

Dear Client

## Information pursuant to Art. 13 of EU Regulation 2016/679 for the Processing of customers' Personal Data

### Data controller

You are informed that, pursuant to EU Regulation 2016/679 (hereafter "**Regulation**"), your Personal Data shall be processed by **SIMPRO S.p.A.** acting as the data controller ("**Controller**").

### Types of data processed

The Controller shall process your personal data (Art. 4(1)), collected within the scope of the contract and/or for the purpose of concluding it with **the Customer**, including, but not limited to, your name, surname, mobile telephone number, email address and, generally, your contact details as a point of reference for the Customer.

### Objective, legal basis and opt-in nature of the processing

Your personal data shall be processed for the following **reasons**:

- a) execution of the contract and/or precontractual elements

The **legal bases** for this processing is the execution of a contract to which the interested party is a subject, or the execution of precontractual elements required by the same (Art. 6(1)(b) of the Regulation)

- b) for the fulfilment of any legal obligations

The **legal bases** for this processing is the fulfilment of the Controller's legal obligation (Art. 6(1)(b) of the Regulation)

- c) regarding reliability and solvency

The **legal bases** for this processing refers to the pursuit of the legitimate interests of the Controller in charge of administrative and financial management (Art. 6(1)(f) of the Regulation)

- d) regarding the management of litigations

The **legal bases** for this processing refers to the pursuit of the legitimate interests of the Controller in defending administrative and judicial rights (Art. 6(1)(f) of the Regulation)

The provision of your personal data for the purposes mentioned above is optional but, in its absence, the execution of the contract shall not be possible.

Your personal data shall also be processed, without your express consent, for the following reasons:

- e) sending promotional or marketing materials regarding products or services similar to those entailed by the contract through the use of your email details, in accordance with the General Provisions of the Authority for Protection of Personal Data “Guidelines on Marketing and Against Spam” of 4 July 2013.

The **legal bases** for this processing is the execution of a contract to which the interested party is a subject (Art. 6(1)(b) of the Regulation).

The provision of your Personal Data for the purpose referred to in this letter is optional; there are no consequences in the event of your refusal.

## Recipients and transmission of personal data

Your Personal Data shall be shared with:

- Natural persons authorised by the Controller to process personal data after a confidentiality agreement has been signed (e.g. employees and system administrators of SIMPRO S.p.A.);
- Consultants and credit institutions for accounting and administrative functions, companies belonging to the Group, contracted companies in the event of outsourced work, even partial, and external companies, some of which act in the role of data controllers (For the complete and up-to-date list of managers, write to [privacy@simpronet.com](mailto:privacy@simpronet.com));
- subjects, bodies or authorities to whom your Personal Data must be communicated, pursuant to the provisions of laws or the orders of authorities.

In terms of potential transmission of Data to Third Countries, the Controller declares that the processing will take place in accordance with the methods permitted by the applicable laws, such as the consent of the interested party, the adoption of Standard Clauses approved by the European Commission, the selection of subjects that comply with international programmes for the free circulation of data (e.g. EU-USA Privacy Shield)

or operating in those Countries that are considered to be safe by the European Commission. More information can be obtained, upon request, from the Controller by the above-mentioned contacts.

### Storage of personal data

Your Personal Data shall be stored only for the time necessary to carry out the purposes for which it was collected, with respect to the principle of minimalisation referenced in Article 5, paragraph 1, letter c) of the GDPR. In all cases, your personal data shall be stored for the time necessary for the execution of the terms contained in the contract. In all cases, further conservation is carried out in accordance with the provisions of the applicable regulation, including the provisions of Art. 2946 of the Civil Code. Further information can be obtained from the Controller.

### Your privacy rights (according to Art. 15 and following of the Regulation)

You have the right to ask the Controller, at any time, for access to your Personal Data, to rectify or delete it or to oppose its processing; you shall have the right to request its processing being limited, or to obtain, in a structured format that is commonly used and readable by an automatic device, the data relating to it, in the cases provided for by Art. 20 of the Regulation.

We also inform you that you have the right, in accordance with Art. 21 of the Regulation, to oppose, for legitimate reasons, the processing of data, from the beginning or in the event of subsequent communications regarding said processing.

Requests should be sent to the Data Controller in writing at the following address. [privacy@simpronet.com](mailto:privacy@simpronet.com).

In all cases, You always have the right to complain to the competent supervisory authority (Authority for the Protection of Personal Data), pursuant to Art. 77 of the Regulation, should You believe that the processing of Your data has been carried out contrary to the regulations in effect.

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