Privacy Notice

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

Reference Legislation

- Regulation (EU) No. 679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (the "EU Regulation").

- Legislative Decree No. 196 of 30 June 2003 (the "Privacy Code"), as amended by Legislative Decree No. 101 of 10 August 2018 and subsequent amendments and additions.

- Recommendation No. 2 of 17 May 2001 on certain minimum requirements for collecting personal data online in the European Union, adopted by the European data protection authorities meeting as the Working Party established under Article 29 of Directive 95/46/EC (the "Article 29 Working Party Recommendation").

Contents

Reference Legislation	1
1 - Personal Data Subject to Processing	3
2 - Purposes and Legal Basis for Processing Personal Data	4
3 - Nature of the Provision of Personal Data	4
4 - Processing Methods and Data Retention Period	4
5 - Recipients of Personal Data	5
6 - Data Subject Rights under Articles 15, 16, 17, 18, 20 and 21 of the EU Regulation	5
7 - How to Contact the DPO	6

SimpleCyb S.r.l. (Italian tax code / VAT No. 07382220486, the "Company"), with registered office at via Strasburgo 18/A, Parma, informs users of the methods and conditions applied by the Company when processing personal data, and that such personal data will be processed in accordance with the EU Regulation.

In particular, this notice concerns the personal data of users who browse and use the Company's website at: www.simplecyb.com.

SimpleCyb acts as "Controller", meaning "the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data".

Personal data may be processed by persons specifically authorised to process users' personal data and duly instructed by SimpleCyb for that purpose.

Under personal data protection legislation, users who browse and use the Company's website are "data subjects", meaning the natural persons to whom the personal data being processed relates, namely all persons acting in the name and on behalf of a legal entity that is a SimpleCyb Customer and whose personal data is processed by SimpleCyb.

This notice does not extend to other websites that users may visit through links, including Social Buttons, on the Company's website.

By clicking these links, users may access the Company's social media accounts.

The operators of the social networks linked through the Social Buttons act as independent Controllers. Information on how those Controllers process users' personal data is therefore available on the relevant social network platforms.

1 - Personal Data Subject to Processing

In connection with users' interaction with this website, the Company may process the following personal data:

a) Browsing data: during normal operation, the IT systems and software procedures used to operate this website acquire certain personal data whose transmission is implicit in the use of Internet communication protocols. Such information is not collected to be associated with identified data subjects, but, by its nature, could enable users to be identified through processing and association with personal data held by third parties. This category includes IP addresses or domain names of computers used by users connecting to the website; URI (Uniform Resource Identifier) addresses of requested resources; the time of the request; the method used to submit the request to the server; the size of the file returned; the numerical code indicating the server response status (success, error, etc.); and other parameters relating to the user's operating system and IT environment. This personal data is used solely to obtain anonymous statistics on website use and to check that it functions correctly.

Browsing data is not retained for more than (12 months), without prejudice to any need for judicial authorities to investigate offences.

b) Personal data provided voluntarily: the optional, explicit and voluntary transmission of personal data to the Company by completing forms on the website entails collection of the email address and any further personal data requested by the Company to respond to specific requests.

2 - Purposes and Legal Basis for Processing Personal Data

SimpleCyb collects and processes personal data for the following purposes:

a) performing pre-contractual activities and obtaining preliminary information for entering into a contract;
b) performing contractual obligations (for example, administration, accounting, contract management and invoicing/payment services);
c) managing the relationship between you and SimpleCyb (for example, managing disputes or receivables arising from a contract and/or ancillary documents, etc.);
d) carrying out marketing and commercial promotion of services and products marketed by SimpleCyb; this requires your prior, freely given, specific and express consent.

For the purposes under points (a), (b) and (c), processing is carried out to fulfil contractual/pre-contractual obligations and legal obligations connected with the relationship established with SimpleCyb. Your consent is therefore not required.

For the purposes under points (d) and (e), processing is based on freely given, specific and express consent.

3 - Nature of the Provision of Personal Data

Providing personal data is mandatory where there is a legal or contractual obligation to provide it; provision of personal data necessary for pre-contractual requirements is also mandatory. Refusal to provide such "mandatory" personal data may prevent performance of the contract. Refusal to provide personal data strictly connected with performance of contractual relationships, but for which there is no obligation to provide it, will in principle have no consequence other than a possible inability to perform operations connected with that data or to establish new relationships. Refusal to provide personal data relating to the activities under point 1, letters (d) and (e), of this notice may only prevent those additional activities, without affecting contractual relationships.

4 - Processing Methods and Data Retention Period

Personal data will be processed lawfully and fairly and in accordance with applicable legislation, using means capable of ensuring its security and confidentiality. Processing will mainly use IT tools to store, manage and transmit the data.

Processing will mainly be carried out within the Controller's internal organisation under the direction and supervision of the relevant corporate functions, or by personnel specifically appointed for that purpose.

For further parties that may process data subjects' personal data, please refer to point 4 of this notice.

Personal data will be retained in a form allowing identification of data subjects for no longer than necessary for the purposes for which it is collected and processed.

In particular, for management of the contractual relationship, personal data will be retained for the periods defined by relevant legislation and, after termination of the contractual relationship, for ten years solely for data subject to civil-law retention requirements. Where the requested optional consent has been given for marketing and commercial promotion, the data collected will be retained only for the time strictly necessary to fulfil the purposes above, according to criteria based on compliance with applicable laws, fairness and a balance between the Controller's legitimate interests and the data subject's rights and freedoms.

Accordingly, where no specific laws prescribe different retention periods, the Controller will use personal data for the marketing and commercial promotion purposes above for a period proportionate to the interest shown by the data subject in the Controller's initiatives. In any event, the Controller will take every precaution to avoid indefinite use of personal data, periodically verifying, by appropriate means, that the data subject remains interested in processing for marketing and commercial promotion as described above.

5 - Recipients of Personal Data

SimpleCyb may disclose data subjects' personal data where required by law, regulation or EU legislation.

Disclosure, including simply allowing consultation of or making personal data available, may also be made to:

a) bodies, supervisory bodies, authorities or public institutions;
b) natural or legal persons providing specific services, such as data processing, customer satisfaction surveys, administrative, tax and/or accounting consultancy, and organisation of trade fairs and communication events;
c) commercial intermediaries, banks and credit institutions, legal consultancy firms, financial brokerage companies, natural or legal persons responsible for debt collection, auditing and/or certification of financial statements and quality systems, independent SimpleCyb contractors, agents and business introducers, insurers and brokers;
d) natural and/or legal persons requesting references/data for participation in public tenders or in connection with SimpleCyb's performance of supply contracts for customers.

The parties under points (a), (c) and (d) act as independent Controllers.
The parties under point (b) act as specifically appointed Processors.

In all cases, only personal data necessary and relevant to the purposes stated in this notice is transferred to the parties concerned.

The list of these third parties will be continually updated and made available upon request to SimpleCyb.

Where necessary to perform contractual relationships, personal data may be transferred to third countries outside the EU or European Economic Area on the basis of European Commission adequacy decisions, duly adopted standard contractual clauses or specifically authorised binding corporate rules.

Personal data will not be disseminated and will therefore not be disclosed to the public or an indefinite number of persons.

6 - Data Subject Rights under Articles 15, 16, 17, 18, 20 and 21 of the EU Regulation

Each data subject may exercise the right of access to personal data under Article 15 of the EU Regulation and the rights under Articles 16, 17, 18 and 21 of that Regulation concerning rectification, erasure, restriction, portability and objection to the processing of personal data.

You may exercise your rights by writing to: info@simplecyb.com.

If SimpleCyb does not respond to a data subject's request within the statutory time limits, or its response to the exercise of rights is inadequate, the data subject may lodge a complaint with the Italian Data Protection Authority (Garante per la protezione dei dati personali).

7 - How to Contact the DPO

You may contact the Data Protection Officer (DPO) appointed by the Controller regarding any matter relating to the processing of your personal data and the exercise of your rights under the GDPR by writing to: compliance@sesa.it.