

PRIVACY POLICY

as per art. 13 Regulation (UE) 2016/679 ("GDPR") and D.Lgs. n. 196/2003 s.a.

1. DATA CONTROLLER

GeneSYS Informatica S.r.l., with registered address in Molo ponte Morosini 41, 16126 Genoa in the person of its *pro-tempore* legal representative, is the data controller of your personal data ("the Controller" or "GeneSYS Informatica S.r.l.")

2. DEFINITION OF PERSONAL DATA AND INFORMATION ABOUT TREATMENT ACTIVITIES

As per GDPR, personal data means: "any information concerning an identified or identifiable natural person; an individual is identified as identifiable, either directly or indirectly, with particular reference to an identification element such as a name, an identification number, location data, an online identifier or one or more characteristic elements of his physical, physiological, genetic, psychological, economic, cultural or social identity" (the "Data").

During the duration of the contract, GeneSYS Informatica S.r.l. deals with the following data:

- name, surname and/or name of your company ;
- address;
- VAT code;
- contact details (email address, phone number);
- bank details (i.e. IBAN).

The provision of the data indicated is voluntary but necessary to allow the supply of the service requested by GeneSYS Informatica S.r.l. in default, it will be impossible for us to provide the service and manage the contractual relationship.

Anyhow, GeneSYS Informatica S.r.l. undertakes to ensure that the information collected and used are appropriate with respect to the purposes described and that this does not result in an invasion of your personal scope.

3. PURPOSE OF THE TREATMENT

a. For the establishment and the management of the pre-contractual relationship

Your data will be processed by GeneSYS Informatica S.r.l. for the establishment of the pre-contractual activities, such as the acquisition of preliminary information for the purposes of entering into the contract.

GeneSYS Informatica S.r.l.

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The legal basis for the processing of your data is the implementation of pre-contractual measures taken on request.

b. For the establishment and the management of the contractual relationship

Your data will be processed by GeneSYS Informatica S.r.l. for the establishment and subsequent management of the contractual relationship, administrative, operational, management and accounting services linked to the contract.

The legal basis for the processing of your data is the implementation of contractual relationship.

c. For the fulfillment of legal requirements

Your data will be processed for the fulfillment of legal requirements mandatory for the Data Controller like, as an example, fiscal requirements linked to the execution of the contract.

The legal basis for the processing of your data is the fulfillment of legal requirements mandatory for the Data Controller.

d. For inviting you to events, meetings, conferences

Your data will be processed by GeneSYS Informatica S.r.l. in relation with the organization and management of events, meetings and/or conferences, which could be of your interest, managed by the Data Controller and/or other companies of the Group of which the Data Controller is a part.

The legal basis for the processing of your data is the lawful interest of the Data Controller.

4. TRANSFER OF DATA TO PERSONS LOCATED ON THE EU TERRITORY

The Data Controller may communicate some of his data to subjects for which he or she is responsible for carrying out activities related to the management of the contractual relationship. In particular, in order to achieve the purposes described in paragraph 3 above, being an integral and essential part of the processing activities, your data may be disclosed to external companies and / or to other group companies located in the territory of the European Economic Area, offering to GeneSYS Informatica S.r.l., administrative, accounting and related services to the organization of events, as well as to external consultants who will process your data in their quality of Data Processor.

The list of data processors is updated by the Focal point Privacy and is available c/o the same for consultation. Moreover, the Data Controller may communicate your data, as well as to the subjects to whom the communication is due pursuant to legal obligations, to Public Administrations, to competent authorities, to other group companies located within the European Economic Area, be they subsidiaries or investee companies, insurance companies, consultants and credit institutions with which GeneSYS Informatica S.r.l. operates.

There is no form of dissemination of your data to indeterminate subjects.

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5. TRANSFER OF DATA OUTSIDE THE EUROPEAN UNION

In addition, to achieve the aforementioned purposes, your data could be transferred to companies belonging to the corporate group of which the owner is a party or to third parties located outside the European Economic Area offering services related to the management of the contractual relationship with GeneSYS Informatica S.r.l. or to which the transfer of your data becomes necessary as part of the performance of the aforementioned relationship.

This transfer, where the case occurs, will be regulated, according to the recipients, through the use of standard contractual clauses adopted by the European Commission or, alternatively, on the basis of an adequacy decision by the Commission and / or any other instrument allowed by the applicable reference legislation, where the case occurs, the use of rules business restrictions in the context of intra-group transfers.

You will be able to obtain information on the place where your data has been transferred, by writing to info@gsy.it.

6. DATA RETENTION PERIOD

Your data will be processed by GeneSYS Informatica S.r.l. for the whole duration of the contractual relationship and will be kept for a period of 11 years after the termination of that relationship, exclusively for purposes connected with the fulfillment of legal obligations or the defense of rights of GeneSYS Informatica S.r.l. in court.

7. YOUR RIGHTS IN YOUR QUALITY OF DATA SUBJECT

During the period in which GeneSYS Informatica S.r.l. is in possession or processing your data, You, as data subject, may, at any time, exercise the following rights:

- Right of access - You have the right to obtain confirmation about the existence or not of a processing concerning your personal data, as well as the right to receive each information relating to the same processing;
- Right to rectification - You have the right to obtain the correction of your personal data in our possession, if they are incomplete or inaccurate;
- Right to cancel - in certain circumstances, you have the right to obtain the cancellation of your personal data in our archives if not relevant for the continuation of the employment relationship or necessary for legal obligations;
- Right to limit processing - when certain conditions occur, you have the right to obtain the limitation of processing concerning your personal data, if not relevant for the continuation of the employment relationship or necessary for the obligation of law;
- Right to portability - You have the right to obtain the transfer of your personal data in our possession in favor of a different Data Controller;

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- Opposition right - You have the right to object, at any time for reasons related to your particular situation, to the processing of personal data that they are made by the Data Controller on the basis of their legitimate interest or execution of a task of public interest or the exercise of official authority, including profiling, unless there are legitimate reasons for the data controller to continue the processing that prevail over interests, rights and freedoms of the interested party or for the assessment, exercise or defense of a right in a Court of Law;
- Right of withdrawal of consent - You have the right to withdraw consent to the processing of your personal data at any time, subject to the lawfulness of the processing based on consent before revocation;
- Right to propose a complaint to the Supervisory Authority - in the event that GeneSYS Informatica S.r.l. refuse to meet your requests for access and / or exercise the above rights, the reasons for the relative refusal will be provided. If appropriate, you have the right to propose a complaint as described in the following paragraph.

These requests may be addressed to GeneSYS Informatica S.r.l. exclusively to the following e-mail address info@gsy.it.

8. CLAIMS

If you wish to lodge a claim about the manner in which your data are processed by GeneSYS Informatica S.r.l., or with regard to the management of a claim you have proposed, you have the right to submit an application directly to the Supervisory Authority.