



## Information on the processing of personal data

**pursuant to art. 13 of the European Regulation n. 679/2016 concerning the protection of individuals with regard to the processing of personal data (GDPR)**

Dear Customer,

SOME OF US S.R.L. with headquarters in Via Sebastiano Veniero, 32 - Milan (MI), tel. 02-39216522, mail info@someofus.it, pec someofus@pec.it, for the principle of transparency, provides the following information in order to make it aware of the characteristics and methods of processing your data:

### **Who we are and what data we treat (article 13, paragraph 1 letter a, article 15, lett. B GDPR)**

SOME OF US S.R.L. in the person of its legal representative p.t., based in Via Sebastiano Veniero, 32 - Milan (MI), it acts as Data Controller and guarantees the utmost confidentiality in the processing of its personal data, their accuracy and their update as established by current legislation on the protection of personal data. We care about the security of your data and to prevent loss, unlawful or unlicensed use and unauthorized access, we use and observe specific security measures.

### **Subject of data processing**

The Data Controller processes personal data (for example name, surname, physical address, province and municipality of residence, landline and / or mobile, fax, fiscal code, VAT number, company name, personal email, bank and payment references, eg . IBAN), hereinafter "data", communicated by you on the occasion of the conclusion of contracts for the owner's services and / or for marketing purposes.

The Data Controller has NOT appointed a Data Protection Officer (Data Protection Officer –DPO).

### **For what purposes we need your data (article 13, paragraph 1 GDPR) and on what legal basis.**

The data are used by the Data Controller to process the registration request and the contract for the supply of the chosen Service and / or the product purchased, to manage and execute the requests for contact forwarded by the customer, to provide assistance, to comply with legal and regulatory obligations which the Data Controller is required to perform based on the activity performed. In no case SOME OF US S.R.L. uses your personal data for purposes not stated. In particular, your data will be processed for the following purposes:

#### **a) For the registration and the requests for contact and / or information material.**

The processing of your personal data takes place to carry out the preliminary activities and consequent to the registration request, the management of requests for information and contact and / or sending of informative material, as well as for the fulfillment of any other obligation deriving from it.

The legal basis of these treatments is the performance of the services inherent to the registration request, of information and contact and / or sending of information material and compliance with legal obligations.

#### **b) For the management of the contractual relationship.**

The processing takes place to carry out the preliminary activities and consequent to the purchase of one of our services, the management of the order, the provision of the service itself, the relative invoicing and the management of the payment as well as the fulfillment of any other obligation deriving from from the contract, to fulfill the obligations provided for by the law, by a regulation, by the community legislation or by an order of the Authority (for example in the field of anti-money laundering), to exercise the rights of the Holder (for example the right of defense in court);

The legal basis of these treatments is the performance of the services concerning the contractual relationship and the compliance with legal obligations.

#### **c) For promotional activities on Services similar to those purchased by the interested party / customer (Recital 47 GDPR).**



SOME OF US SRL, even without explicit consent, may use the contact data communicated by the interested party, for the purpose of direct sale of its Services, in the case of Services similar to those object of the sale, unless the Interested Party / Customer does not explicitly oppose it.

**d) For commercial promotion activities on services other than those purchased by the interested party - Customer.**

Your personal data may also be processed for marketing, commercial promotion, surveys and market research purposes with respect to ServicesottiProducts that the Owner offers only if you have freely authorized the treatment and are not opposed to this. This processing can take place as follows: - e-mail; - messages; - telephone contact and can be carried out if you have not revoked your consent for the use of the data.

The legal basis of these treatments is the free, optional and explicit consent to the processing of personal data provided by you prior to the treatment itself, which is revocable freely and at any time.

Where SOME OF US S.R.L. intended to further process your personal data for a purpose other than that for which they were collected; prior to such further processing, we will provide you with information regarding this different purpose and any other relevant information.

**Refusal to provide the data necessary for the performance of the requested service. (Article 13, paragraph 2, lett. And GDPR).**

The collection and processing of personal data is necessary to process the requested services. If you do not wish to provide the personal data expressly provided for as necessary, SOME OF US S.R.L. will not be able to follow up the treatments related to the management of the requested services and / or the contract, nor to the obligations deriving from them.

**Refusal to consent to the processing of personal data for commercial promotion activities on services other than those purchased.**

If you do not consent to the processing of personal data for these purposes, the processing will not take place for the aforementioned purposes, without this having effects on the provision of the services requested, nor for those for which he had already given his consent, if requested. In the event that you had previously given your consent and would like to revoke it later or oppose the processing for marketing promotional promotion activities, your data will no longer be processed for such activities, without this involving consequences or effects detrimental to you and the services already performed requests.

**How do we process your data? (art. 32 GDPR)**

We inform you that the processing of your personal data takes place in compliance with the principles of lawfulness, correctness and transparency of the processing. We guarantee that the processed data will be adequate, relevant and not excessive in relation to what is necessary for the purposes of the processing (principle of minimization of data).

The data is processed electronically and on paper, using appropriate tools to guarantee the security and confidentiality of the data, in compliance with the provisions of Chapter II (Principles) and Chapter IV (Data Controller and data controller) of the Regulation.

Data may also be processed by automated means to store, manage or transmit the data and, in any case, it will be performed in compliance with the provisions of the Regulation.

The processing of your personal data is carried out by means of the operations indicated in the art. 4, n. 2) of the Regulation, namely collection, recording, organization, structuring, storage, adaptation or modification, extraction, consultation, use, communication by transmission, dissemination or any other form of provision, comparison or interconnection, limitation, cancellation or destruction;

SOME OF US S.R.L. uses appropriate security measures in order to preserve the confidentiality, integrity and availability of your personal data and imposes similar security measures on third-party suppliers and Data Processors. Your personal data is stored in paper, computerized and telematic archives located in countries where the GDPR (EU countries) is applied.



### **How long are your data kept? (Article 13, paragraph 2, letter a GDPR).**

Unless you explicitly express the will to delete them, in relation to the different purposes and the purposes for which they were collected, your personal data will be stored for the time required by applicable law, and in any case for a period of time no longer than to that necessary to achieve the aforementioned purposes, and specifically relating to the execution of the contract for a period of ten years (term beyond which the rights arising from the contract itself will be prescribed).

In the case of data provided for marketing purposes of commercial promotion for services other than those already acquired by you for which you initially gave your consent, these will be kept for 24 months, unless the consent given is revoked and / or until you ask for to unsubscribe from the promotional communication service / sending newsletters, save the actual transformation in anonymous form that does not allow, even indirectly or by linking other data banks, to identify the interested parties. At the end of this period, the data will be completely or partially deleted automatically (pursuant to the applicable legislation), or made anonymously so as not to allow the identification of the interested parties, even indirectly or by connecting other data banks. In any case, if you decide to withdraw your consent or object to the processing, your data will be deleted within 30 days of the request.

In the event that he should forward to SOME OF US S.R.L. personal data not requested or not necessary for the execution of the requested service, SOME OF US S.R.L. cannot be considered the holder of these data, and will provide for their cancellation as soon as possible.

### **What are your data rights? (articles 15 - 20 GDPR)**

You can exercise at any time the rights referred to in articles 15, 16, 17, 18, 20 and 21 of the Regulations. In particular, you have the opportunity to obtain from the Data Controller confirmation of the existence or not of personal data concerning you, even if not yet recorded and their communication in an intelligible form and access to the following information:

- o Purpose of the processing,
- o Categories of personal data processed,
- o Addressees or categories of recipients to whom personal data have been or will be communicated, in particular if they are recipients of third countries or international organizations;
- o Period of storage of personal data provided or, if this is not possible, the criteria used to determine this period;
- o If the data is not collected from the data subject, all information available on their origin;
- o The existence of an automated decision-making process and, in such cases, significant information on the logic used, as well as the importance and expected consequences of this treatment for the data subject;
- o The existence of adequate guarantees pursuant to Article 46 relating to the transfer to third countries or international organizations.

Furthermore, you have the right to:

- o Obtain the updating, rectification, integration of your data, and cancellation, within the terms allowed by the law, if there is no legitimate prevailing reason for the Data Controller compared to the one that gave rise to the request, and in any case in the case in to which you have opposed the processing for commercial promotion activities. It may also request that the data be anonymized, the processing be limited, and has the right to object, in whole or in part, for legitimate reasons, to the processing of personal data concerning you;
- o Obtain the portability of electronically processed data, provided on the basis of consent or contract;
- o Withdraw your consent, if required;
- o Propose a complaint to the Control Authority.

To this end, the Company invites you to present your request in writing, including the date and signature, by sending it by e-mail to the following e-mail address [info@someofus.it](mailto:info@someofus.it) or by registered letter to the following address: SOME OF US SRL, Via Sebastiano Veniero, 32 - Milan (MI). To exercise the rights, you may also contact SOME OF US S.R.L. - c.a. Data Protection Officer - Via Sebastiano Veniero, 32 - Milan (MI). - e-mail: [info@someofus.it](mailto:info@someofus.it)

We inform you that we will respond to your requests within one month, except in particularly complex cases, so it could take up to 3 months. In any case, we will explain the reason for the waiting within one month of your request.

The result will be provided in writing or electronically. If you request the correction, the cancellation as well as the



processing limitation, we undertake to communicate the results of your requests to each of the recipients of your data, unless this proves impossible or involves a disproportionate effort.

We remind you that the withdrawal of consent does not affect the lawfulness of the treatment based on consent before the revocation.

#### **Complaint (Art. 15 GDPR)**

Without prejudice to any other administrative or judicial action, you have the right to lodge a complaint with the supervisory authority. You can then contact the Guarantor for the protection of personal data by e-mail, [atedia@vac.gdpd.it](mailto:atedia@vac.gdpd.it) or by registered letter with return receipt, or by hand delivery to the Guarantor for the protection of personal data, which has its headquarters in Rome (Italy), Piazza di Monte Citorio n. 121, cap 00186. For further information, visit the institutional website of the Privacy Guarantor [www.garanteprivacy.it](http://www.garanteprivacy.it)

#### **Who are the recipients and / or any categories of recipients of your personal data?**

Your personal data will not be disclosed and may be known, to the extent necessary and for the purposes indicated, by employees and collaborators of SOME OF US S.R.L., authorized pursuant to Art. 29 of the Regulation, as well as may be disclosed to third parties, appointed External Managers, to the processing of personal data pursuant to Article 28 of the GDPR, with an appointment contract, which contains the methods of treatment and the security measures that these must adopt for the management and storage of personal data owned by the Company as:

- External Bodies, including private bodies, involved in inspections of various kinds;
- External Consultants previously appointed;
- Suppliers of the company that process the data on behalf of SOME OF US S.R.L. and to consultants who provide services to the same.

The data could also be transmitted to the Public Security Authority following a request and to the Judicial Authority in case of necessity.

The complete list of subjects to whom your personal data have been or may be communicated is at your disposal after your request to be made by e-mail to the address [info@someofus.it](mailto:info@someofus.it). Your data will not be transferred to a third country or to an international organization. Where SOME OF US S.R.L. Should you transfer data to servers outside the European Union, we are committed to ensuring that this transfer will take place, subject to the stipulation of the contracts envisaged by the European Commission in accordance with the applicable legal provisions.

#### **Why do we communicate data?**

We will communicate your data in case of legal or contractual obligation as a necessary requirement for the conclusion of a contract.

#### **Profiling**

We do not use automated processes aimed at profiling.

#### **Owner and manager of the treatments.**

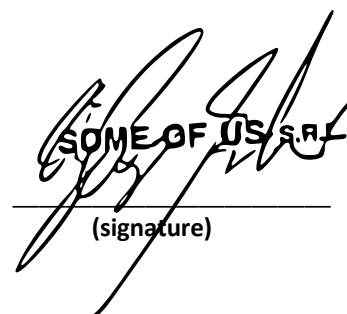
The data controller is SOME OF US S.R.L. in the person of the legal representative pro tempore.

The updated list of data processors is kept at the headquarters of the Data Controller.

SOME OF US S.R.L.  
Via Sebastiano Veniero, 32 - Milan (MI)

01-07-2019

(date)

  
SOME OF US S.R.L.  
(signature)