

## **Information according to the law no. 196/03 on the protection of personal data**

### **Updated with information in accordance with EU Regulation 2016/679 on the protection of personal data ("GDPR")**

Under Article 13 of the GDPR, the data controller informs that the personal data in our possession will be processed in compliance with the applicable legislation and the principles of correctness, lawfulness, transparency and protection of your privacy and your rights.

DATA CONTROLLER The data controller is Mr. Piermauro Blasi, via Zigliara 26, 00168 - Rome (RM)

The processing of personal data is carried out pursuant to Legislative Decree 196/03 "Code regarding the protection of personal data" of which the articles are reported:

#### **Art. 7. Right of access to personal data and other rights**

1. The interested party has the right to obtain confirmation of the existence or not of personal data concerning him/her, even if not yet recorded, and their communication in an intelligible form.

2. The interested party has the right to obtain the indication:

a) the origin of the personal data;

b) the purposes and methods of the processing;

c) of the logic applied in case of treatment carried out with the aid of electronic instruments;

d) the identity of the owner, manager and the representative appointed under article 5, paragraph 2;

e) the subjects or categories of subjects to whom the personal data may be communicated or who can learn about them as appointed representative in the State, managers or agents.

3. The interested party has the right to obtain:

a) updating, rectification or, when interested, integration of data;

b) the cancellation, transformation into anonymous form or blocking of data processed in violation of the law, including those that do not need to be kept for the purposes for which the data were collected or subsequently processed;

c) the attestation that the operations referred to in letters a) and b) have been brought to the attention, also as regards their content, of those to whom the data have been communicated or disseminated, except in the case in which this fulfillment is proves impossible or involves the use of means that are manifestly disproportionate to the protected right.

4. The interested party has the right to object, in whole or in part:

a) for legitimate reasons, to the processing of personal data concerning him/her, even if pertinent to the purpose of the collection;

b) to the processing of personal data concerning him/her for the purpose of sending advertising or direct sales material or for carrying out market research or commercial communication.

#### **Art. 8. Exercise of rights**

1. The rights referred to in article 7 are exercised with a request addressed without

formalities to the owner or manager, also through a person in charge, to whom suitable feedback is provided without delay.

2. The rights referred to in Article 7 cannot be exercised with a request to the owner or manager or with an appeal pursuant to Article 145, if the processing of personal data is carried out:

a) based on the provisions of the decree-law of 3 May 1991, no. 143, converted, with modifications, by the law July 1991, n. 197, and subsequent amendments, regarding money laundering;

b) based on the provisions of the decree-law of 31 December 1991, n. 419, converted, with modifications, by law 18 February 1992, n. 172, and subsequent amendments, regarding support for victims of extortion requests;

c) by parliamentary committees of inquiry established pursuant to article 82 of the Constitution;

d) by a public entity, other than public economic entities, on the basis of an express provision of the law, for exclusive purposes relating to monetary and currency policy, the payment system, the control of intermediaries and credit and financial markets, as well as the protection their stability;

e) pursuant to article 24, paragraph 1, letter f), limited to the period during which an effective and concrete prejudice could arise for the carrying out of defensive investigations or for the exercise of the right in court;

f) from suppliers of electronic communication services accessible to the public in relation to incoming telephone communications, unless an actual and concrete prejudice may arise for the carrying out of defensive investigations pursuant to law no. 397;

g) for reasons of justice, in judicial offices of all levels or the Higher Council of the Judiciary or other self-governing bodies or the Ministry of Justice;

h) pursuant to article 53, without prejudice to the provisions of law no. 121.

3. The Guarantor, also upon notification of the interested party, in the cases referred to in paragraph 2, letters a), b), d), e) and f), shall act in the manner referred to in articles 157, 158 and 159 and, in cases referred to in letters c), g) and h) of the same paragraph, proceeds in the manner referred to in article 160.

4. The exercise of the rights referred to in article 7, when it does not concern data of an objective nature, may take place unless it concerns the rectification or integration of personal data of an evaluation type, relating to judgments, opinions or other assessments subjective, as well as the indication of conduct to be held or decisions being taken by the data controller.

#### Art. 9. Methods of exercise

1. The request addressed to the owner or manager can also be sent by registered letter, fax or e-mail. The Guarantor can identify another suitable system with reference to new technological solutions. When it concerns the exercise of the rights referred to in article 7, paragraphs 1 and 2, the request can also be formulated orally and in this case it is briefly noted by the person in charge or manager.

2. In exercising the rights referred to in Article 7, the interested party may confer, in writing, a proxy or proxy to individuals, entities, associations or organizations. The interested party can also be assisted by a trusted person.

3. The rights referred to in article 7 referring to personal data concerning deceased persons can be exercised by those who have an interest of their own, or act to protect the interested party or for family reasons worthy of protection.

4. The identity of the interested party is verified on the basis of suitable elements of evaluation, also by means of available deeds or documents or by showing or attaching a copy of an identification document. The person acting on behalf of the interested party exhibits or attaches a copy of the power of attorney, or of the proxy signed in the presence of an appointee or signed and presented together with an unauthenticated photocopy of an identification document of the interested party.

If the interested party is a legal person, an entity or an association, the request is made by the natural person legitimated on the basis of the respective statutes or regulations.

5. The request referred to in article 7, paragraphs 1 and 2, is formulated freely and without constraints and can be renewed, unless there are justified reasons, after not less than ninety days.

Art. 10. Feedback to the interested party

1. To ensure the effective exercise of the rights referred to in Article 7, the data controller is required to adopt suitable measures aimed, in particular:

a) to facilitate access to personal data by the interested party, also through the use of specific computer programs aimed at an accurate selection of data concerning identified or identifiable individual interested parties;

b) to simplify the procedures and reduce the time required for replying to the applicant, also in the context of offices or services responsible for relations with the public.

2. The data are extracted by the manager or persons in charge and can be communicated to the applicant also orally, or offered for viewing by electronic means, provided that in such cases the understanding of the data is easy, also considering the quality and quantity of the data. information. If there is a request, the data is transposed on paper or computerized support, or their transmission electronically.

3. Unless the request refers to a particular treatment or to specific personal data or categories of personal data, the reply to the interested party includes all personal data concerning the interested party however processed by the owner. If the request is addressed to a health professional or to a health organization, the provision referred to in Article 84, paragraph 1 is observed.

4. When the extraction of data is particularly difficult, the response to the request of the interested party can also take place through the exhibition or delivery of copies of deeds and documents containing the personal data requested.

5. The right to obtain the communication of the data in an intelligible form does not concern personal data relating to third parties, unless the breakdown of the data processed or the deprivation of some elements makes the personal data relating to

the interested party incomprehensible.

6. The communication of data is carried out in an intelligible form also through the use of intelligible handwriting. In case of communication of codes or abbreviations, the parameters for understanding their meaning are provided, also through the persons in charge.

7. When, following the request referred to in Article 7, paragraphs 1 and 2, letters a), b) and c), the existence of data concerning the interested party is not confirmed, a fee not exceeding the costs actually incurred for the research carried out in the specific case.

8. The contribution referred to in paragraph 7 cannot in any case exceed the amount determined by the Guarantor with a general provision, which can identify it on a flat-rate basis in relation to the case in which the data are processed by electronic means and the answer is provided orally. With the same provision, the Guarantor can provide that the contribution may be requested when the personal data appear on a special support for which reproduction is specifically requested, or when, with one or more owners, a considerable use of means is determined in relation to the complexity or extent of the requests and the existence of data concerning the interested party is confirmed.

9. The contribution referred to in paragraphs 7 and 8 is also paid by postal or bank transfer, or by payment or credit card, where possible upon receipt of the reply and in any case no later than fifteen days from such reply.

#### Art. 11. Processing methods and data requirements

1. The personal data being processed are:

- a) processed lawfully and fairly;
- b) collected and recorded for specific, explicit and legitimate purposes, and used in other processing operations in terms of compatibility with these purposes;
- c) accurate and, if necessary, updated;
- d) relevant, complete and not excessive in relation to the purposes for which they are collected or subsequently processed;
- e) kept in a form that allows the identification of the data subject for a period of time not exceeding that necessary for the purposes for which they were collected or subsequently processed.

2. Personal data processed in violation of the relevant regulations regarding the processing of personal data cannot be used.

Pursuant to and for the purposes of Articles 37 and ss. of the Regulation, the Data Protection Officer (DPO) will be competent for the processing carried out on the data. You can contact the DPO by sending an email to the following address: [mauro.mail@mail.com](mailto:mauro.mail@mail.com) for the exercise of the rights recognized by the Regulation and from the Code.

**PERIOD OF STORAGE AND CANCELLATION FROM THE SERVICE** Personal data will be deleted in compliance with the provisions of EU Regulation 2016/679 and subsequent amendments.