

PRIVACY POLICY FOR USERS OF WEB MONITORING PLATFORMS – ART.13 GDPR

HIGECO MORE S.r.l., with registered office in Viale Europa N°71 - 32100 - Belluno (BL) – Italy, Fiscal Code and VAT number 01200170254 (hereinafter, “**Holder**”), as data controller, pursuant to art. 13 of EU Regulation no. 2016/679 (hereinafter, “**GDPR**”), relating to the processing of company data **INDIVIDUAL PERSONS**, in line with the national legislative framework governed by Legislative Decree 196:2003 integrated by the amendments introduced by Legislative Decree 101:2018, wishes to inform you, as “**Interested**”, that the personal data provided by you will be processed in compliance with the legislation on privacy and the principles of correctness, lawfulness, transparency and protection of your privacy and your rights. In particular, your data will be processed in the manner and for the purposes defined in the following paragraphs.

TYPES OF DATA, PURPOSE AND LEGAL BASIS OF THE PROCESSING

As part of the monitoring activity guaranteed by the HIGECO CLOUD, VISION and similar services to which you have access, personal identification data corresponding to e-mail, telephone, possible name and surname, if provided as “username” or under the heading “full name”, for the following purposes:

1. fulfill the pre-contractual and contractual obligations connected to the requested service (guarantee the functionality of the service such as, for example, sending alerts);
2. fulfill the obligations established by laws or regulations, by community legislation, by requests from the Authority judicial;
3. exercise the Data Controller's rights, including, for example, the right to defense in court;

The legal basis that legitimizes the processing of the data referred to in point 1. is the execution of the contract of which the customer is a party, or the carrying out of pre-contractual activities at the customer's request; for point 2. the legal basis is represented by the fulfillment of legal or regulatory obligations; for point 3. the legal basis is represented by the pursuit of the legitimate interest of the data controller.

There is no processing of the data provided for marketing activities.

NATURE OF THE CONFERMENT

The provision of personal data relating to processing is optional. However, failure to provide the data, partially or totally, may result in the partial or total impossibility of establishing or continuing the relationship with the Customer, to the extent that such data is necessary for the execution of the same (for example, in the absence of the number of mobile phone it will not be possible to send SMS alerts).

RECIPIENTS OR ANY CATEGORIES OF RECIPIENTS OF THE PERSONAL DATA

The processing of customer data is carried out by the Data Controller's internal staff (employees, collaborators, etc.) identified and authorized for processing according to instructions given in compliance with current legislation on privacy and data security.

If this is necessary for the purposes listed above, the Customer's personal data may be processed by third parties appointed as Data Processors (pursuant to Article 28 of the GDPR) or “independent” Data Controllers, namely:

- by professionals, companies, associations or professional firms that provide the Data Controller with assistance or consultancy for administrative, accounting, fiscal, technical (IT) purposes;
- by all the public institutions established by law and more generally by all the bodies envisaged by current legislation on accounting and tax matters as recipients of mandatory communications;

In any case, the Customer's personal data are not subject to disclosure.

TRANSFER OF DATA TO A THIRD COUNTRY OR INTERNATIONAL ORGANIZATIONS

No transfer of data to third countries outside the EU or to international organizations is envisaged.⁽¹⁾

DATA RETENTION PERIOD

For the purposes referred to in points 1., 2. and 3., the customer's personal data will be processed and stored by the Data Controller for the entire duration of the contractual relationship and, at the end of the same for any reason, for the time established by the current legislation on accounting, tax, civil and procedural matters.

OTHER INFORMATION

The data communicated are not subject to automated decision-making processes (including profiling).

The data communicated will not be processed for purposes other than those for which they were collected, unless prior and exhaustive communications are made in accordance with the indications of Article 13, paragraph 2 of the GDPR.

¹ If there is the intention of the data controller to transfer personal data to a third country or to an international organization, the existence or absence of an adequacy decision by the Commission must be indicated or, in the case of transfers referred to in Article 46 or 47, or Article 49, paragraph 1, second subparagraph, of the Regulation the reference to the appropriate or appropriate guarantees and the means to obtain a copy of such guarantees or the place where they have been made available.

RIGHTS OF THE INTERESTED PARTY

In your capacity as interested party and in relation to the processing described in this Information, the customer has the rights referred to in articles 7, 15 to 21 and 77 of the GDPR and, in particular, the:

- **right of access** – article 15 GDPR: right to obtain confirmation as to whether or not personal data concerning the Customer is being processed and, in this case, obtain access to such personal data, including a copy of the same;
- **right of rectification** – article 16 GDPR: right to obtain, without unjustified delay, the rectification of inaccurate personal data concerning the Customer and/or the integration of incomplete personal data;
- **right to erasure (right to be forgotten)** – article 17 GDPR: right to obtain, without unjustified delay, the cancellation of personal data concerning the Customer;
- **right to limit processing** – article 18 GDPR: right to obtain the limitation of processing, when: the interested party disputes the accuracy of the personal data, for the period necessary for the Data Controller to verify the accuracy of such data; the processing is unlawful and the interested party opposes the deletion of the personal data and instead requests that their use be limited; the personal data are necessary for the interested party to ascertain, exercise or defend a right in court; the interested party has objected to the processing pursuant to art. 21 GDPR, in the period of waiting for verification regarding the possible prevalence of legitimate reasons of the Data Controller with respect to those of the interested party;
- **right to data portability** – article 20 GDPR: right to receive, in a structured format, commonly used and readable by an automatic device, the personal data concerning the Customer provided to the Data Controller and the right to transmit them to another Data Controller without impediments, if the processing is based on consent and is carried out by automated means. Furthermore, the right to have the Customer's personal data transmitted directly to another Data Controller if this is technically feasible;
- **right of opposition** – article 21 GDPR: right to object, at any time for reasons related to your particular situation, to the processing of personal data concerning the User based on the condition of lawfulness of legitimate interest or the execution of a task of public interest or of the exercise of public powers, including profiling, unless there are legitimate reasons for the Data Controller to continue processing which prevail over the interests, rights and freedoms of the interested party or for the establishment, exercise or defense of a right in court. Furthermore, the right to object at any time to processing if personal data is processed for direct marketing purposes, including profiling, to the extent it is connected to such direct marketing;
- **right of revocation** – article 7 GDPR: the Customer has the right to withdraw his consent at any time. The revocation of consent does not affect the lawfulness of the processing based on consent before the revocation;
- **right to complain** – article 77 GDPR: the Customer has the right to lodge a complaint with the Guarantor Authority for the protection of personal data, Piazza Venezia 11, 00187, Rome (RM).

HOW TO EXERCISE RIGHTS FOR DATA PROCESSED BY HIGECO MORE srl

You can exercise your rights at any time by sending:

- a registered letter with return receipt to HIGECO MORE Srl – Operational headquarters in via Cal longa N°48 - 32030 – Paderno (BL) - Italy;
- an email to the address privacy@higecomore.com with the subject wording “**privacy communications**”.

The exercise of rights is free pursuant to Article 12 GDPR. However, in the case of manifestly unfounded or excessive requests, also due to their repetitiveness, the Owner may charge you a reasonable fee, in light of the administrative costs incurred to manage your request, or deny satisfaction of your request.

OWNER, RESPONSIBLE AND PERSONS IN CHARGE OF THE DATA PROCESSED BY HIGECO MORE srl

The data controller is HIGECO MORE S.r.l. with registered office in Viale Europa N°71 - 32100 - Belluno (BL) – Italy

The updated list of data controllers and persons in charge of processing is kept at the operational headquarters of the Data Controller in via Cal longa N°48 - 32030 – Paderno (BL) – Italy