WEB PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA PURSUANT TO ARTICLE 13 OF EU REGULATION 2016/679

Isa S.p.a., with registered office at Via Madonna di Campagna No. 123 (PG), in its capacity as Data Controller, hereby informs you that the processing of personal data collected via this website is carried out in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 ("Regulation" or "GDPR"). This privacy notice is provided to ensure maximum transparency and protection for data subjects.

The personal data subject to processing are those which you provide voluntarily whilst using the services offered by the website.

Types of data processed

- identification data (e.g. first name, surname)
- contact details (e.g. email address, telephone number)
- any additional personal data voluntarily entered into the form fields

Article 13 of the Regulation stipulates that, when personal data is collected from the data subject, the Data Controller is required to provide the following information.

Data Controller
The Data Controller is Isa S.p.A., with registered office at Via Madonna di Campagna 123 (PG).

Data Protection Officer

The Data Controller has appointed a Data Protection Officer (DPO), Ms Silvia Mezzancella, who may be contacted regarding enquiries and the exercise of rights at the following address: DPO@isaitaly.com

Purposes of processing and legal basis

Your personal data will be processed lawfully, fairly and transparently, for specific, explicit and legitimate purposes:

a) registration on the website and management of the user account;
legal basis: performance of a contract or pre-contractual measures at the data subject's request (Article 6(1)(b) of the GDPR)

b) handling of enquiries, requests for information and appointments;
legal basis: the performance of pre-contractual measures (Article 6(1)(b) of the GDPR)

c) sending promotional and commercial communications (newsletters, emails, text messages);
legal basis: consent of the data subject (Article 6(1)(a) of the GDPR)

d) processing of unsolicited applications and CVs submitted by the data subject;
legal basis: implementation of pre-contractual measures (Article 6(1)(b) of the GDPR)

The provision of data for the purposes referred to in points (a), (b) and (d) is necessary in order to process the data subject's requests; failure to provide such data will make it impossible to provide the requested services.

The provision of data for the purpose referred to in point (c) is optional.

Data retention period
For the purpose referred to in point (a), data will be retained for the entire duration of the relationship and, subsequently, for the period required by applicable legislation.

For the purpose referred to in point (b), the data will be retained for the time necessary to process the request and, in any event, for no longer than 24 months from the date of collection.

For the purpose referred to in point (c), the data will be retained for a period not exceeding 36 months from the date on which consent is given, unless consent is withdrawn earlier.

For the purpose referred to in point (d), the data contained in CVs will be retained for a period not exceeding 12 months from receipt, unless otherwise agreed with the data subject.

Withdrawal of consent
If you no longer wish to receive promotional communications, you may withdraw your consent at any time by sending a message to the following contact details:
email:privacy@isaitaly.com
or by post: Isa S.p.a., Via Madonna di Campagna No. 123 (PG)

Following such withdrawal, Isa S.p.a. will no longer process your data for the purposes set out in point (c), without prejudice to the lawfulness of any processing carried out prior to the withdrawal.

Recipients of personal data
Personal data may be processed by employees and collaborators authorised by the Data Controller and by third parties providing services necessary for the purposes set out above, appointed as Data Processors pursuant to Article 28 of the GDPR (for example: IT service providers, hosting providers, website management providers and newsletter distribution platforms). Apart from these cases, the data will not be disclosed to third parties or made public, except where required by law.

Disclosure of data to third parties for marketing purposes

Subject to your specific and separate consent, personal data may be disclosed to third parties acting as independent Data Controllers for the purpose of sending their own promotional and commercial communications. These third parties will process the data as independent Data Controllers, in accordance with their own privacy policies, to which reference is made. Failure to give consent to the disclosure of data to third parties does not in any way affect your ability to use the services offered by the Data Controller. Consent to the disclosure of data is optional and may be withdrawn at any time, in accordance with the procedures set out in this privacy notice

Transfer of data to third countries
Should technical or organisational requirements necessitate the transfer of data to countries outside the European Economic Area, such transfer will take place in accordance with the safeguards provided for in Articles 44 et seq. of the GDPR (for example, through standard contractual clauses approved by the European Commission).

Rights of the data subject
In relation to the processing of personal data, you may exercise the rights set out in Articles 15–22 of the GDPR, including the right of access, rectification, erasure, restriction of processing, objection and data portability.

• **How to exercise your rights**
You may exercise your rights by contacting the Data Controller at the following contact details:
email: privacy@isaitaly.com

Email: DPO@isaitaly.com

or by post: Isa S.p.a., Via Madonna di Campagna 123 (PG)

Right to lodge a complaint
Pursuant to Article 77 of the GDPR, if you consider that the processing of your data infringes applicable legislation, you have the right to lodge a complaint with the Data Protection Authority or to bring proceedings before the competent courts in accordance with Article 79 of the GDPR.

The Data Controller

Isa S.p.a.

CONSENT TICK BOX

☐ I confirm that I have read the privacy notice in accordance with Article 13 of EU Regulation 679/2016

☐ I consent to the processing of my personal data for marketing purposes (sending commercial and promotional communications)

☐ I consent to the disclosure of my personal data to third parties, commercial partners of Isa S.p.a., for the purpose of sending their own promotional and commercial communications, as set out in the privacy policy.

The Data Controller
Isa S.p.a.