

PRIVACY POLICY

Pursuant to the Article 13 of the EU Regulation no. 2016/679, containing provisions on the protection of natural persons with regard to the processing of personal data and on free movement of such data (hereinafter, the "GDPR"), we inform you that the personal data of users and/or visitors (hereinafter, individually the "User" or, collectively, "Users") who consult and/or visit and/or interact with the website <http://www.ian.it> (hereinafter, the "Site"), will be processed in compliance with the legislation on personal data protection and with the confidentiality which inspires our business, for the purposes and with the modalities better described in this Privacy Policy.

We also inform you that this Privacy Policy only concerns the Site and not any other website that the User may consult via hyperlink.

This Privacy Policy is easily consultable and accessible from the home page of the Site and through the link at the bottom of each page.

1. Data controller

The data controller of the personal data processed through the Site is I.A.N. S.r.l. (VAT number 04382650150) with registered office in 20145 Milan (MI), Via Alberto da Giussano n. 18, e-mail: privacy@ian.it (hereinafter also "I.A.N." an /or the "Controller").

2. Data protection officer

The Controller has appointed a data protection officer who can be contacted to the address set out in paragraph 1 (hereinafter, also the "Data protection officer" and/or the "DPO").

3. Categories of personal data processed

3.1 Data provided directly by the User

The optional, explicit and voluntary sending of e-mails to the addresses indicated on the Site entails the subsequent acquisition of the sender's address, which is necessary to respond to the requests, as well of any other personal data included in the same communication.

By using the "Contacts" section of the Site, the User is required to provide certain personal data such as name, surname, e-mail address, together with any additional information voluntary provided in the subject and body of the message.

3.2 Data collected by I.A.N. S.r.l.

Computer systems and software procedures used to operate the Site acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols.

It concerns information that is not collected to be associated with identified interested parties, but by their nature could, through the processing and association with data held by third parties, allow Users to be identified. This category of data includes IP addresses or domain names of computers used by Users who connect to the Site, URI addresses (Uniform Resource Identifier) of requested resources, the time of the request, the method used to submit the request to the server, the size of the file obtained in reply, the numerical code indicating the status of the response from the server (successful, error, etc.) and other parameters relating to the operating system and the User's IT environment.

3.3 Personal data of third parties

Should I.A.N. process personal data of third parties directly provided by a User, the latter undertakes that in such a case it has acted as the data controller of the third parties' data. Therefore, providing to I.A.N. such third parties' personal data, it guarantees that: *i*) the personal data that should be communicated to I.A.N. by the User have been processed by the User in compliance with the current data protection provisions; and *ii*) the aforementioned third parties have been duly informed in advance by the User about the methods and purposes of the processing and have authorized the User to do so.

The User will remain the only responsible for the communication of third parties' information and data without their consent or for the possible improper or unlawful use of such data.

4. Purpose of the processing and legal basis

The User's personal data are collected and processed by I.A.N. for the purposes strictly related to the use of the Site and of its services.

4.1. Reply to any requests and communications received

The personal data referred to in paragraphs 3.1 and 3.3 above will be processed to provide an answer to the communications and information requests received by I.A.N. to the User's contact details, as well as through the appropriate section "Contacts" of the Site.

The **legal basis** for the processing of the personal data for the purposes referred to in paragraph 4.1 above is the need to **perform a contract** where the User is a party or **the pre-contractual measures** adopted at the request of the same.

4.2. Allow the Site navigation

The personal data referred to in paragraph 3.2 above will be processed for:

- the technical management and to allow the User the Site navigation;
- the possible detection of liability in case of hypothetical computer crimes.

The **legal basis** for the processing of personal data for the purposes referred to in paragraph 4.2 above is the **legitimate interest** of the Controller.

5. Mandatory or optional nature of User's personal data provision - consequences of refusal

The provision to I.A.N. of the User's personal data collected through the Site may be mandatory for the achievement of the purposes identified in this Privacy Policy, or optional.

Any refusal to provide the personal data identified as mandatory will make it impossible to achieve the purpose of the specific data collection.

In particular:

- the provision of personal data by the User for the purposes referred to in paragraph 4.1 is optional, but the failure to provide such data will make it impossible to transmit any request and to receive the subsequent reply from I.A.N.;
- the provision of the User's personal data for the purposes referred to in paragraph 4.2 is optional but the failure to provide such data will make it impossible for the User to browse the Site and use the services offered.

6. Methods of processing personal data

The processing of the User's personal data will be lawful, correct and transparent, for specified, explicit and legitimate purposes and in compliance with data protection laws, regulations and provisions.

The User's personal data are mainly processed in electronic form and, in certain cases, also in paper form.

The personal data provided by the User will not be subjected to fully automated decision-making processes.

7. Recipients of personal data

The recipients of the Users' personal data and, therefore, the subjects who become aware of the Users' personal data are:

- (i) subjects appointed for the processing by I.A.N. to whom specific written instructions have been provided;
- (ii) subjects providing services on behalf of I.A.N. and formally appointed as data processors:
 - the company that manages the Site and provides the hosting service and the maintenance of the server where the Users' personal data are stored: Swype lab S.r.l. - Via G. Matteotti 107, Seregno 20831.
- (iii) subjects acting as independent data controllers.

For a complete and updated list of the subjects to whom the data are communicated, the User can write to the contact details indicated in art. 11 below "*Contacts for the exercise of the rights of the interested party and for further information*".

8. Retention period of personal data

8.1 For the purposes referred to in paragraph 4.1, the personal data will be kept for the time strictly necessary to follow up the correspondence between I.A.N. and the User.

8.2 For the purposes referred to in paragraph 4.2, the personal data will be kept for the retention period better defined in the cookie policy referred to in point 12.

9. Transfer and communication of personal data to third parties User's personal data are not transferred to non-EU countries.

10. Exercise of rights by the interested party

Pursuant to articles 13, paragraph 2, letters b), c) and d) and 15-22 of the GDPR, Users can exercise the following rights:

- a) the right to **access** their personal data, along with the information related to the purposes of the processing, the category of personal data processed, the subjects or categories of subjects to whom such data have been or will be communicated (specifying whether such subjects are located in third countries or are international organizations), when possible, the retention period of the personal data or the criteria used to determine such period, the origin of the data, the existence and the logic applied in the case of automated decision-making, the existence of the rights of rectification and/or cancellation of the personal data, of limitation of and opposition to the processing, of the right to lodge a complaint with a supervisory authority.
- b) the right to obtain:
 - i. the **correction** of their personal data, if they are inaccurate or incomplete;
 - ii. the **erasure** of their personal data, if there should be one of the conditions set out at the art. 17 of the GDPR (for example: the User's personal data is no longer necessary with respect to the purposes for which they were collected, the User decides to withdraw the consent to the processing – if consent represents the legal basis - and there is no other legal basis for the data processing, the User opposes the data processing and no other legitimate interest of the Controller prevails, the personal data are processed unlawfully);
 - iii. the **limitation** of the processing of the personal data concerning the User 1) for the time necessary for I.A.N. to ascertain the accuracy of the User's personal data (in the event that the User has contested it), or 2) if the processing of personal data is unlawful and the User requests, instead of deleting its personal data, the limitation of the related processing, or 3) if IAN no longer needs the User's personal data but the same are necessary for the User to ascertain, exercise or defend a right in court, or, finally, 4) for the time necessary to assess the possible prevalence of the legitimate reasons of the Controller with respect the User's one, if the User has opposed the processing of its personal data according to point c) below;
 - iv. the User's personal data in a structured, commonly used and electronically readable form also in order to transmit them to another controller, if the processing is based on consent or on a contract and is carried out by automated means (so-called right to **portability of the data**). If the User is interested, it can ask I.A.N. to transmit the personal data directly to the other controller, if this is technically feasible;
- c) the right to **oppose** the processing of its personal data, if such processing is carried out pursuant to art. 6.1 lett. e) (i.e. for the fulfillment of a public interest to which the Controller is subject) or lett. f) (i.e. to pursue

a legitimate interest of the Controller) of the GDPR, unless there are compelling legitimate reasons for the Controller to proceed with the processing, pursuant to art. 21 of the GDPR;

- d) the right to **withdraw the given consent** at any time and without prejudice to the lawfulness of the of the User's personal data processing carried out on the given consent and prior to the withdrawn;
- e) the User also has the right to **not be subjected to a decision based solely on an automated processing**, if the case may be, including profiling, which produces legal effects or impact the User significantly, also having the right to **obtain a human intervention** from the Controller, to **express its opinion and to contest the decision**;
- f) if the User is not satisfied with the processing of its personal data carried out by I.A.N., it can lodge a complaint within the Italian Data Protection Authority, following the procedures and indications published on the official website (www.garanteprivacy.it) ;
- g) any corrections or deletions of the User's personal data or any processing limitations made at the User's request – unless this should be impossible or involved a disproportionate effort - **will be communicated by I.A.N. to each of the recipients** to whom the User's personal data may have been transmitted in accordance with this Privacy Policy.

The exercise of the aforementioned rights is not subject to any formal constraint and is free of charge. I.A.N. may only require the User to verify its identity before taking further actions following the User's request.

11. Contacts for the exercise of the User's rights and for further information

To exercise its rights and/or to obtain any type of information regarding the processing of its personal data, the User may send a written communication to I.A.N. S.r.l. (VAT number 04382650150), with office in 20145 Milan (MI), Via Alberto da Giussano n. 18, e-mail: privacy@ian.it.

12. Cookies

The Controller uses cookies to allow safe and efficient exploration of the Site. For more information on cookies and their use on the Site, please consult the page dedicated to the Cookie Policy, which is an integral part of this notice, by clicking on the following link: <https://ian.it/en/cookie-policy>

13. Links to other websites

The Site contains links or refers to other websites that may have no connection with I.A.N..

The Controller does not control or monitor these websites and their contents. The Controller cannot be held responsible for the content of these sites and the rules adopted by them, including with regard to privacy and the processing of the User's personal data while browsing.

This Privacy Policy does not apply to third party websites. The Site provides links to these sites solely to facilitate the User in searching and browsing and to facilitate hypertext links on the Internet to other sites. The activation of the links does not imply any recommendations or warnings for accessing and browsing these sites, nor any guarantee regarding their contents, services or goods supplied by them and sold to Internet users.

14. Applicable law

This Privacy Policy is governed by Italian law and in particular by the legislation on data privacy, including the GDPR, the Privacy Code, authorizations and guidelines issued by the Italian Data Protection Authority which regulate the processing of personal data, where applicable.

15. Changes and updates to the Privacy Policy

The Controller may modify or simply update, all or in part, the Privacy Policy of the Site, also to incorporate any modification of the laws or regulations governing the matter. Changes and updates to the Privacy Policy will be notified to Users on the Home Page as soon as they are adopted and will be binding once published on the Site and will be contained and available on the Site. It is therefore advisable to regularly access this section to check the publication of the most recent and updated Privacy Policy.