







NOTICE ON PERSONAL DATA PROTECTION

Pursuant to Article 13 of EU Regulation 2016/679

Namirial S.p.A. processes personal data in compliance with the provisions set forth in European Regulation No. 679/2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter the "Regulation").

Pursuant to art. 13 of the above-mentioned Regulation, information is provided below regarding the identification data of the data controller and information relating to the processing of your personal data in relation to contracts and the provision of certified services (Digital Signature, SPID, PEC), hereinafter the "Services".

Data controller		The data controller is Namirial S.p.A. (hereinafter, " Namirial " or " Data controller "), with registered office in Via Caduti sul Lavoro, 4 - 60019 Senigallia (AN), VAT number IT 02046570426. The Data Protection Officer (DPO) can be reached at the following e-mail address: dpo@namirial.com .
Type of data processed		As part of the Services that Namirial will provide to you, we will process the following categories of personal data: <ul style="list-style-type: none"> - Biographical data (first name, last name, social security number, gender, date of birth, place of birth, nationality); - Details and copy of the identity document and the health card/tax code; - Address data (residence/domicile); - Contact details (telephone number and e-mail address); - Biometric data (physical, physiological or behavioral characteristics collected through photo/video recognition); - Browsing and Log data (IP, connection data, domain names and other parameters related to the operating system and browser you are using); - Payment data (IBAN and bank/postal details).
Purpose and legal basis of the processing		We will process your data for the following purposes: <ol style="list-style-type: none"> Conclusion of contract and use of services: the legal basis for this purpose is Article 6(1)(b) of the GDPR - Contract; Verification of the identity of the data subject through photo/video recognition: the legal basis for this purpose is art. 9(2)(a) - Consent; Handling and response to requests for technical assistance, including online: the legal basis for this purpose is Art. 6(1)(b) of the GDPR - Contract; Compliance with legal, national or EU regulatory obligations: the legal basis for this purpose is Art. 6(1)(c) of the GDPR - Legal obligation; Sending information content: the legal basis for this purpose is Article 6(1)(f) of the GDPR - Legitimate interest of the Data controller; Statistical, business and market analyses, carried out in an absolutely anonymous and aggregated form: the legal basis for this purpose is Art. 6(1)(f) of the GDPR - Legitimate interest of the Data controller; Jurisdictional protection of Namirial rights: the legal basis for this purpose is Article 6(1)(f) of the GDPR - Legitimate interest of the Data controller; Prevention of fraudulent activities by performing a reliability check on the data provided by the data subject during identification: the legal basis for this purpose is Article 6(1)(f) of the GDPR - Legitimate interest of the Data controller.
Provision of data		The provision of the data referred to at points (a), (b), (c), (d), (g), and (h) is mandatory to allow for the conclusion of the contract or for the provision of the requested services. The provision of the data referred to in the further points is optional: you may at any time ask the Data controller to stop the processing activities without any consequences in the scope of the services provided to you.
Method of processing and access to data		Namirial processes personal data in accordance with the principles of the Regulation and by virtue of its legitimate interests regarding the type of activity carried out and the need to fulfil current contracts or pre-contractual measures requested by the data subjects. The data collected through the signing of standard contracts in analog format are processed both in paper form and with computer and telematic tools and may be processed in aggregate form for statistical findings and verification of the quality standards of support and maintenance services, excluding in this case the processing of identification data. The data collected by filling in online forms are processed electronically and may be subject to automated processing using information systems of a managerial nature. The data are accessible exclusively to persons in charge, adequately trained and informed about their duties and the activities allowed to them on the data collected, who work on behalf of Namirial and are the recipients of specific instructions and tasks, by letter of appointment. The Data controller will process data for the above purposes by pursuing its legitimate interests that do not override the interests or rights and freedoms of the data subject.
Place of processing and transfer abroad		Your personal data will be processed at the Data controller's servers located within the European Union. If, in order to enable the performance of the services you have requested, it is necessary to transfer data outside the European Economic Area, the transfer will take place in one of the ways permitted by applicable law. In this case, protection and security obligations equivalent to those guaranteed by the Data controller will be imposed on the data recipients.



Namirial S.p.A.

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Fiscal Code and number of registration with the Companies' Register of Ancona No. 02046570426 |

REA No. AN - 157295



Scope of disclosure and dissemination of data



Please note that personal data processed in accordance with this policy may be disclosed to third parties appointed as external data processors (the complete list is available at the Data Controller), commercial consultants for administrative and accounting purposes, as well as to legal consultants for the management of possible disputes.

We also inform you that the data may also be communicated to police or judicial authorities for the purpose of investigating or prosecuting crimes committed by users of telematic services, where necessary.

We also inform you that data may also be processed by third parties acting as Local Registration Authority (LRA) or Registration Authority Operator (RAO), as defined within the general conditions of service, or by individuals with paper and/or digital management and archiving functions, formally appointed by Namirial as external data processors/sub-processors.

Retention and erasure of personal data



Namirial will retain your data in a form that allows it to be identified for a period of time not exceeding the fulfillment of the purposes stated in this policy.

Data related to the Digital Signature and/or SPID, even where collected through the audio-video recording system, will be retained for 20 (twenty) years from the expiration or revocation of the Digital Signature and/or SPID, in accordance with the provisions of Legislative Decree 82/2005 as amended (Digital Administration Code) and the Prime Minister's Decree of October 24, 2014, as amended.

The browsing data of the sites through which the type of access is requested through the user's SPID credentials and the user's own data will be retained for a period of 2 (two) years starting from the performance of such operations.

In relation to the Certified Electronic Mail (PEC) service, including the REM (Registered Electronic Mail) service:

- master data of the data subject, any documents and/or identification data collected through the audio-video recording system shall be kept for 10 (ten) years from the end of the contract;
- the logs of the PEC messages and the logs of the PEC messages with viruses are kept for 30 (thirty) months, as required by current legislation on the subject;
- data on accesses to the PEC by the Data controller are kept for 6 (six) months.

Data strictly necessary for fixing and accounting purposes, the purpose for which they were collected having ceased to exist, will be retained for a period of ten (10) years as required by relevant regulations.

Service logs related to Digital Signature, SPID, PEC will be retained for a period of six (6) months to ensure proper identification of service flows.

Once these periods have elapsed, the data of the data subjects will be deleted or transformed into anonymous form, unless their further storage is necessary to comply with legal obligations or to fulfill requests from authorities.

Please be advised that you have the right to request, at any time, changes in the arrangements governed by this policy through the exercise of the rights set forth in the following paragraph.

Rights of data subjects



Please be advised that you may exercise the rights referred to in art. 15 (Right of access by the data subject), 16 (Right to rectification), 17 (Right to erasure), 18 (Right to restriction of processing), 19 (Right to receive the notification from the controller regarding rectification or erasure of personal data or restriction of processing), 20 (Right to data portability), 21 (Right to object) and 22 (Right to reject the automated processing) of Regulation.

Please note that the exercise of the rights referred to in the above articles, such as the right to erasure or opposition, meets the limits imposed by the regulations applicable to the services with regard to personal data retention obligations.

To exercise the rights under Articles 15 to 22 of the Regulation, you should address your request in writing to:

Namirial S.p.A., Via Caduti sul Lavoro n. 4 - 60019 Senigallia (AN)

dpo@namirial.com - dpo.namirial@sicurezzapostale.it



We inform you that you also have the right to file a complaint with the Data Protection Authority.