

CLIENT
PERSONAL DATA PROTECTION POLICY
PURSUANT TO ART. 13 OF EU REGULATION 2016/679

Dear Clients,

In accordance with that provided for by art. 13 of EU Regulation 2016/679 (GDPR) and in application of the principles set forth by said GDPR, we hereby send you this privacy policy in order to make you aware of the characteristics and methods of processing ("Processing") on our part, of any data supplied by you to us in the context of the relations established and/or being established between ourselves and in relation to an identified or identifiable ("Personal Data") natural person ("Data Subject"), expressly including therein your employees and collaborators. Pursuant to art.4.1. GDPR, *"an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person"*.

1. Data Controller ("Controller").

The Data Controller is the company **Pan Urania s.p.a.**, Fiscal Code and VAT No. 00290190529, in the person of its *pro tempore* legal representative with registered office in Poggibonsi (SI), in Via Campania, n. 8/H, tel. +39 055 80551, fax +39 055 8078421, PEC: panurania@pec.it, email: info@urania.group, web: <http://www.panurania.com/>.

All correspondence concerning the Processing, also in accordance with the articles below, must be sent, from you and/or the Data Subject, by registered post with return receipt, from a certified email address (PEC) or by regular email to the contact details listed above.

2. Purposes of Processing ("Purposes") and legal basis.

The Personal Data collected from the Data Subject (art. 13 GDPR) or otherwise (art. 14 GDPR) shall be used by us exclusively for the following purposes:

- (i) to fulfil our precontractual and contractual obligations toward you;
- (ii) to fulfil and request fulfilment of specific obligations arising from laws and regulations;
- (iii) to send commercial offers with the intention of selling similar products and/or services to those already purchased (*soft-spam*);

The legal basis of the Processing consists of:

- the need on our part to fulfil a contract of which the Data Subject is a party, or precontractual measures adopted at the request of said Data Subject;
- the need on our part to fulfil a legal obligation;
- a legitimate interest pursued by the Data Controller (art. 6 lett. f) GDPR);

In regards to point (iii), the Data Controller specifies that in the context of the sale of a product or service, the email address of the Data Subject may be used by the Data Controller, without requesting the consent of the Data Subject, for the purpose of offering and selling similar services to those already sold (art. 13, 4 Italian Legislative Decree 196/2003). The Data Subject may object to said Processing at any time, free of charge, by simply sending a written request to the aforementioned addresses.

3. Mandatory or optional nature of provision of Personal Data.

Communication on your part of your Personal Data is optional, but necessary, insofar as any refusal to provide said data, and likewise the incorrect communication of said data, shall make it impossible for the Data Controller to establish the relationship or fulfil the various Purposes for which the Personal Data was collected.

For these same reasons, and also to ensure the correct management of the relationship in place, we also request that you notify us of any variations to the Personal Data already collected as soon as they occur.

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4. Communication of Personal Data.

The Personal Data is processed internally by persons authorised for Processing ("Authorised Persons") under the responsibility of the Data Controller for the Purposes listed above.

The Personal Data may be disclosed to external third parties in charge of carrying out functions that are instrumental and/or ancillary to the running of our business, who shall process said data on our behalf. Said Authorised Persons shall be nominated as external Data Processors ("External Data Processors"), in compliance with that provided for by art. 28 GDPR. An up-to-date list of the External Data Processors is available at the registered office of the Data Controller, which shall be provided to the Data Subject upon written request sent to the above addresses.

Apart from the aforementioned cases, the Personal Data may also be disclosed to other recipients and/or categories of recipients ("Recipients" and "Categories of Recipients"), only in order to carry out activities inherent to the precontractual and/or contractual relationship established between us and/or to fulfil legal obligations and/or orders by the Authorities, and in any case always in compliance with the guarantees envisaged by the GDPR and by the guidelines of the Italian Data Protection Authority, as well as by the Commission established in compliance with the aforementioned GDPR.

Without prejudice to the foregoing, the Personal Data shall in no case be disseminated and/or disclosed to third parties without the specific consent of the Data Subject and in any case only where necessary in order to fulfil the Purposes.

5. Processing of "special categories of personal data" and "personal data relating to criminal convictions or offences".

If during Processing the Data Controller becomes aware of Personal Data:

(i) belonging to "special categories" pursuant to art. 9 GDPR (that is, data revealing the "racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation"), said data shall be processed, exclusively for the indicated Purposes, only with the prior consent of the Data Subject, or in any case insofar as the Processing is necessary to fulfil obligations and exercise the specific rights of the Data Controller or Data Subject on the matter of workplace law, social safety and social protection, to the extent authorised by Union or Member State law, or by a collective agreement in accordance with Member State law, in the presence of appropriate guarantees for the fundamental rights and interests of the Data Subject;

(ii) relating to "criminal convictions or offences or related security measures" pursuant to art. 10 GDPR, Processing shall occur only under the control of the official Authority or if the Processing is authorised by Union or Member State law, which provides for appropriate guarantees and for the rights and freedoms of Data Subjects. A comprehensive register of criminal convictions shall be kept only under the control of the official Authority.

6. Methods of Processing.

Processing occurs using electronic and/or paper tools, and in any case, adopting organisational and IT procedures and measures able to ensure the data is secure, confidential, relevant and not excessive for the purposes for which it is processed.

7. Territorial context.

The Personal Data shall be processed within the territory of the European Union.

If for technical and/or operational reasons it becomes necessary to use subjects located outside said territory, these shall be nominated as External Data Processors and the transfer of Personal Data to said subjects, restricted to the carrying out of specific Processing activities, shall be regulated in compliance with that set forth by the GDPR, adopting all necessary precautions in

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order to guarantee the complete protection of Personal Data and basing said transfer on the evaluation of suitable guarantees (including, for example, decisions regarding the adequacy of third-party recipient countries expressed by the European Commission, adequate guarantees expressed by the third-party recipient pursuant to article 46 GDPR, etc.).

In any case, the Data Subject may request additional details from the Data Controller if their Personal Data has been processed outside the European Union, requesting evidence of the specific guarantees adopted.

8. Retention period.

The Personal Data will be stored by the Data Controller for the period strictly necessary to achieve the Purposes, and in particular until the termination of the precontractual and contractual relations in place between us, without prejudice to any further storage period that may be imposed by legal regulations.

In order to manage any disputes and claims, and in any case for the ascertainment, exercise or defence of a right in a court of law, the Personal Data may be stored for an additional period equal to that provided for by said right.

9. Method of releasing the privacy policy.

In compliance with the principle of proportionality, in consideration of the evident difficulty and excessive burden on the Data Controller in directly releasing the privacy policy to each Data Subject that collaborates or provides their services in your favour, including therein your employees and collaborators, we invite you to send this privacy policy to said Data Subjects, and in any case to inform them that said policy is available for consultation on our company website, or that it can be sent further to a written request submitted to the aforementioned addresses.

10. Rights of the Data Subject and methods of exercise.

The Data Subject, at any time, may exercise the rights granted to them by the GDPR ("Data Subject Rights") and in particular:

- Art. 15 - Right of access by the Data Subject: the Data Subject has the right to access their data and relative Processing. This right is substantiated by the possibility to obtain confirmation regarding whether or not one's Personal Data is being processed, that is, the possibility to request and receive a copy of the data subjected to processing;
- Art. 16 - Right to rectification: the Data Subject has the right to obtain from the Data Controller the rectification of inaccurate Personal Data concerning him/her without undue delay. Taking into account the Purposes, the Data Subject has the right to obtain the integration of incomplete Personal Data, also by providing a supplementary statement;
- Art. 17 - Right to erasure ("right to be forgotten"): the Data Subject has the right to obtain from the Data Controller the erasure of his/her Personal Data and to request that his/her Personal Data no longer be subjected to Processing, and in certain cases, if the conditions are satisfied, to obtain erasure without undue delay when the purpose of the Processing has been fulfilled, when consent has been revoked, or when Processing has been objected to or when Processing of his/her Personal Data is not otherwise compliant with the GDPR;
- Art. 18 - Right to restriction of processing: the Data Subject has the right to restrict the Processing of his/her Personal Data in case of inaccuracies, disputes or as an alternative measure to erasure;
- Art. 20 - Right to data portability: the Data Subject, except in the event the data has been archived using non-automated processing means (e.g. in paper form), has the right to receive, in a form that is structured, of common use and legible by an automatic device, Personal Data concerning him/her, in reference to data provided directly by the Data Subject with express consent and on the basis of a contract, and to request that said data be transmitted to

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- another Data Controller, if technically feasible;
- Art. 21 - Right to object: the Data Subject has the right to object at any time, for reasons connected to his/her particular situation, to the Processing of Personal Data relating to him/her.

If the Data Subject wishes to exercise one of the aforementioned rights, they must send their request directly to the Data Controller at the aforementioned addresses, without prejudice to the right to lodge a claim to the competent Data Authority.

The deadline for the Data Controller's response to the Data Subject, for all rights (including the right of access) and also in the event of denial, is 1 month, extendable to 3 months for particularly complex cases.

Art. 12 GDPR is nonetheless applicable.

11. Revocation of consent.

In cases whereby the Processing can only occur with the consent of the Data Subject and the latter has provided said consent, he/she has the right to revoke his/her consent at any time by sending a written request to the Data Controller at the aforementioned addresses.

The revocation of consent shall not compromise the lawfulness of processing based on the consent provided prior to the revocation.

12. Right to object

The Data Subject has the right to object at any time to the Processing of his/her Personal Data for direct *marketing* purposes, including profiling to the extent that it is related to such direct *marketing*, by sending a simple written request to the aforementioned addresses.

in force with effect from 25/05/2018

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