.

The exercise of the aforementioned rights is subject to the limits, rules and procedures provided for in European Regulation 679/16 that the Data Subject must be aware of and put in place. In accordance with the provisions of Article 12 paragraph 3, moreover, the Data Controller shall provide the data subject with information on the action taken without undue delay and, in any event, no later than 30 days from receipt of the request. This period may be extended by 60 days if necessary, taking into account the complexity and number of the requests.

The Data Controller shall inform the data subject of this extension, and of the reasons for the delay, within 30 days of receipt of the request.

To exercise these rights, simply send a written request to the Data Controller or to the Data Protection Officer at the addresses indicated below, using the appropriate form available at the head office or on the institutional website.

8. Failure to provide data and its consequences

The provision of your personal data is necessary for the performance of the contract in place between the parties as well as to comply with legal obligations incumbent on the Controller. Therefore, if you fail to provide your personal data, the Controller may terminate the contractual or pre-contractual relationship with you.

9. Different purpose of processing

If the Controller intends to process your personal data for a different purpose from the one for which it was collected, the Controller will provide you with information on this different purpose and any other relevant information prior to such further processing.

10. Profiling

The Data Controller does not use automated processes for the purpose of profiling.

The Data Controller

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