

**Vuetel Italia Holding Spa** via della Giustiniana 1012 00189 Roma - PIVA 10243231007 pec vuetelitalia@pec.it - info@vuetel.com

## INFORMATION ON THE PROCESSING OF PERSONAL DATA

**Pursuant to articles 13 and 14 of the European Regulation n. 679/2016 and Legislative Decree 196/2003 as amended by Legislative Decree 101/2018**

The European Regulation n. 679/2016 GDPR and the harmonization laws of the Member States, recognize the protection of their personal data that is subject to processing by third parties, as an expression of respect for human dignity and the fundamental rights and freedoms of the person.

Based on the provisions of European and internal regulations in force, the processing of data provided by the interested party (possibly even minor) and / or otherwise acquired by Vuetel Italia Holding Spa, in relation to the same, will be carried out in full compliance with the principles of lawfulness, correctness, relevance, proportionality and transparency and protection of confidentiality, in compliance with the legal requirements.

"Personal Data" means any information concerning an identified or identifiable natural person; for "Interested" the person who owns the data; for "Data Controller" the person, natural or legal, who determines the purposes and means of the processing of personal data; for "Data Processor" the person, natural or legal, who processes data on behalf of the owner; for "Recipient" the person, natural or legal, public authority, service or other body that receives communication of personal data.

Vuetel Italia Holding S.p.A. as a company with purposes for which personal data processing is requested, it provides the interested party with the following information:

The Data Controller is Vuetel Italia Holding S.p.A., with registered office in via della Giustiniana 1012 - 00189 Rome - VAT number 10243231007 - pec vuetelitalia@pec.it - info@vuetel.com.

The data are acquired for the following purposes of the treatment:

1. Browsing and consulting the contents on the institutional website, including filling in the forms (forms) present there, at the address <https://www.vuetel.com/>
2. Contact with the user / interested party in the contractual and pre-contractual phase aimed at fulfilling obligations between the parties consequent to the aforementioned contract in which the interested party is involved;
3. Processing of statistics, in anonymized form;
4. Management of litigation;
5. Any legal obligations or obligations;
6. Information and advertising promotion of commercial initiatives on paper materials or electronic / digital channels owned by Vuetel Italia Holding SPA intended for the public (eg catalogs, brochures,,

posters, websites, blogs, social network pages, newsletters) and / or through direct marketing or newsletter registration; such communications may be made using automated (via e-mail, sms / MMS) or traditional (via fax, paper mail and / or use of the telephone with operator) methods. Marketing also implies the size of analysis and reporting connected to the promotional communication systems, such as, for example, the detection of the number of open e-mails, the clicks made on the links within the communication, the type of device used to read the communication and the related operating system . For the marketing purposes described here, the Data Controller collects a single consent without prejudice to the right of the interested party to oppose the processing, carried out by the means indicated at any time, through a written request addressed to the email address info@vuetel.com

The legal bases of the processing for the purposes in points 1, 2, 3, 4 refer to the fulfillment of the contract of which the interested party is a party involved (art.6.1.b GDPR) and to the legitimate interest (art.6.1.f GDPR ) of Vuetel Italia Holding Spa to maintain an online showcase of its services and to manage litigation.

The legal basis for the purpose in point 5 is the legal obligation (art. 6.1.c GDPR).

For the purpose in point 6) the legal basis of the processing is the explicit consent of the interested party (art. 6.1.a GDPR) to be exercised, in the case of minors, by a parent or by an operator of parental responsibility. Again with reference to the purpose in point 6), the legal basis for sending commercial communications or for direct marketing activities may be, where applicable, the legitimate interest of the owner (art.6.1.f GDPR) to inform interested parties that have provided their email address during previous contractual or pre-contractual terms, on similar contents or activities or services, provided that he does not object to the processing.

In the case of CVs spontaneously sent by the interested party through the form on the site, as established by Legislative Decree no. 101/2018, the information to the interested party pursuant to art. 13 of the European Regulation 2016/679 will be made at the first subsequent useful contact and, within the limits of the purposes established by ll'art. 6, par. 1 letter b) of the same regulatory source, consent to the processing of personal data contained in the CV of the candidate deemed suitable is not required. In the case of a candidate whose profile characteristics do not correspond to Vuetel Spa's needs, his personal data are not further maintained and what is spontaneously shared is immediately deleted from the servers owned by the owner.

The personal data processed are as follows

- personal data (name, surname, residence, tax code, email address, telephone) and billing;
- data sent through interaction with social networks and external platforms (Facebook, Vimeo, Youtube);
- site usage data, automatically acquired by the platforms, such as IP addresses, domain names entering the site, the addresses of the requested resources, the time of the request, the method used in submitting the request to the server , the size of the file obtained, etc. These data are stored in the hosting provider's servers and are processed anonymously, to process aggregate statistics on

the use of the application, to monitor its correct functioning, and to ascertain any responsibility in the event of hypothetical computer crimes against site damage;

- data and metadata relating to the traffic generated through the communication networks provided by the owner;
- **Cookies**: the sites use small text strings that are sent to the user's browser to be then retransmitted to the same sending sites on the next visit by the same user in order to manage their authentication and access profile. During navigation, the user can also receive cookies sent from different websites or web servers (called "third parties") on his terminal, on which some elements (images, maps, links, etc.) present on the site may reside that the user is visiting. The user at the first access has the possibility to give a selective consent to the installation or not of the cookies available based on a Cookie Policy, reachable from the sites themselves, containing all the relevant information to make an informed decision.

The aforementioned data are processed in the following ways:

- processing through information and IT systems, without the use of algorithms with profiling characteristics;

Personal data are not disclosed. Always respecting the principles of proportionality and necessity, and exclusively for the fulfillment of the purposes outlined above, they can be shared with:

- internal operators authorized by the Owner, pursuant to art 29 of European Regulation 679/2016;
- by subjects providing additional services, suitably appointed as Managers pursuant to art. 28;
- by subjects providing additional services, as independent data controllers and only with explicit consent to the communication;
- subjects, entities or authorities to whom it is mandatory to communicate your personal data pursuant to legal provisions or orders from the authorities;

The data are in compliance with technical-organizational measures suitable to guarantee the security of the treatment and the respect of the current regulatory framework.

The data are processed at the Vuetel Italia Holding S.p.A. operating offices. In some cases, for technical reasons, they may be stored on servers located in a country outside the European Union, provided it is deemed adequate to guarantee compliance with the principles enshrined in the Regulation by a decision of the European Commission.

The data acquired for the purposes in points 1,2,3,4 are kept for as long as necessary to guarantee the provision of the service, the fulfillment of the contract and compliance with tax, civil and litigation management regulations.

The data and metadata of telephone and telematic traffic are stored 72 months, to respond to any requests from the Competent Authority for the purpose of suppressing crimes, in accordance with European Law 2017.

The contact data always acquired for the purpose in point 6 through newsletters are kept for 24 months, without prejudice to the possibility of withdrawing your consent even earlier.

The provision of the data being processed is optional but the failure, incorrect, even partial, of the data by the interested party for the purposes of points 1,2,3,4,5 makes it impossible for Vuetel Italia Holding Spa to provide and, for the interested party to use, the service or the contract.

Failure to provide the data in point 6) does not affect in any way the use of the service or the fulfillment of the contract between the parties.

If required by a legal obligation or for police purposes, aimed at the suppression of crimes, personal data may be disclosed to public bodies or to the judicial authority.

The interested party may at any time request and obtain the exercise of their own rights, as provided by the EU Regulation mentioned above through a request addressed to the following mailbox: info@vuetel.com.

In particular:

1. The interested party has the right to obtain confirmation of the existence or not of personal data concerning him, even if not yet registered, and their communication in an intelligible form. The interested party also has the right to obtain confirmation from the Data Controller that personal data concerning him or her is being processed and, in this case, to obtain access to personal data.

2. The interested party has the right to obtain more information on the contents of this statement, in particular the indication:

- the origin of personal data;
- the purposes and methods of treatment;
- the logic applied in case of treatment carried out with the aid of electronic instruments;
- the identity of the owner and managers;
- the subjects or categories of subjects to whom the personal data may be communicated at the time of the provision of the service.

3. The interested party has the right to obtain:

- updating, correction of data;
- cancellation or limitation of data processing that occurs in violation of the law;
- data portability, ie the right to receive data in a structured format and, where applicable, to request its transmission to another owner;
- the communication of the changes to third parties to whom the previous information had been communicated if such communication does not involve a disproportionate effort by the owner.

4. The interested party has the right to object, in whole or in part, to the processing of data concerning him.

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5. The interested party has the right to lodge a complaint with the supervisory authority (Guarantor).