

ANNEX III

DATA PROCESSING SHEET

Special conditions under the General Agreement on Personal Data Processing

Article 28 Reg. EU 2018/679 ('GDPR')

Between

The **Data Controller**, as identified in the Agreement, represented by its legal representative vested with the necessary powers,

and

The **Data Processor**, as identified in the Agreement, represented by its legal representative vested with the necessary powers,

Furthermore, the Controller and Processor may be jointly referred to as '**Parties**' and individually as '**Party**'.

WHEREAS

- I. The Parties have signed the Main Agreement on Personal Data Processing ("Agreement"), which governs the terms and methods of personal data processing carried out by the Processor in the context of providing the Services covered by the Contract;
- II. Pursuant to the aforementioned Agreement, the processing of personal data related to the provision of specific Services is governed through Data Processing Sheets that define the operational characteristics, categories of data processed, purposes, security measures applied, and any involvement of Sub-Processors;
- III. This Data Processing Sheet specifies the details of the Service in accordance with the Agreement. It integrates and completes the general provisions of the Agreement, constituting an integral and binding part between the Parties;
- IV. In case of conflict between the provisions of this Data Processing Sheet and those of the Agreement, the provisions of the Agreement shall prevail, unless the Data Processing Sheet expressly provides for agreed exceptions between the Parties;
- V. For matters not expressly provided for herein, the provisions and definitions set forth in the Agreement and the Contract shall apply, which are hereby fully incorporated by reference.

Having stated all of the above, the Parties present, in the following table, the specifications of the Personal Data processing related to the Service, including information on purposes, categories of data processed, applied security measures, and any other relevant detail for the purposes of the Agreement.

	DESCRIZIONE
SERVICE	CA Aggregation for SPID Authentication
NATURE OF THE PROCESSING	The Processor may process the Client's Personal Data acquired in the context of providing support and maintenance activities, within the limits strictly necessary for the performance of the services under the Contract, in terms of: collection, recording, organization or structuring, consultation, selection, deletion, or destruction.



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PURPOSE OF THE PROCESSING	<ul style="list-style-type: none"> • Conclusion of the Contract and execution of the services covered by the Contract. • Furthermore, the aggregating entity processes data relating to criminal convictions and offenses concerning the legal representative, the person responsible for administration, or a member of the supervisory body of private entities providing services: <ol style="list-style-type: none"> 1. in compliance with Article 10 of the GDPR and Articles 2-octies and, where applicable, 2-sexies of Legislative Decree no. 196 of 30 June 2003, as amended (hereinafter, the "Privacy Code"): <ol style="list-style-type: none"> a. on the legal basis established by Article 15, paragraph 1 of the DPCM and by this Regulation, pursuant to Article 2-octies, paragraphs 1 and 3, letter c) of the Privacy Code; b. under the supervision of AgID, in accordance with Article 4, paragraph 1, letter b) of the DPCM and pursuant to Articles 2-octies, paragraph 5 and 2-sexies, paragraph 1 of the Privacy Code.
METHOD OF DELIVERY	<i>Cloud SaaS</i>
CATEGORIES OF DATA SUBJECTS	<ul style="list-style-type: none"> • End customers; • Service users.
CATEGORIES OF PERSONAL DATA PROCESSED	<p>The Personal Data processed by the Processor on behalf of the Controller belongs to the following categories:</p> <p>COMMON DATA:</p> <ul style="list-style-type: none"> • Personal data (name, surname, date of birth, place of birth, nationality, gender, tax code, residence/domicile address); • Contact data (email, phone number); • Browsing data (IP address) • SAML Assertion (This is the XML document containing the data that confirms to the service provider that the authentication of the user attempting to access the service has been successfully completed).
DATA STORAGE LOCATION	<p>The data are stored on the servers of the Processor and/or Sub-Processors located within the European Union/EEA.</p>
DURATION OF PERSONAL DATA PROCESSING	<p>The processing of Personal Data for the purpose of providing the Services shall have the following duration: the entire duration of the Contract with the Controller; or the entire duration of the Agreement with the Controller if, for any reason, it exceeds the duration of the Contract.</p> <p>After the expiry of the aforementioned periods, the Processor shall be permitted to retain the Personal Data further only to the extent</p>



	<p>that such retention constitutes compliance with specific legal obligations or orders from competent Authorities.</p> <p>The retention of Personal Data is also permitted solely to the extent that such data are necessary for the Processor to establish, exercise, or defend a legal claim, for a maximum period of 10 years.</p>
SECURITY MEASURES	<p>Ref. Annex II - Technical and Organizational Security Measures related to the Agreement.</p>
SUB-PROCESSORS	<p>The Processor makes use, for the purpose of carrying out processing activities related to the provision of the Service, of other companies within the Namirial Group and of selected third parties that offer data confidentiality guarantees.</p> <p>Some of these third parties may operate outside the European Economic Area (EEA), including the United States.</p> <p>To ensure compliance with the GDPR (Articles 44–49) and data protection regulations, the Provider may use appropriate data transfer mechanisms.</p> <p>These parties are selected in accordance with the provisions set out in the Agreement, receive specific instructions on data processing, and carry out only the activities necessary in compliance with the provided guidelines.</p> <p>The updated list of these entities is provided in Annex III A of this document.</p>



ANNEX III - A

SUB-PROCESSORS

This Annex lists the approved Sub-Processors as of the date of signing the relevant Data Processing Sheet, pursuant to the Agreement.

The listed entities have been selected based on criteria of experience, reliability, and compliance guarantees with applicable regulations, particularly the provisions of Article 28 of EU Regulation 2016/679.

They operate under the authority of the Processor, adhering to the instructions received and adopting adequate security measures for the protection of the processed Personal Data.

The list of Sub-Processors may be updated over time in accordance with the provisions of the Agreement.

COMPANY NAME	ADDRESS	PROCESSING LOCATION	ACTIVITY SCOPE
AWS EMEA SARL	Luxembourg, 38 Avenue John F. Kennedy L-1855	EEA	Data storage
Atlassian B.V.	Amsterdam, Singel 236 1016 AB Amsterdam, Netherlands	EEA	Support ticket management
Zendesk Inc.	989 Market St, San Francisco, CA 94103	EEA	Support ticket management
Exalate NV	Roderveldlaan 2 bus 3, 2600 Berchem, Belgium	EEA	Synchronization of support tickets
Yarix S.r.l.	Montebelluna (TV), Vicolo Boccacavalla n. 12, 31044	EEA	SOC (Security Operation Center) and MOC (Monitoring Operation Center)