

Site policy on the Protection of Personal Data

This Policy for the protection of personal data regulates the manner in which Users access and make use of services offered on the Site, as subjects in possession of personal data warranting protection under the terms of **EU Regulation 2016/679** on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and the current laws on personal data protection.

Controller

is the company Seven S.r.l. Unipersonale - TIN/VAT reg n° 00544860281 - Via Dell'Industria, 2/C - 35012 Camposampiero, Padua / Italy - Tel + 39 049 8874518 - Fax +39 049 8874517 - seven@sevensrl.it

In keeping with its mission and values, the company Seven s.r.l. is committed to protecting the personal data of all persons with regard to identity, to the dignity of being human and to the fundamental liberties guaranteed constitutionally under the provisions of EU Regulation 2016/679 ("EU Reg" hereinafter) on the protection of natural persons with regard to the processing of personal data and on the free movement of such data ("Personal Data" hereinafter).

Our policy

The protection of Personal Data is based on observance of the principles set out in this document, which the Controller is committed to making known, respecting and impressing on partners, employees, co-workers and recipients or third parties with which the company works in the pursuit of its activity and mission.

The company identified as Controller undertakes to ensure that this Policy for Personal Data Protection, and its impact, will be understood, implemented and supported by all in-house and outside people involved in its activities, taking account of its true status, its investment possibilities and above all its corporate values.

In particular, Seven s.r.l. undertakes:

- to communicate and make known its policy with regard to the protection of personal data;
- to listen and stay attentive to all parties and stakeholders — partners, employees, co-workers, investors, promoters, beneficiaries, customers, suppliers, consultants — giving due weight to their enquiries concerned with the processing of personal data and responding without delay;
- to process personal data lawfully, fairly and transparently, in keeping with constitutional principles and with current regulatory provisions, in particular those of the new EU Reg and only for the time strictly necessary for the stated purposes, including those of complying with legal requirements;
- to collect only such personal data (relevant and limited) as is necessary for the purposes of processing activities;
- to process personal data in accordance with principles of transparency and solely for the purposes specified and expressed in privacy statements;
- to adopt procedures for updating and rectifying processed personal data to ensure that the details of the personal data are, as far as possible, accurate and up to date;
- to store and protect the personal data in its possession employing the best maintenance techniques available, not least using service contracts with providers that offer suitable assurances as to the security of processing operations and guarantee that the rights of the Data Subject are protected;
- to guarantee that measures adopted for the protection of personal data are continuously updated. This commitment will be pursued constantly according to the principle of taking responsibility, assiduously putting in place appropriate technical and organizational measures and suitable corporate policies to ensure it can be shown that processing is conducted in compliance with the EU Reg, taking into account the state of the art, the nature of the personal data stored and the risks to such data;
- to ensure that the methods of processing and storing Personal Data are made clear, transparent and opportune so as to guarantee that they are suitably secure;

- to provide training and supply information to the company's partners and staff, on the basis of the task they perform, regarding the principles of lawfulness and fairness with which this Policy for Personal Data Protection and the processing of personal data must comply, and observance of the safeguard measures adopted;
- to encourage development of the sense of responsibility and awareness of the entire organization with regard to personal data, which must be seen as the property of single data subjects;
- to ensure the observance of statutory and regulatory provisions applicable to the protection of personal data, updating the management of personal data protection procedures if need be;
- to prevent and minimize the impact of potential violations or unlawful and/or harmful processing of personal data, as far as is possible given the resources available to the company;
- to promote the inclusion of personal data protection in the plan for continual improvement pursued by the organization with its management systems.
- The present Policy on the Protection of Personal Data will be made known to all in-house staff, partners and co-workers, not least by way of specific awareness meetings.

Why this policy, and who it is intended for

This policy is addressed to users of the www.sevensrl.it website (the "Site" hereinafter) and to any natural person ("Data Subject" or "User" hereinafter) whose personal data may be processed by the Controller as part of the business activity carried on by the latter.

Access to certain sections of the Site and/or possible requests made by users for information or services, may be conditional on entering Personal Data that will be processed in accordance with the provisions of the EU Reg.

For certain specific services to be accessed by the User, specific privacy statements will be provided case by case and, where necessary, specific consent requested for the processing of Personal Data.

The present statement is provided only for the Site and does not apply on other websites visited by users following links that may be posted on this same Site.

Definitions

As concerning the term personal data, reference is made to the definition given in article 4 point 1) of the EU Reg, that is, *"any information relating to an identified or identifiable natural person; 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"* ("Personal Data" hereinafter).

The EU Reg requires that, before proceeding to process Personal Data — the term processing being taken to mean, according to the definition given in the EU Reg, *"any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction"* ("Processing" hereinafter) — the person who is the owner of such Personal Data must be informed as to the reasons and the purposes for which the request to supply such data is made and the manner in which the data will be utilized.

Personal Data can be communicated to specific subjects considered as recipients of the Personal Data. The EU Reg defines a recipient of Personal Data as *"a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not"* ("Recipients" hereinafter).

Personal Data may also be communicated to specific subjects considered by the EU Reg to be *"persons who, under the direct authority of the Controller or Processor, are authorized to process Personal Data"* ("Authorized Persons" hereinafter).

It is also established in the EU Reg that *"public authorities which may receive personal data in the framework of a particular inquiry, in accordance with Union or Member State law shall not be regarded as recipients"*.

Accordingly, the purpose of this document is to provide all such information, simply and intuitively, as may be practical and necessary in enabling Users to communicate their Personal Data in an aware and informed manner, and to request and obtain clarifications and/or rectifications at any time.

Categories of Data and Processing

of Browsing Data

The IT systems and software procedures deployed for the operation of this portal are able, during normal service and solely for the duration of the connection, to acquire certain items of personal data transmitted as a matter of course when Internet communication protocols are in use. These items of information are not collected so that they can be linked to the identified data subjects but, given their nature, they could be used via processing steps and associations with data held by third parties to identify users visiting the portal (e.g. IP addresses), domain names of the terminals utilized, addresses of enquirers with URI (Uniform Resource Identifier) notation, the time requests are submitted, etc. Such data will always be deleted immediately after being processed, and used solely for the purpose of gathering anonymous statistical information on the use of the site and checking its correct operation. Web contact data will not be retained for more than seven days, except where cyber crimes may have been committed, causing damage to sites. No data deriving from the service will be communicated or disseminated.

For more information on this topic, the Data Subject can refer to the [cookies policy in the Privacy section of the Site.](#)

Contact data provided by the User

The optional, explicit and voluntary communication of one's Personal Data when accessing services, and making enquiries by e-mail, will result in the Controller subsequently acquiring the address of the sender or other personal data, which will be retained for the purposes of replying to the enquiry or providing the requested service, also of carrying out all associated activities and complying with legal requirements (tax laws, for example). In the event of such data being withheld, or supplied only in part or inaccurately, it will be impossible to provide the requested services, and in certain cases to ensure compliance with regulatory requirements.

In order to gain access to the services offered or to submit enquiries, it may be necessary to register by filling in a registration, or first contact form ("Form" hereinafter).

Communication of the personal data indicated in the above noted form is mandatory for the purposes of completing the registration procedure, only in the case of items marked with an asterisk (*); accordingly, if these items are withheld, or incomplete or inaccurate, the registration will be invalidated and it will not be possible to access the services.

In accordance with articles 12 and 13 of the EU Reg, the Forms of the Site may contain statements for specific purposes connected with the use made of the pertinent parts of the Site by the User.

Data will be processed both manually and using computerized and telematic tools, in accordance with current rules and with principles of fairness, lawfulness, transparency, relevancy, comprehensiveness without excess, data minimization and accuracy, and with organizational and processing logic systems strictly related to the purposes in view, and in any event such as to guarantee the security, integrity and confidentiality of the processed data, in line with the organizational, physical and logical measures envisaged by current provisions. These will be implemented and boosted not least on the basis of developing technology, to guarantee confidentiality, accessibility and integrity of the processed data.

Purpose of processing and legal grounds for processing

User browsing data will be processed for the sole purpose of obtaining statistical information on how the Site is used. Regarding data supplied directly by the User: in order to benefit from the services offered by the Controller, or to submit enquiries by e-mail, such items of data are collected and processed, within the limits of the statement posted in the pertinent sections, so that replies can be given to the enquires received. Processing of the Personal Data supplied by filling in the registration or first contact Form and during the subsequent steps of processing relating to selection of the Project is undertaken for the purposes of: managing contact enquiries and requests for offers on services through all stages, including contractual, or making available technical material.

The legal grounds for processing are identifiable under article 6 of the EU Reg as: pre-contractual and contractual obligations relating to the performance of a contract; legal obligations with which the Controller must comply; the need on the part of the Controller to pursue a legitimate interest (e.g. right of defence).

Automated decision-making

The Controller states that no use is made of decision-making procedures likely to influence Data Subjects, based exclusively on automated processing of their personal data. All decision-making procedures associated with the purposes of data processing described above are performed by human agency.

Who processes and communicates personal data

Personal Data can be communicated to specific subjects identifiable as Recipients or to Persons Authorized to process such Personal Data by Authority of the Controller. On this basis, to the end of ensuring that all data processing operations necessary for pursuit of the purposes specified in the present Statement are carried out correctly, the following Recipients may find themselves in the position of processing Personal Data:

- employees and/or co-workers of the Controller performing functions involved in the activity of the Controller, who in this regard have received the appropriate instruction concerning the security and proper use of your personal data;
- third parties carrying out part of the Processing activities and/or activities connected with and instrumental thereto on behalf of the Controller, such as persons, companies, associations or professional practices based in countries of the European Union that have been engaged to provide services on behalf of the Controller, including maintenance of the Site and other support and/or consultancy activities. The above noted third parties are essentially classifiable in the following categories: (a) subjects with whom the Controller has made collaboration and service provider agreements; (b) subjects operating in the Sector; (c) banks involved in the delivery of Services; (d) Consultants.
- Public authorities or public bodies, for the fulfilment of legal obligations to which the Controller is subject, and any other public subject entitled to ask for data in cases envisaged by law.

Where required by law or in order to prevent or deter the commission of an offence, Personal Data can be communicated to public bodies or to the legal authorities.

It will be understood that any data processed will be only the data needed for achieving the specific purpose, and therefore that the data handled by third parties will be limited to the specific purpose.

Personal Data will not be disseminated.

International transfers of personal data

Personal Data will be processed by the Controller within the territory of the European Union. In the event that, for questions of a technical and/or operational nature, it should become necessary to use the services of subjects located outside the European Union, the transfer of your Personal Data, limited to the performance of specific Processing activities, will be regulated according to the provisions of chapter V of the EU Reg. All necessary precautions will therefore be taken to guarantee the fullest protection of your Personal Data by basing any such transfer: (i) on adequacy decisions expressed by the European Commission with regard to recipient third countries; (ii) on appropriate safeguards given by the recipient third subject in accordance with article 46 of the EU Reg; (iii) on the adoption of binding corporate rules.

Storage period

Among the principles applicable to Processing of your Personal Data is limitation of the storage period. In line with this principle, the Personal Data of Users will be processed by the Controller only as long as is necessary for pursuit of the purpose indicated in this Statement. Browsing data will be stored **in accordance with the times indicated in the cookies policy.**

Personal Data collected by way of the "contact form" will be processed for a period of time representing the minimum necessary, i.e. until the cessation of any pre-contractual and contractual relations in place with the Controller, taking account of the statutory limitation period and of mandatory storage for tax or other purposes required under legal provisions or by the EU Reg, in which case the principle of non-excessiveness will be applied (article 6 letter f).

Commercial communications and withdrawal of consent

In the event of the data supplied being used by the Controller to circulate informative material relating to the activities and the products offered by the selfsame Controller, such communications may be sent by e-mail, made by telephone, or conveyed in advertising material posted to the domicile of the Data Subject. Specific consent may be necessary for this purpose, however.

The sole consequence produced by the withholding of data and consent for this purpose would be to disallow the activity of circulating any such commercial communication.

Data supplied for the above noted purposes will be stored for a period consistent and commensurate with the purpose in question and, in any event, only as long as consent is not withdrawn. As envisaged by the EU Reg, in effect, in the event that the Data Subject has given consent to the Processing of Personal Data for one or more purposes for which it was requested, it can be withdrawn at any time, totally and/or partially, without affecting the lawfulness of processing based on consent before its withdrawal.

The procedures for withdrawing consent are easy and intuitive; the Data Subject need only contact the Controller using the channels of contact indicated in the present Statement.

In addition to the foregoing and for the sake of simplicity, should the Data Subject receive e-mail messages published by the Controller that are no longer of interest, it will suffice to click on the unsubscribe button shown at the bottom of the messages to ensure that no further communication will be received, not even by way of other channels of contact for which consent was given (SMS, letter post, fax, telephone calls, social media).

Rights of the Data Subject and how they are exercised

As envisaged in article 15 of the EU Reg, the Data Subject has the right to access his or her Personal Data and request that the details be rectified or updated if incomplete or inaccurate, or request their erasure if collected in breach of a law or of the EU Reg, and can also object to processing for legitimate and specific reasons.

In particular, the rights you are able to exercise at any time, addressed to the Controller, are the following.

Right of access: the right, according to article 15, paragraph 1 of the EU Reg, to obtain confirmation from the Controller as to whether or not Personal Data concerning you are being processed and, if this is the case, access to the Personal Data and the following information: a) the purposes of the Processing; b) the categories of Personal Data concerned; c) the Recipients or categories of Recipient to whom the Personal Data have been or will be disclosed, in particular Recipients in third countries or international organizations; d) where possible, the envisaged period for which the Personal Data will be stored, or, if not possible, the criteria used to determine that period; e) the existence of the right to request from the Controller rectification or erasure of Personal Data or restriction of Processing of Personal Data concerning the data subject or to object to such Processing; f) the right to lodge a complaint with a supervisory authority; g) where the Personal Data are not collected from the Data Subject, any available information as to their source; h) the existence of automated decision-making, including profiling, referred to in article 22 paragraphs 1 and 4 of the EU Reg and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such Processing for the Data Subject.

Right to rectification: according to article 16 of EU Reg, the rectification of your Personal Data that may be inaccurate. Taking into account the purposes of the Processing, moreover, you can have incomplete Personal Data completed, including by providing a supplementary statement.

Right to erasure: according to article 17 of EU Reg, you can request the erasure of your Personal Data and the Controller shall be under obligation to erase your Personal Data without undue delay, where one of the following grounds applies: a) the Personal Data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; b) you have taken the step of withdrawing the consent on which the processing is based and there are no other legal grounds for the processing; c) you object to the processing pursuant to article 21 paragraph 1 or 2 of the EU Reg and there are no overriding legitimate grounds for the processing; d) your Personal Data have been unlawfully processed; e) there is a need to erase your Personal Data for reasons of compliance with a legal obligation under European Union or Member State law.

In certain cases, as envisaged by article 17 paragraph 3 of the EU Reg, the Controller is justified in not erasing your Personal Data to the extent that Processing is necessary, by way of example, for compliance with a legal obligation, for reasons of public interest, for archiving purposes in the public interest, or for statistical purposes, or for the establishment, exercise or defence of legal claims. Right to restriction of processing: you are entitled to obtain a restriction of Processing, in accordance with article 18 of the EU Reg, where one of the following applies: a) you have contested the accuracy of the Personal Data (the restriction will last for a period enabling the Controller to verify the accuracy of the Personal Data); b) the Processing is unlawful but you have opposed the erasure of the Personal Data and requested a restriction of use instead; c) the Controller no longer needs the Personal Data for the purposes of the Processing, but the Personal Data may be needed for the establishment, exercise or defence of legal claims; d) you have objected to Processing pursuant to article 21 paragraph 1 of the EU Reg and await verification of whether the legitimate grounds of the Controller override those of the Data Subject. In the event of Processing being restricted, the Personal Data will be processed (and you will be informed before the restriction is withdrawn) only with your consent, except for the purposes of storage, or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest.

Right to data portability: the Data Subject has the right at any time, in accordance with article 20 paragraph 1 of the EU Reg, to request and obtain that all his/her Personal Data will be processed by the Controller in a structured, commonly used and readable format or to request that such data be transmitted to another controller without hindrance. In this instance it will be the task of the Data Subject to provide us with all the exact details of the new controller to which the Personal Data must be transferred, and with written authorization.

Right to object: in accordance with article 21 paragraph 2 of the EU Reg, you can object at any time to the Processing of your Personal Data in the event that processing is for direct marketing purposes, which includes profiling, to the extent that this is related to such direct marketing.

Right to lodge a complaint with a supervisory authority: without prejudice to any other administrative or judicial remedy, if you consider that the Processing of your Personal Data conducted by the Controller is in breach of the EU Reg and/or of applicable statutory regulations, you are entitled to lodge a complaint with the competent Data Protection Supervisor.

The rights aforementioned can be exercised by contacting the Controller

To exercise the rights listed above, the Data Subject can contact the Controller by e-mail at the following address: privacy@sevensrl.it

For any request or need, the Data Subject can send a communication that must be addressed to Seven S.r.l. Unipersonale - TIN / VAT Reg 00544860281 - Via Dell'Industria, 2 - 35012 Camposampiero, Padua / Italy - Tel + 39 049 8874518 - Fax +39 049 8874517

Moreover, Users can at any time consult the “**Privacy Section**” of the Site, where they will be able to find all necessary information concerning the Policy on the processing of Personal Data adopted by the Controller, the use and processing of Personal Data, and up-to-date information regarding the contacts and communication channels made available to Data Subjects by the Controller.

The Controller is the company Seven s.r.l.