

## **INFORMATION FOR THE PROCESSING OF PERSONAL DATA**

**2022/**

The company InGeno s.r.l. (P. IVA 11588050960), with registered office in Milan (MI) at Viale Luigi Majano 28 in its capacity as personal data controller (hereinafter the "Data Controller") of the website [www.ingeno.it](http://www.ingeno.it) (hereinafter the "Site"), informs visitors to the Site (hereinafter the "Data Subject") pursuant to Article 13 of the European Regulation No. 2016/679, the General Data Protection Regulation (GDPR).

The Data Controller is aware of the importance of the processing of the personal data of the Data Subject and, for this reason, it takes care to indicate what data is processed and how it is processed. By proceeding to browse the Site or by indicating the desire to use the services provided by the same, the Interested Party declares that he/she has read and accepted this information (hereinafter "Information Notice"), thereby granting consent for the processing of personal data by the Data Controller.

For any information, doubt or request relating to this Policy, the Data Controller provides available to the Data Subject at the following email address: [info@ingeno.it](mailto:info@ingeno.it)

### **What are the rights of the Data Subject in relation to the processing of personal data?**

The Data Subject has the following rights

- the right to be informed that there is a data processing operation in place concerning him/her and, if so access to the personal data processed;
- right to rectification of personal data
- the right to erasure (right to be forgotten) of personal data concerning him/her;
- the right to restriction of the processing of personal data concerning him/her;
- the right to data portability to receive, or have transmitted to another controller, personal data concerning him/her in a structured, commonly used and machine-readable format;
- the right to object to the processing of personal data;
- right to withdraw previously given consent;
- the right to lodge a complaint with the competent authorities for violation of personal data processing.

### **How to exercise rights?**

The Data Subject may exercise his rights by writing to the email address indicated above. The Data Controller does not intend to charge Data Subject for exercising any of his rights, but in order to do so, the Data Controller may require specific information to follow up the communications from the Data Subject in relation to the rights.

The aforementioned communications are usually acknowledged within 30 days of receipt of the communication itself, but in the event that this deadline cannot be met (e.g. due to excessive requests or complexity of the response), the data controller shall inform the data subject and keep him or her updated on developments in the communication. keep him/her updated on the development of the communication sent.

### **What personal data is processed?**

The Data Controller processes personal data supplied to it by the Data Subject or by third parties in order to be able to follow up the contact requests of the Data Subject received through the Site (hereinafter the "Services").

*a) Data provided directly by the Data Subject*

<b>Category of personal data</b>	<b>Types of data</b>
Identification and contact data	First name, surname, residence/domicile, email address, telephone
Technical data	IP address

*b) Data collected by third parties*

<b>Third party source of personal data</b>	<b>Types of data</b>
External suppliers	<ul style="list-style-type: none"><li>• Contact data</li><li>• Technical data</li></ul>

**Aggregate data**

The Data Controller may collect, use and share aggregated data, such as statistical or demographic data for any purpose.

Aggregated data may be derived from the Data Subject's personal data, but once aggregated does not constitute personal data within the meaning of the GDPR as they are not capable of identifying the Data Subject directly or indirectly. However, if the Data Controller combines or connects the aggregated data with the personal data of the Data Subject so as to allow the identification of the Data Subject, directly or indirectly, the Data Controller shall process the resulting data in accordance with the Information Notice.

**Particular Data**

The Data Controller does not process any category of special data relating to the Data Subject (a special data ethnic or racial origin, religious or philosophical beliefs, sexual orientation, political opinions, trade union membership, genetic, biometric and health data), just as it does not processes any data relating to criminal convictions and offences concerning the Data Subject.

**Why is personal data processed?**

The Data Controller processes personal data for the purposes set out in the table below. The GDPR requires that, for each purpose of processing personal data, the Data Controller has a legal basis for carrying out the processing.

The Data Controller may process the personal data of Data Subject by means of their consent as a legal basis for the processing. Consent may be revoked at any time, but the processing carried out until the consent is revoked cannot be affected.

Below is a summary table of the purposes and a description of them:

<b>Purpose</b>	<b>Description</b>	<b>Storage</b>
Delivering Services	The Data Subject may, via	Data will be retained until

	<p>the Site request to reserve the purchase of the products offered by the Company, specifically specifically, he/she may select the Kit on the on the basis of his or her own needs and the needs of a third party.</p>	<p>when the provision of the individual the provision of individual Services.</p>
<p>Providing support to Data Subject</p>	<p>Resolving technical issues encountered by Data Subject during navigation, their requests for assistance improve the Services and the Site and provide support requested by Data Subject.</p>	<p>The data will be stored until until the processing of the request for of the data subject</p>
<p>Newsletter</p>	<p>The Data Controller may send updates not with commercial content, to inform the Data Subject of developments in its business such as agreements with business partners, and participation in events.</p>	<p>Data will be stored for 12 months</p>
<p>Soft Spam</p>	<p>The Data Controller may send updates, not with commercial content, strictly related to the kit sold and to complementary services.</p>	
<p>Comply with obligations legal, regulatory and protection of the Data Controller's activity</p>	<p>The Data Controller may process the data subject's personal data in order to comply with legislative and regulatory obligations, such as to comply with the provisions of the judicial and administrative authorities. The Data Controller may also process the data in order to protect his rights and interests, such as, for example, in the case of judicial protection or due diligence in the event of assessments of changes in the corporate structure.</p>	<p>Personal data will be retained for the period of time determined by the law, the regulation and/or the authority of reference authority.</p>

**What happens if the Data Subject does not provide the necessary personal data?**

If the data is necessary to provide the Services and to provide support to the Data Subject, the Data Controller will not be able to provide them and support the Data Subject in his/her requests. In this case the Data Controller may, alternatively, request the integration of the personal data or delete the personal data of the Data Subject preventing the provision of the Services.

For purposes other than the provision of Services and providing support to Data Subject, the provision of personal data is optional and failure to provide personal data will not affect the aforementioned purposes of Processing.

**To whom is personal data communicated and disseminated?**

*a) Communication*

The personal data of Data Subject may be communicated to third parties other than the Data Controller, as better indicated in the table below:

<b>Target audience</b>	<b>Purpose of the communication</b>
Suppliers	The Data controller's suppliers support him in the provision of the Services with, but not limited to, Site development, hosting maintenance, backup, virtual infrastructure.
External consultants	In the event of legal obligations or obligations relating to a relationship established with the Data Subject, the Data Controller may communicate personal data to external consultants, such as, for example, the accountant and the lawyer.
Authorities and proceedings judicial	The Data Controller may communicate the personal data of data subject to authorities state and/or administrative and/or judicial authorities if this is obligatory under the law, regulations or provisions of the authorities or to defend its own rights and/or interests.

*b) Diffusion*

The personal data of Data Subject will not be disseminated.

**Where do we store personal data?**

The Data Controller stores personal data in paper files within the Data Controller's premises, as well as in computer files located both within and outside the European Union if this is instrumental to the pursuit of the purposes indicated above. In the latter case, the Data Controller ensures that companies not based within the European Union are treating the personal data with the utmost confidentiality of personal data in compliance with the European Commission's adequacy decisions, of any Privacy Shields or, if necessary, by entering into agreements guaranteeing an adequate level of protection.

**How is personal data processed?**

The Data Controller processes the personal data of Data Subject by adopting appropriate security measures aimed at preventing unauthorized access, disclosure, modification and destruction.

Data processing is carried out by means of computer procedures, telematic means and, on a residually, on paper by specially authorized internal persons as well as by external data processors were appointed, and this also on the basis of existing contractual agreements.

**What is the policy on the processing of children's data?**

The Data Controller is aware of the sensitive nature of the processing of children's data. In particular, the Services are not intended to be provided to minors under the age of 18 and the Data Controller does not voluntarily process data of minors under 18 years of age: in this sense, Data Subject is requested not to request the provision of the Services if age is under 18.

The Data Controller encourages those exercising parental responsibility over minors under the age of 18 to check that they do not request the provision of the Services and, in any case, to educate children under the age of 18 not to release their personal data via the Site. In the event that the Data Controller becomes aware that some personal data relate to minors under 18 years of age, the Data Controller will take steps to delete the personal data.

**What happens if there are links to other websites?**

The Data Controller informs Data Subject that this Policy applies only to the Site and, if there are links to other websites, the Data Subject must check the information on those sites before releasing his/her personal data.

The Data Controller takes no responsibility for personal data provided by Data Subject on other websites.

**Changes to the Policy**

The Data Controller reserves the right to change this Policy at any time. In case of changes the Data Controller will upload the new Policy on this page and, in this sense, if it urges the Data Subject to check the changes to the Policy: the Data Subject may view the history of the disclosures by checking the date affixed.

By continuing to use the Site after the changes, the Data Subject accepts these changes and consent to the processing of data as modified.