

Summary of Arrangement between Joint Controllers – pursuant to Art. 26, par. 2 of EU Regulation 2016/679

Dear User,

In connection with the processing of your data, Sistemi and its working Partner have entered into an agreement entitled Arrangement between Joint Controllers which determines, in a clear and transparent manner, their respective responsibilities for compliance with the obligations under the newly introduced European data protection legislation.

Sistemi and its Partner have established a point of contact for any queries you may have regarding the processing of your data, the privacy statement or the contents of this arrangement:

protezionedati@sistemi.com. In particular, Sistemi and its Partner have established the following:

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The arrangement aims to regulate the respective responsibilities of the parties for compliance with the obligations under EU Regulation 2016/679 and additional legislative provisions regulating the processing of personal data.

OBLIGATIONS AND RESPONSIBILITIES OF JOINT CONTROLLERS

The Joint Controllers share decisions relating to the purposes of data processing and the methods to be adopted; more precisely they are obliged:

- a) to ensure that data are processed with respect for the rights, fundamental freedoms and dignity of natural persons, with particular reference to confidentiality and personal identity;
- b) to process personal data in full compliance with the Regulation;
- c) to store personal data in a form that permits the data subjects to be identified only for as long as the services are supplied;
- d) to notify each Joint Controller promptly of any requests or applications made by Data subjects in the manner envisaged in articles 15 to 22 of the Regulation; the Joint Controller receiving the aforementioned requests or applications is obliged to inform the other Joint Controller without undue delay that they have been received.

PURPOSES OF PROCESSING

The Joint Controllers have agreed that personal data collected will be processed exclusively for the purposes established in the Privacy Statement, published by Sistemi in the reserved area in the User contracts section ([Privacy Statement for Users](#)), that these data will not be profiled (as defined in art. 4 (4) of the EU Regulation 2016/679), and that data will not be transferred to third parties.

DATA PROCESSORS AS DEFINED BY ART. 28

The Joint Controllers have undertaken to use the services of only those Data Processors providing adequate guarantees, to implement appropriate technical and organisational measures, and to keep a full, up-to-date list of subjects to whom data may be disclosed.

EXERCISE OF RIGHTS BY DATA SUBJECTS AND COMPLAINTS

Data Subjects, as defined in art. 26 (3) of the Regulation (EU) 2016/679, may, regardless of the provisions contained in this Arrangement, exercise their rights against each Joint Controller, summoning one Joint

Controller, independently of the other, before the competent supervisory authorities. Sistemi and its Partner have decided that complaints and requests to exercise rights made by Data Subjects against the recipient Partner shall be dealt with by Sistemi, without prejudice to the company's right to instruct the recipient Partner to deal directly with the matter.

PERSONAL DATA BREACH

Each Joint Controller must inform the other without delay of suspected personal data breaches, indicating the documentary evidence referred to in art. 33 (5) of the Regulation, so that the incident may be reported within 72 hours by Sistemi to the competent supervisory authority. In any event, the Joint Controllers will take the measures referred to in articles 33 and 34 of the Regulation.

PRIVACY AND CONFIDENTIALITY

The Joint Controllers undertake to treat as confidential personal data collected, processed and used as part of the working relationship set up between them; these obligations shall continue to apply, even after the relationship in question has terminated.

SECURITY OF PROCESSING

The Joint Controllers are obliged to implement all the appropriate technical and organisational measures to protect personal data collected, processed or used as part of the working relationship set up between them against unauthorised access, alteration, destruction or loss, unauthorised transmission or other abuse, pursuant to art. 32 of EU Regulation 2016/679.

The Joint Controllers undertake to monitor the level of security during processing operations on a periodic basis, to ensure that it is appropriate at all times to the risk.

TRANSFER TO THIRD COUNTRIES

Each Joint Controller will ensure that, whenever data are transferred outside the EU/European Economic Area, they are passed on solely to subjects providing adequate guarantees, such as Adequacy Decisions from the European Commission or Standard Contractual Clauses approved by the European Commission. Each Joint Controller undertakes to make available a list of recipients of transferred data, whenever requested.
