

PRIVACY POLICY

| | | |
|---|--------------------------------------|---|
|  | DATA CONTROLLER | BGY INTERNATIONAL SERVICES srl. Address: Via Orio al Serio 49/51 - 24050 Grassobbio (BG) E-mail address: privacy@sacbo.it (“Company”) |
|  | DATA PROTECTION OFFICER (DPO) | Partners4Innovation c/o S.A.C.B.O. S.p.A. Telephone number: 345 1682287, E-mail address: dpo.bis@bgvis.it |

PERSONAL DATA PROCESSED

1. Personal data processed for the purposes of Website operation

IT systems and software procedures used to operate the Website acquire, during ordinary functioning, some personal data whose transmission is implicit in the use of Internet communication protocols. This information is not collected to be associated with identified data subjects, but could, by its very nature, through processing and association with data held by the Company or third parties, identify Website users.

This category of data includes IP addresses or domain names of computers used to log on to the Website, URI (Uniform Resource Identifier) of resources required, the time of the request, the method used to submit the request to the server, the size of the file obtained in reply, the numerical code indicating the status of the response from the server (successful, error, etc..) and other parameters regarding the user's operating system and computer environment.

2. Data directly provided by users

The optional, express and voluntary sending of data as required by several sections of this Website are used in order to process the user's requests (by way of example, not limited to: when information or explanations are requested by phoning the numbers or by writing to the e-mail addresses indicated on the website). Any specific information, including summary information, is reported or displayed in the pages of the Website available for services on demand, in order to draw data subject's attention to the personal data processing.

3. Cookie

The Website makes use of cookies and similar technologies to ensure the proper functioning of procedures and to improve the experience of online applications.

For the use of cookies, please read the complete information by clicking [here](#).

Users are responsible for any third-party Personal Data obtained, published or shared through this Application and confirm that they have the third party's consent to provide the Data to the Owner.

| DATA PROCESSING PURPOSE | LEGAL BASIS FOR DATA PROCESSING | DATA RETENTION PERIOD |
|--|--|--|
| Website functioning <ul style="list-style-type: none"> ▪ Managing contacts and sending messages: management of a database of email contacts, phone contacts or any other contact information to communicate with the User. These services may also collect data concerning the date and time when the message was viewed by the User, as well as when the User interacted with it. | Performance of the contract involving the data subject (Website use). Services: <ul style="list-style-type: none"> ▪ Postmark: Privacy Policy https://wildbit.com/privacy-policy ▪ Incapsula: Privacy Policy | Throughout the session on the Website. Details regarding the services used: <ul style="list-style-type: none"> ▪ Postmark: Privacy Policy https://wildbit.com/privacy-policy ▪ Incapsula: Privacy Policy |

| | | |
|--|---|---|
| <ul style="list-style-type: none"> Traffic optimization and distribution: processed Personal Data depend on the characteristics and the way these services are implemented, considering that their function is to filter communications between this Application and the User's browser. SPAM protection: analyses of the traffic of this Application, potentially containing Users' Personal Data, with the purpose of filtering it from parts of traffic, messages and content that are recognized as SPAM. Analytics: the services contained in this section enable the Owner to monitor and analyze web traffic and can be used to keep track of User behavior. | <p>https://www.incapsula.com/privacy-policy.html</p> <ul style="list-style-type: none"> Akismet: Privacy Policy https://automattic.com/privacy/ Google Analytics (con IP anonimizzato): Privacy Policy https://policies.google.com/privacy?hl=it Opt out: https://tools.google.com/dlpage/gaoptout?hl=it | <p>https://www.incapsula.com/privacy-policy.html</p> <ul style="list-style-type: none"> Akismet: Privacy Policy https://automattic.com/privacy/ Google Analytics (con IP anonimizzato): Privacy Policy https://policies.google.com/privacy?hl=it Opt out: https://tools.google.com/dlpage/gaoptout?hl=it |
| <p>Contactual and/or pre-contractual purposes The data provided directly by the user shall be applied to the latter's requests (e.g. registration on the website or contact request).</p> | <p>Performance of the contract involving the data subject (Website use).</p> <p>Legitimate interest</p> | <p>As per the information provided upon data collection</p> |
| <p>Specific purposes The data provided directly by the user declaring his consent to data processing for specific purposes.</p> | <p>Consent (which is optional and can be withdrawn at any time).</p> | <p>Up to revocation of consent</p> |
| <p>Fulfillment of legal obligations or for the performance of a task carried out in the public interest</p> | <p>Legal obligations</p> | <p>Retained for the duration of the limits on admissibility of the fulfillments</p> |
| <p>After the above retention terms have expired, the Data will be destroyed, erased or anonymized, consistent with the technical procedures of erasure and backup.</p> | | |

DATA PROVISION COMPULSORINESS

Excluding the browsing data, required to implement IT protocols, the provision of personal data by users is free and optional. However, failing to provide such data will make it impossible to carry out the requests made or intended to be made by the user.

DATA PROCESSING METHODS

The Owner takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data. The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated.

PARTIES AUTHORISED TO PROCESS DATA

The data will be processed by employees, collaborators of the Company or external parties, in their capacity as processors and officers, performing on behalf of the Company technical and organizational tasks on the Website.

DATA RECIPIENTS

Personal data may be communicated to parties acting as data controllers (such as supervisory bodies and authorities and public organisations authorised to request data) or processed on behalf of the Company by parties appointed as data processors, who are provided with suitable operating instructions. These parties include the following categories:

- a) companies belonging to Company Group, working as data processors or for administrative and accounting purposes (e.g. purposes connected with internal, administrative, financial and accounting activities);
- b) natural and/or legal persons providing different services to the Company (e.g. suppliers of services for the management of the Website, such as system outsourcers, companies that provide connectivity services to the Internet, etc.). Such parties may also work as Data Processors;
- c) parties and/or public and private entities to which the data may be communicated for the purposes of fulfilling or enforcing the fulfillment of specific obligations required by laws, regulations and EU legislation. These subjects will operate as autonomous Data Controllers or Data Processors.

PERSONAL DATA TRANSFERS OUTSIDE THE EU

The data may be transferred to non-EU Countries, in particular to:

- Extra UE Countries whose data protection level is deemed adequate by the European Commission in accordance with article 45 of the GDPR;
- Extra UE Countries other than those referred to in the preceding paragraph a), after signing Standard Contractual Clauses adopted/approved by the European Commission in accordance with article 46, 2, letters c) and d) of the GDPR.

A copy of the above mentioned safeguards can be obtained sending a specific request to the Data Controller, according to the modalities specified in the following paragraph “Data Subject’s rights – Complaint to the Supervisory Authority”.

DATA SUBJECTS’ RIGHTS - COMPLAINT TO THE SUPERVISORY AUTHORITY

By contacting the Company via e-mail sent to privacy@sacbo.it, data subjects can require the controller to access personal data, as well as the correction or deletion of personal data, and are also entitled to restrict processing of such data in the cases set out in article 18 GDPR, and object the processing in case of legitimate interests of the controller¹.

Furthermore, in the case where processing is based on consent or a contract and carried out with automated tools, data subjects have the right to receive the personal data in a structured, commonly used and machine-readable format, and to transmit the data to another data controller without obstruction.

Data subjects have the right to lodge a complaint to the competent Supervisory Authority in the member state where they are resident or where they work, or the member state where the alleged breach took place

¹ Data Subjects’ rights

- **Accesso Your Data.** Users have the right to learn if the Owner is processing Data, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- **Have Your Data delated or otherwise removed.** Users have the right, under certain circumstances, to obtain the erasure of their Data from the Owner.
- **Verify and seek rectification.** Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- **Restrict the data processing.** Users have the right, under certain circumstances, to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.
- **Object the processing of Your Data.** Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent, in the exercise of an official authority vested in the Owner or for the purposes of the legitimate interests pursued by the Owner. When Data are processing for direct marketing purposes, data subjects can object to that processing at any time without providing any justification.