



Moncalieri, 05/03/2021

PRIVACY POLICY

in compliance with the EU general data protection regulation 2016/679 (GDPR)

FEEDBACK ITALIA S.r.l., with registered office in Moncalieri, via J. F. Kennedy n. 10, C.F. and VAT number 07874060010 (hereinafter, "Owner"), as the data controller, informs you pursuant to art. 13 Legislative Decree 30.6.2003 n. 196 (hereinafter, "Privacy Code") and art. 13 EU Regulation no. 2016/679 (hereinafter, "GDPR") that your personal data will be processed in compliance with the principles of lawfulness, correctness, transparency and protection of your privacy, in the following manner and for the following purposes:

1. Object of the Treatment

Feedback Italia processes personal, identification data (for example, name, surname, company name, address, telephone number, e-mail address, bank and payment details) - hereinafter, "personal data" or even "data" communicated by you voluntarily and / or at the start of pre-contractual negotiations and / or the conclusion of contracts.

2. Purpose of the processing

Your personal data will be processed, with your consent where necessary, for the following purposes, where applicable:

- i. allow the performance of the service and the provision of the Feedback Italia service;
- ii. find specific requests, including telephone requests, addressed to Feedback Italia;
- iii. fulfill any obligations established by applicable laws, regulations or community legislation, or satisfy requests from the authorities;
- iv. exercise the rights of the owner;
- v. fulfill contractual and pre-contractual obligations deriving from existing relationships with you;
- vi. for statistical purposes, without it being possible to trace your identity.

Your personal data will be processed with the support of IT, paper or telematic means.

Specific security measures are observed to prevent data loss, illicit or incorrect use and unauthorized access.

3. Processing methods

The processing of your personal data is carried out by carrying out the operations indicated in art. 4 of the Privacy Code and art. 4 n. 2) GDPR and more precisely: collection, registration, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, cancellation and destruction of data. Your personal data are subjected to both paper and electronic and / or automated processing.

The Data Controller will process personal data for the time necessary to fulfill the aforementioned purposes and, in any case, for at least 10 years from the termination of the relationship unless otherwise regulated by current legislation, for the possible exercise of the rights connected to the concluded contracts.

4. Access to data

Your data may be made accessible, with a guarantee of protection of your rights, for the purposes referred to in art. 2.:

- to employees and collaborators of the Data Controller, in their capacity as persons in charge and / or internal managers of the processing and / or system administrators belonging to the commercial, administrative, IT area, staff and management offices.

- to third-party companies or other subjects (purely indicative and not exhaustive, credit institutions, professional firms, consultants, insurance companies for the provision of insurance services, etc.) who carry out outsourced activities on behalf of the Data Controller, in their quality of external data processors.

5. Communication of data

Without the need for express consent (pursuant to Article 24 letter a), b), d) Privacy Code and art. 6 lett. b) and c) GDPR), we may communicate your data for the purposes referred to in art. 2. to Supervisory Bodies, Judicial Authorities, to insurance companies for the provision of insurance services, as well as to those subjects to whom the communication is mandatory by law for the accomplishment of the aforementioned purposes.

These subjects will process the data in their capacity as independent data controllers.

Your information will not be disseminated.

6. Data transfer

Personal data is stored on servers located within the European Union.

In any case, it is understood that the Data Controller, if necessary, will have the right to move the servers even outside the EU. In this case, the Data Controller ensures from now on that the transfer of non-EU data will take place in accordance with the applicable legal provisions, subject to the stipulation of the standard contractual clauses provided for by the European Commission.

7. Nature of the provision of data and consequences of refusing to respond

The provision of data for the purposes referred to in art. 2. is mandatory. In their absence, we will not be able to guarantee the correct performance of the activities referred to in art. 2.

8. Rights of the interested party

In your capacity as an interested party, you have the rights referred to in art. 7 of the Privacy Code and art. 15 GDPR and precisely the following rights:

- i. obtain confirmation of the existence or not of personal data concerning you, even if not yet registered, and their communication in an intelligible form;
- ii. obtain the indication: a) of 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 pursuant to art. 5, paragraph 2 of the Privacy Code and art. 3, paragraph 1, GDPR; 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;
- iii. 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;
- iv. object, in whole or in part, for legitimate reasons, to the processing of personal data concerning you, even if pertinent to the purpose of the collection.

Where applicable, it also has the rights referred to in Articles. 16-22 of the GDPR, namely the right of rectification, the right to be forgotten, the right to limitation of processing, the right to data portability, the right to object, as well as the right to complain to the Guarantor Authority.

9. How to exercise the rights

You can exercise your rights at any time by sending:

- registered mail with return receipt to the Data Controller.
- a communication to the email address privacy@feedbackitalia.it

10. Owner, manager and appointees

The Data Controller is FEEDBACK ITALIA S.r.l., with registered office in Moncalieri (TO), via J. F. Kennedy n. 10. The updated list of data processors and persons in charge of processing is kept at the registered office of the Data Controller.