


INFORMATION ON THE PROCESSING OF PERSONAL DATA


pursuant to Article 13 of Regulation (EU) 2016/679

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


Pursuant to Article 13 of the aforementioned Regulation, the following information is provided regarding the identification data of the data controller and the information related to the processing of personal data of each client and supplier (hereinafter the "data subject") within the framework of contractual relationships and/or the execution of pre-contractual measures.

Data Controller  The Data Controller is Namirial S.p.A. (hereinafter, "Namirial" or "Controller"), with registered office at Via Caduti sul Lavoro, 4 - 60019 Senigallia (AN), VAT IT 02046570426.


The Data Protection Officer (DPO) can be reached at the following email address: dpo@namirial.com.


Types of Data Processed  Within the framework of contractual relationships and/or the execution of pre-contractual measures with the data subject, the Controller may process, depending on the purposes, the following categories of personal data:

- Personal data (name, surname, tax code, gender, date of birth, place of birth, nationality);
- Details and copy of the identity document and health card/tax code;
- Address data (residence/domicile);
- Contact data (telephone number and email address);
- Payment data (IBAN and bank/postal data).
- Additional data, voluntarily provided by the data subject.

Purposes and Legal Basis of Processing  We will process your data for the following purposes:

- a. Conclusion of the contract or execution of pre-contractual measures: the legal basis for this purpose is Article 6(1) b of the GDPR - Contract;
- b. Management and response to technical assistance requests, including online: the legal basis for this purpose is Article 6(1) b of the GDPR - Contract;
- c. Management and response to technical support requests, including through an artificial intelligence system: the legal basis for this purpose is Article 6(1) b of the GDPR - Contract;
- d. Improvement of the quality of technical support services, analysis, and training activities of algorithms aimed at optimizing responses and the knowledge base: the legal basis for this purpose is Art. 6(1)(f) of the GDPR - Legitimate interest of the Controller;
- e. Compliance with national or EU legal and regulatory obligations: the legal basis for this purpose is Article 6(1) c of the GDPR - Legal obligation;
- f. Verification of suppliers' compliance with compliance and anti-corruption requirements, in accordance with the Controller's internal policies, to prevent risks related to corrupt practices: the legal basis for this purpose is Article 6(1) f of the GDPR - Legitimate interest of the Controller;
- g. Sending information content on services similar to those already purchased: the legal basis for this purpose is Article 6(1) f of the GDPR - Legitimate interest of the Controller;
- h. Statistical, business, and market analysis, carried out in an absolutely anonymous and aggregated form: the legal basis for this purpose is Article 6(1) f of the GDPR - Legitimate interest of the Controller;
- i. Judicial protection of Namirial's rights: the legal basis for this purpose is Article 6(1) f of the GDPR - Legitimate interest of the Controller;
- j. Promotional and marketing activities of the Controller: the legal basis for this purpose is Article 6(1) a of the GDPR - Consent.

Data Provision  The provision of data referred to in points a), b), e), f), and i) is mandatory to allow the conclusion of the contract or the provision of the requested services. The provision of data referred to in the additional points is optional: you can at any time ask the Controller to stop processing activities without any consequence on the services provided to you.

Processing Methods and Data Access  Namirial processes personal data in accordance with the principles of the Regulation and by virtue of its legitimate interests related to the type of activity carried out and the need to execute existing contracts or pre-contractual measures requested by the data subjects.

The data collected through the subscription of standard contracts in analog format are processed both in paper form and with IT and telematic tools and may be processed in aggregated form for statistical purposes and verification of the quality standards of assistance and maintenance services, excluding in this case the processing of identifying data.

The data collected through the completion of online forms are processed electronically and may be subject to automated processing through management information systems.

The data are accessible exclusively by appointed personnel, adequately trained and informed about their tasks and activities allowed on the collected data, who operate on behalf of Namirial and are recipients of specific instructions and tasks, by means of a letter of appointment.

The Controller will process the data for the above-mentioned purposes pursuing its legitimate interests that do not override the interests or rights and freedoms of the data subject.

The data used by the Controller's artificial intelligence system for technical support purposes are processed using a Retrieval-Augmented Generation (RAG) architecture. The system relies on cloud and third-party components (e.g., AWS



Namirial S.p.A.

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Bedrock). Before indexing for semantic search, pseudonymization techniques are applied where possible; additional technical measures are also implemented, such as encryption, least-privilege access control, logging/auditing, and separation of development and production environments. The responses and suggestions generated by the artificial intelligence system are subject to human review before any decision that could affect the data subject's rights is made.

Place of Processing and Transfer Abroad



Your personal data will be processed at the Controller's servers located within the European Union. If, to allow the execution of the services requested by you, it is necessary to transfer the data outside the European Economic Area, the transfer will take place according to one of the methods allowed by the current law. In such cases, the recipients of the data will be imposed protection and security obligations equivalent to those guaranteed by the Controller.

Scope of Communication and Possible Dissemination



The data of clients and suppliers may be communicated to public administrations or public service providers when submitting applications to participate in procedures for the selection of the contractor, for the purpose of awarding contracts or concessions for the supply of goods or services, as provided by the regulations on public procurement, for technical qualification purposes.

We inform you that the personal data processed in accordance with this information may be communicated to the companies belonging to the Controller's group as well as to third parties appointed as external data processors (the complete list is available at the Controller), commercial consultants for administrative and accounting purposes, as well as legal consultants for possible management of disputes.

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

The data may be communicated to those (private or public administration), even outside the European Union, in their legitimate interest and benefiting from a right expressly attributed to them by the specific legislation in force, who request verification of the identity of the service provider by Namirial Sa for investigative purposes or otherwise for the protection of their legitimate interest.

The data are not subject to dissemination, except for the data of companies and corporations for commercial reference purposes.

Retention and Deletion of Personal Data



Namirial will retain the data of the data subjects in a form that allows their identification for a period not exceeding the achievement of the purposes for which the data were collected.

The data strictly necessary for contractual, fiscal, and accounting obligations, once the purpose for which they were collected has ceased, will be retained for a period of 10 (ten) years from the expiration of the contract, as required by the regulations in the matter.

Tickets indexed by the artificial intelligence system for the RAG engine are retained for 24 months from the resolution date; after 24 months they are moved to an archive collection excluded from retrieval and stored for an additional 5 years, after which they are deleted or rendered irreversibly pseudonymized.

The data collected for marketing purposes are retained until the consent of the data subject is revoked.

After these periods, Namirial will proceed with the deletion of the data of the data subject.

Rights of Data Subjects



We inform you that you may exercise the rights provided by Articles 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 notification from the controller in cases of rectification or erasure of personal data or restriction of processing), 20 (Right to data portability), 21 (Right to object) and 22 (Right to refuse automated processing) of the Regulation.

We inform you that the exercise of the rights provided by the aforementioned articles, such as the right to erasure or objection, encounters the limits imposed by the applicable regulations on services regarding the obligations to retain personal data.

To exercise the rights provided by Articles 15 to 22 of the Regulation, you can send a written request addressed 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 lodge a complaint with the Data Protection Authority.