PRIVACY POLICY

PREAMBLE

This privacy policy is provided pursuant to **Article 13 of Regulation (EU) 2016/679** (hereinafter, "Regulation") as well as **Legislative Decree No. 196/2003** and subsequent amendments (hereinafter, "Code"), and is intended to inform visitors and users of the website https://datathesys.it (hereinafter, "Users" and "Website") about the processing of their personal data in relation to the use of the Website (hereinafter "Personal Data").

For the purposes of this document, "personal data" refers to any information capable of identifying, directly or indirectly, the User. "Processing" means any operation or set of operations performed on Personal Data, whether or not by automated means, including collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination, or otherwise making available, alignment or combination, restriction, erasure, or destruction.

Generally, the processing of the User's Personal Data will be conducted in accordance with the principles of fairness, lawfulness, transparency, purpose and storage limitation, data minimization, accuracy, integrity, confidentiality, and accountability, as set out in **Article 5 of the Regulation**. The Personal Data will be processed in compliance with the provisions of the **Regulation, the Code, and other applicable laws**.

If the User uses the Website on behalf of a third party, the User authorizes the Data Controller to collect the personal data of that third party. The Data Controller will process the third party's personal data for the same purposes for which it processes the User's Personal Data, applying the same policies and security measures.

If the User qualifies as a "commercial user" pursuant to **Regulation (EU) 1150/2019**, they acknowledge that, when using the intermediation services offered by the Website, they may have access to the following categories of personal data:

- Personal and contact details of themselves and other "commercial users" on the Website;

- Personal and contact details of the User to whom they offer their services; and that, for the processing of such data, they will be considered an **independent data controller** (as further specified in **Article 5** of this policy).

1. DATA CONTROLLER

The data controller is **Softhesys S.r.l.**, with registered office in **Albano Laziale (Rome), Tax Code and VAT No.: 17249271002**, email address: **info@softhesys.it** (hereinafter referred to as the "Data Controller").

2. PERSONAL DATA PROCESSED

a. Browsing Data The use of Internet communication protocols involves the transmission of certain data that is not collected to be associated with identified individuals. Such data includes, for example, the **IP addresses** of the computers used by Users, the **time of Users' requests**, and parameters relating to the User's **operating system and IT environment**. These data are used solely for the purpose of obtaining **anonymous statistical information** on Website use and to monitor its correct operation, ensuring proper service provision and security.

b. Data voluntarily provided by the User Users may voluntarily provide personal information to the Data Controller, for example:

- By sending messages to the email addresses indicated on the Website;

- By registering on the Website (e.g., email address, name, surname, etc.).

If a payment service is required, the User will be redirected directly to the **payment service provider's website**, which will process the data as an **independent controller**, excluding any liability on the part of the Data Controller.

c. Cookies For the processing of data via cookies, please refer to the relevant **cookie policy** available on the Website.

3. PURPOSES OF PROCESSING

The User's Personal Data will be processed for the following purposes:

a) To provide the services requested by the User (e.g., Website registration, User account management, etc.); b) To respond to specific requests addressed to the Data Controller through communication channels published on the Website; c) To send **service-related communications**, which are **non-commercial**, regarding the User's use of the Website; d) To comply with any **legal obligations**, regulations, or European Union laws, or to fulfill requests from authorities; e) To enable **Website navigation and statistical analysis**, without the ability to identify the User.

4. LEGAL BASIS AND OBLIGATORY OR OPTIONAL NATURE OF PROCESSING

The legal basis for the processing of Personal Data for the purposes referred to in **sections 3(a), 3(b), 3(c), and 3(d)** is **Article 6(1)(b) of the Regulation**, as processing is necessary for service provision.

The processing referred to in **section 3(e)** is a legitimate data processing activity under **Article 6(1)(c) of the Regulation**.

Failure to provide Personal Data will result in the Data Controller being unable to provide the requested services.

5. RECIPIENTS OF PERSONAL DATA

The User's Personal Data may be shared with:

- Entities acting as **data processors**;

- Other Users who will become **independent controllers**;

- Authorities to whom data disclosure is mandatory by law;

- Employees of the Data Controller authorized for processing.

6. SOCIAL MEDIA

The Data Controller also processes data of Users interacting with its social media profiles. Depending on the type of interaction, the legal basis for data processing may be **Article 6(1)(a), (b), or (f) of the Regulation**.

Information on the use of Personal Data can be found in the privacy policies of each provider:

- **Instagram:** http://instagram.com/about/legal/privacy/

- **Facebook:** https://www.facebook.com/full_data_use_policy

7. TRANSFER OF PERSONAL DATA

When using certain services, some Personal Data may be transferred **outside the European Economic Area (EEA)**.

To ensure protection, the Data Controller:

- Relies on **European Commission adequacy decisions**;

- Uses **Standard Contractual Clauses**.

8. DATA RETENTION

Personal Data is retained as follows:

- Data processed under **sections 3(a), 3(b), 3(c), and 3(d)**: For the time strictly necessary.

- Data processed under **section 3(e)**: Until required by law.

9. USER RIGHTS

The User may request:

- **Access** to Personal Data (Article 15);

- **Rectification** (Article 16);

- **Erasure** (Article 17);

- **Restriction** (Article 18);

- **Data portability** (Article 20).

Requests must be sent to **info@softhesys.it**.

The User has the right to **file a complaint** with the competent **Supervisory Authority** (Garante per la Protezione dei Dati Personali) under **Article 77 of the Regulation**.

10. CHANGES TO THIS POLICY

The Data Controller may **amend or update** this Privacy Policy at any time. Changes will be **published on the Website**.

Users are encouraged to **regularly check** the Website for updates.