

To all our Clients

Re: **Privacy Statement** - pursuant to art. 13 of the GDPR

Data Controller

SCP Srl, with registered office in Belluno (BL), at Via Vittorio Veneto, 274, Tax code and VAT no. 00524890258, recognised by current data processing legislation as the Data Controller, hereby informs the data subject that data protection legislation (European Regulation 679/2016, hereinafter referred to as the GDPR; the Privacy Code, as subsequently amended) provides for the protection of natural persons with regard to the processing of personal data, based on the principles of lawfulness, fairness, transparency, data minimisation, respect for fundamental rights and freedoms, as well as the data subject's personal dignity, with particular reference to confidentiality, personal identity and the right to safeguard one's own personal data.

Data subject to processing

All data are collected directly from the data subject. The Data Controller processes personal identification data such as: the organisation's general and contact details (first name, surname, company name, address, e-mail, telephone number, VAT number, tax code, contact person, etc.), data relating to bank coordinates, identification codes and any other information necessary to pursue the purposes described under the heading below.

When supplying contractual services connected with the maintenance of hardware/software, SCP Srl may come into contact with the Clients' data contained in them (including special categories of processed data, judicial data and data relating to minors).

Purpose of processing and legal basis

Data will be processed for the following purposes:

- a) to satisfy requests made before entering into the contract for information regarding products and/or services offered by SCP, or any other matter specified directly by the data subject;
- b) to conclude, handle and fulfil contractual obligations;
- c) to fulfil legislative obligations (provided for by laws, regulations and/or EU legislation);
- d) to satisfy administrative and/or organisational needs;
- e) solely with your consent, to engage in marketing activities, using traditional (standard post, telephone calls with operator), or automated (e-mail, text) methods.

Processing will be based on:

- art. 6, par. 1 letter b) GDPR (processing is necessary for the performance of a contract or in order to take steps prior to entering into a contract) for the purposes described under letters a), b) and d);
- art. 6, par. 1 letter c) GDPR (compliance with legal obligations) for the purpose described under letter c);
- art. 6, par. 1 letter a) GDPR (the data subject has given his or her consent) for the purposes described under letter e).

Scp Srl

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Sede Operativa:

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Processing methods

Data may be processed either by paper or computer in accordance with relevant data protection regulations, in particular, implementing appropriate technical and organisational measures (as provided in art. 32 of the GDPR).

Conferment of data

The conferment of data processed for the above-mentioned purposes is optional. However, if you fail to provide such data, supply them only partially or supply inaccurate data, we cannot guarantee that the services envisaged in the contract will be provided correctly or that information regarding the Data Controller's products/services will be sent.

Access, transfer and disclosure of data

The data subject's personal data may be shared with the following recipients:

- Subjects normally acting as data processors; persons, companies or professional practices who/which provide Scp Srl with accounting, administrative, legal, tax, financial and debt collection assistance and consultancy services, in relation to the supply of services for the dispatch of advertising material and contractual communications, companies carrying out market analyses and research; a full list of all the data processors can be consulted by writing to the mail address: privacy@scponline.it;
- Subjects with whom the company is obliged to interact in order to supply the services (e-mail service management platforms, on-line questionnaires, webinars)
- Subjects with whom the company is obliged to interact in order to supply communication services and also organise online events and seminars;
- Subjects delegated to deal with technical maintenance operations (including the maintenance of network equipment and electronic communication networks);
- Persons given authorisation by the Data Controller, necessary to conduct activities strictly connected with the supply of services; such persons are bound by a legal confidentiality covenant;
- Associates of Scp Srl for internal administrative purposes;
- Factoring companies, banks, credit insurance companies;
- Professional associations or training organisations accredited by those associations;
- Competent subjects, bodies or authorities to whom/which personal data must be disclosed in order to fulfil legal obligations, to prevent abuse or fraud, or to comply with orders given by the Authorities.

Joint controllers

SCP Srl operates in partnership with a number of Software Houses for the distribution and promotion of the products and services they offer; in these situations, SCP Srl and the Software Houses act as joint data controllers. Agreements entered into and defining the responsibilities of each party for compliance with obligations laid down by current legislation, in particular, as regards the exercising of the rights of the data subject, can be consulted on the website www.scponline.it - Privacy section or can be obtained by the data subject by sending an e-mail to the address: privacy@scponline.it.

Storage period

The Data Controller shall store:

- personal data processed for the purpose of supplying the Service and fulfilling related contractual obligations, for the time strictly necessary to attain those purposes. In any event, as such data are processed in order to supply services, the Data Controller may store them for a longer period, that is, for as long as is necessary to safeguard its interests, against possible liability connected with the services provided;
- personal data processed for Marketing purposes, until consent given by the data subject is withdrawn. Once consent has been withdrawn, the Data Controller will refrain from using the data for this purpose,

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but may store them in order to safeguard the said Controller's interests against possible liability stemming from the processing in question;

- personal data processed for the purpose of fulfilling legal obligations, for the period envisaged for the specific legal obligations in question or by legislation applicable.

Rights of data subject

As data subject, you may exercise the following rights at any time:

- right of access to your data and to obtain information regarding the purposes of the processing, the categories of personal data concerned, the recipients or categories of recipient to whom the personal data have been or will be disclosed, the period for which the data will be stored (**right of access**);
- the right to obtain the rectification of inaccurate personal data or to have incomplete personal data completed (**right to rectification**);
- the right to obtain the erasure of personal data whenever valid grounds exist, such as, for example, consent has been withdrawn, or the data are no longer necessary for the purposes for which they were collected, or when data have been unlawfully processed (**right to erasure - "to be forgotten"**);
- the right to obtain the restriction of processing whenever the data processed are considered to be inaccurate, or unlawful (**right to restriction of processing**);
- the right to receive your personal data in a structured, commonly used and machine-readable format and the right to transmit the data to another Data Controller without hindrance from Scp Srl (**right to data portability**);
- the right to object at any time, on grounds relating to your particular situation, to the processing of your personal data (**right to object**);
- the right to withdraw your consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal (**right to withdraw consent**);
- the right to lodge a complaint with the supervisory authority (www.garanteprivacy.it) if you believe that your personal data are being processed in a manner contrary to current legislation.

How to exercise your rights and contact the Data Processor

You may exercise your rights or ask for further information at any time, writing to the Data Processor:

SCP Srl – Data Processor

Via Vittorio Veneto nr. 274 – 32100 Belluno (BL);

e-mail: dpo@scponline.it

Notes

Scp Srl reserves the right to modify or revise the contents of this statement to adapt to changes in legislation applicable. The data subject is therefore invited to check the contents regularly to ensure that he or she is kept up-to-date with the methods adopted to process his/her personal data.

Belluno, 22 July 2019

The Data Controller
SCP SRL

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