

PRIVACY NOTICE ART.13 GDPR FRAMESI EDUCATION WEBSITE

REV. 01 Date 10/14/20

Dear Customer,

We want to inform you that "EU Regulation 2016/679" concerning the protection of natural persons with regard to the processing of personal data, as well as the free circulation of such data (hereinafter "GDPR"), views the safeguarding of individuals in the processing of data of a personal nature as a fundamental right. Therefore, pursuant to Article 13 of the GDPR, we inform you with this Privacy Notice about the handling of the personal data entered by you in the website http://EDUCATION.FRAMESI.IT (hereinafter "website") and about the services made available through the website of the same Company.

The Data Controller is Framesi S.p.A. (VAT number 00729650960), in the person of legal representative Roberta Franchina (hereinafter "Data Controller"), with office at SS dei Giovi 135 in 20037 Paderno Dugnano (MI), who informs that, pursuant to Art. 13 of EU Regulation 2016/679 ("GDPR"), your data will be processed in the manner and for the purposes specified below.

- **1. Object of processing:** the Data Controller processes personal data (example: name, last name, business name, Country, address, telephone, e-mail, username, payment methods and invoices—then indicated as "Personal Data") provided during registration and purchase of webinar shows, and/or in-class seminars, and/or e-learnings on the website. Live webinars' participation might include the chance of interacting with our trainers via chat hence the possibility of asking questions (without storing the speech).
- 2. Purpose of processing: your data will be processed by the Data Controller to access the website, to receive potential technical support (ex: in case of forgotten password) and for invoicing the participation fee related to the purchase of the website contents. The explicit consent of the User is required for use of the data entered during the registration phase (e-mail address) by Framesi for the periodic sending of DEM (Direct Email Marketing) and newsletters to inform you about the exclusive initiatives that the Company makes available.
- **3. Manner of processing:** the processing of your personal data is done by means of the operations specified in Art. 4(2) of the GDPR, namely: collection, recording, organization, storage, consultation, elaboration, modification, selection, extraction, comparison, use, interconnection, block, communication, deletion and erasure of data.

Your personal data may be processed both by elaboration on paper and electronic means. The Data Controller will process the personal data for the time necessary to achieve the purposes as per above and in any case for no more than 10 years from the date of recording, or termination of the relationship, or until such a time when you decide to to cancel your website registration.

- **4.** Access to data: your data may be made accessible, for purposes as per Art. 2, to the Data Controller's employees and collaborators, in their capacity of delegates and/or in-house employees accountable for data and/or system administrators and outsourced employees accountable for data control (e.g. the web agency charged with the management and maintenance of the website).
- **5. Communication of data and transfer of data extra-EU:** the data collected are not subject to transfer outside the European Union.

The personal data are stored in servers within the European Union, located in Frankfurt. It remains understood in any case that, if necessary, the Data Controller shall have the right to move the servers, even extra-EU. In that case, the Data Controller ensures from this time on that the transfer of data extra-EU shall take place in compliance with the applicable provisions of law, by stipulation of the standard contractual clauses as provided by the European Commission.

6. Rights of the Data Subject: in your capacity of Data Subject you have certain rights specified under Art. 15 of the GDPR, namely the right: 1) to obtain confirmation as to whether or not personal data concerning you exist, regardless of their being already recorded, and communication of such data in intelligible form; 2) to obtain information as to: a) the source of the personal data; b) the purposes and methods of processing; c) the logic applied to the processing if carried out with the help of electronic means; d) the identification data concerning the Data Controller, Data Processors and the Representative designated as per Art. 3(1) of the GDPR; e) the entities or categories of entity to whom or which the personal data may be communicated and who or which may get to know said data in their capacity as designated representative(s) in the State's



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territory, data processor(s) or person(s) in charge of the processing; 3) to obtain: a) updating, rectification or, where interested therein, integration of the data; b) erasure, anonymization or blocking of data that have been processed unlawfully, including data whose retention is unnecessary for the purposes for which they have been collected or subsequently processed; c) certification to the effect that the operations as per letters a) and b) have been notified, as also related to their contents, to the entities to whom or which the data were communicated or disseminated, unless this requirement proves impossible or involves a manifestly disproportionate effort compared with the right that is to be protected; 4) to object, in whole or in part, on legitimate grounds, to the processing of personal data concerning you, even though they are relevant to the purpose of the collection.

Where applicable, you also have rights pursuant to articles 16-21 of the GDPR (right to rectification, right to erasure, right to limitation of processing, right to portability of data, right to objection), as well as the right to lodge a complaint with the Privacy Authority.

- **7. Procedure for exercise of rights:** at any time you may exercise said rights by sending an e-mail to Framesi S.p.A. as follows: risorseumane@pec.framesi.it.
- **8. Data Controller, Head Data Processor and Data Processors:** the Data Controller is Framesi S.p.A. The Head Data Processor is Ms. Roberta Mencarelli, e-mail address: risorseumane@pec.framesi.it.

The updated list of the subjects in charge of processing and of the Data Processors is kept at the office of the Data Controller.