

## Company Privacy Policy

### Services

This Privacy Policy applies to all services provided by our company **ISAF Srl**, for sites, communications and related services, including external services to the site, such as our advertising services.

Data processors and contracting parties

Our company will be responsible for the processing of personal data, processed or processed in connection with our Services. As a Visitor or Member of our Services, the collection, use and sharing of personal data are present in the privacy (which includes our Information on cookies and other documents in which we refer to this Privacy Statement) and related updates.

### Changes

Changes to the Privacy Policy and its use of our Services or to the first contact following the "date of entry into force". **ISAF Srl** on the basis of future regulatory developments will change this Privacy Policy, in case of substantial changes, according to the needs of the services, or better, as regards the opportunity to review the changes. If you disapprove of the changes, you can let us know by requesting data protection by sending a communication via e-mail to our address **privacy@isafsrl.eu**. We inform you about the privacy, if we do not receive different from each other, that will be the data subject to the updated Privacy Policy.

### Data Usage & Benefits

Data to provide, support, customize and develop our services. The way we use personal data from the services they use and from the choices in setting up updates and management of portals, websites or profiles. We do not use the data in our possession that the search for personalization or profiling.

### Our services

Data management for access to our services.

### Marketing

We promote the services we offer to you and to third parties, to do so we use data and content for submissions and communications that promote membership of our Services.

### Related services

We will share your personal data with our affiliates to provide you with our services or where there is the possibility of using third parties to help us with our services (i.e. filling in invoices or receipts, filling out templates related to the service provided, entering data, graphic elaborations, video and photography shooting, material printing and merchandising, technical assistance and hardware management and similar activities). These third parties will have access to your information to the extent reasonably necessary to perform these activities on our behalf and are obliged not to disclose or use them for other purposes.

### Legal disclosures

Permitted to share your personal data if we deem any of the following reasons applicable:

1. If required by law;
2. In order to protect the rights and/or security of our or third parties;
3. Need for us to disclose your personal information, only where required by law or if we believe in good faith that such disclosure is necessary for the purpose of preventing and/or acting in court and respective litigation processes in connection with illegal activities, both real or suspicious;
4. To assist jurisdictional authority including yet not limited to:
  - Executing existing contract (s) between you and our firm;
  - Due process investigation in support of your defense in relation to or in connection with any third party claims, charges, or allegations;
  - To protect the integrity of our information, safe-keeping of our service offered and safe-guarding of service rendered to you and/or our other clients and related parties;
  - To act in the best interest of society and exercise of citizens and country;
  - To protect social rapport, brand identity, firm defamation and professional reputation, of the firm, including by not limited to, its employees, other agents and associated contractors, vendors, customers and clientele.

Purpose of the treatment The personal data supplied by you will be processed for purposes related to the execution of the contract or assignment received, including any pre-contractual phase and, specifically, for the compilation of personal data lists, the keeping of accounts, invoicing, execution of communications with both paper and computerized means, tax compliance, organizational management of the services requested and stipulation of contracts, setting of appointments, order fulfillment, deliveries, bureaucratic requirements related to the services requested.

Your data may be used for sending commercial and / or promotional communications relating to products and services similar to those object of the contractual relationship, except for its dissent.

Your data may be processed for internal statistical purposes and market research. Failure to provide personal data will make it impossible for us to process contracts and other related obligations, as well as to properly manage mutual business relations.

Data retention We will retain the personal information you provide to us as long as you need to provide the services. Even if you use our services only occasionally or after a few years, we will retain your information and keep your profile open until

you decide to request cancellation from our archives (oblivion).

**Data security** We monitor security breaches, we try to prevent them and implement security protections designed to protect your data. We regularly monitor our systems to detect possible vulnerabilities and attacks, however, we can not guarantee the security of all information sent to us.

There is no guarantee that these data are inaccessible or that they can not be revealed, altered or destroyed due to the violation of one of our protections, whether physical, technical or management. For more information on the safe use of our Services, including two-factor authentication, please consult our Security Center. Data retention territory

We save and use your data within the European Community. The Data Controller does not transfer personal data to third countries or to international organizations, however, it reserves the right to use cloud services or outsourcing.

In these cases the service providers will be selected among those who provide adequate guarantees, as required by art. 46 GDPR 679/16.

### **Legal bases for data processing**

Your personal data will be processed for the execution of a contract, an assignment or for the execution of pre-contractual measures. Sending commercial and / or promotional communications relating to products and services similar to those covered by the contractual relationship is based on the legitimate interest of the Owner.

At any time you can withdraw the consent you gave us by sending a notice requesting cancellation or request for oblivion. We will collect and process your personal data only if we have legal basis for doing so.

The legal basis includes consent (where applicable), the contract (where data processing is necessary for the execution of a contract with you) and "legitimate interests".

When the processing of your personal data is subject to your consent, you have the right not to consent or withdraw your consent at any time; when the processing of your personal data is subject to legitimate interests, you have the right to object to it. To know more. If you have questions about the legal basis by which we collect and use your personal information, contact our Data Protection Officer.

### **Recipients of the data**

Your data may be disclosed to third parties for technical and operational requirements strictly related to the purposes set out above and in particular to the following categories of subjects:

- a) bodies, professionals, companies or other structures appointed by us in charge of processing related to the fulfillment of administrative, accounting and management obligations related to the ordinary conduct of our economic activity, also for purposes of credit recovery;
- b) to the public authorities and administrations for the purposes connected to the fulfillment of legal obligations or to the persons entitled to access it by virtue of provisions of law, regulations, community regulations;
- c) banks, financial institutions or other subjects to whom the transfer of the aforesaid data is necessary for the performance of our company activity in relation to the performance of the contractual obligations assumed in your comparisons.
- d) suppliers of installation, assistance and maintenance services for IT and telematic systems and systems and all the services that are functionally connected and necessary for the performance of the services covered by the Contract.
- e) Lists of subjects concerning the activities subject of our assignment and contract signed with you.

### **Right to oblivion**

- a) We retain some of your data even after the provision of services.
- b) If you choose to request the deletion of your data from our systems, such data will no longer be used within 30 working days. Generally, we delete information from our records within 5 days of receiving your request, except as indicated below.
- c) We retain your personal data even after the cancellation only if reasonably necessary, and for the time required, to fulfill our legal obligations (including requests for application of the law), meet regulatory requirements, resolve disputes, apply (where present) our contract or fulfill your request to "not receive" further messages from us.

contact info

You can contact us or use other options to resolve any complaints. If you have any questions or complaints regarding this Privacy Policy, you can always contact us using the links in the newsletters or by sending a communication via email or by registered mail to the addresses below.

- a registered letter with return to: **ISAF Srl – Via Bassano del Grappa, 4 – 00195 Roma (RM)**

- an e-mail to the address: **privacy@isafsrl.eu**