



GENERAL DATA-PROTECTION POLICY STATEMENT PURSUANT TO
ARTICLES 13-14 ON PERSONAL DATA PROCESSING

(EU Regulation 2016/679 of the European Parliament and of the Council, 27 April 2016)

For the purposes provided for by EU Regulation 2016/679 on the protection of individuals regarding Personal Data processing and by Law No. 196/2003 amended by Legislative Decree No. 101 of 10 August 2018, we inform you that the processing of Personal and/or Particular Data provided by you and acquired by NETSTORMING S.R.L. (herein referred to as "The Company") will be based on principles of fairness, lawfulness and transparency, and will be carried out in compliance with the regulations provided for by the above-mentioned Regulation and the Law, as well as in respect of the rights and obligations arising therefrom.

DATA CONTROLLERS

The Data Controller is the company NETSTORMING s.r.l. with registered and operational headquarters in Via Brunacci 9B, Venice (VE), Italy; tax code and VAT number 08146291003; regular e-mail: admin@netstorming.net; telephone landline: +39 041-8877782; certified e-mail: netstorming@legalmail.it; web site: www.netstorming.net.

The partners of the company are Mr. Nicola Rizzardini, born in Venice on 14 September 1977, resident in Venice in Via Jacopo Diedo 1/A; e-mail: nicola.rizzardini@netstorming.net; Mr. Matteo Giacomazzi, born in Venice on 11 September 1975, resident in Noale (VE) in Via Giordano Bruno n. 5; e-mail: matteo.giacomazzi@netstorming.net.

The legal representative of the company is Mr. Nicola Rizzardini, born in Venice on 14 September 1977, resident in Venice in via Jacopo Diedo 1/A; e-mail: nicola.rizzardini@netstorming.net.

A contact person within the company has been appointed to deal with data protection issues, namely Mr. Matteo Giacomazzi, a partner of the Company.

For further information or should this information not be sufficiently clear, precise, comprehensible and intelligible, you may at any time consult the web page: www.netstorming.net, or request information by writing to the certified e-mail address: netstorming@legalmail.it, by regular e-mail: admin@netstorming.net, or by recorded-delivery letter to the above address.

If a means of contact other than certified e-mail or recorded-delivery letter is used, the Company does not assume responsibility for the failed, incomplete, irregular or delayed delivery of communications.

DATA PROCESSORS

As part of its activities, the Company makes use of data processors and/or persons in charge of processing, who provide sufficient guarantees to implement adequate technical and organizational measures so that the processing meets the requirements of the EU Regulation and guarantees the protection of the rights of the data subject/s.

The main external data processors of personal and particular data are:

- the Company's accountant;
- the Company's employment consultant;

- the Computer system administrator;
- the company that manages chat services, newsletters, sms-lists, and any other related services. The complete list of external Data Processors is in any case available from the Company.

Further data processors may be appointed as required by law.

The Company scrupulously seeks to rely only on professional and reliable third parties but cannot assume any responsibility for the collection, use, disclosure and security policies and procedures adopted by such third parties.

For all matters relating to the processing of your Personal and/or Particular Data and/or to exercise the rights provided for in the Regulation itself, listed in this Policy Statement, you may contact the Data Processors - requesting their name and contact details - by sending a certified e-mail to: netstorming@legalmail.it, by regular e-mail to: admin@netstorming.net, or by recorded-delivery letter to the above address.

If a means of contact is used other than certified e-mail or recorded-delivery letter, the Company does not assume responsibility for the failed, incomplete, irregular or delayed delivery of communications.

PERSONAL DATA SUBJECT TO PROCESSING

"Personal Data" means information that personally identifies you or enables a person to be identified. Personal Data that can be collected in the manner prescribed by law the following include: name, surname, gender, date and place of birth, marital status, residence, domicile, tax code, VAT number, e-mail- and certified-e-mail addresses, landline and mobile phone numbers, fax number, citizenship, photocopy of identity document, tax code, health-card, and other personal documents; photocopy of driver's licence; corporate name and registered office of legal persons; data relating to the corporate structures; Chamber of Commerce reports of companies; personal data of natural persons acting in the name, on behalf of, in the interest of companies; IBAN code and bank account details; data from cookies; technical data on navigation; User ID, IP address number or similar; Skype username or similar; personal images and photographs.

In more limited circumstances, we may also collect any other useful, appropriate, relevant data that are limited to what is necessary with respect to the purposes listed below.

DATA PROTECTION OFFICER OF PERSONAL AND PARTICULAR DATA

As Data Protection Officer (DPO), the Company has appointed the company Diritto e Pratica S.R.L.S. a Socio Unico, with registered office in Padua in via Giovanni Berchet n. 16, regular e-mail: info@dirittoepratica.com, certified e-mail dirittoepratica@pec.it.

HOW PERSONAL DATA IS COLLECTED

The Data may be acquired directly from the Data Subjects or from other professionals or public databases. Data is collected for specific, explicit and legitimate purposes, checked periodically for accuracy and, if necessary, updated.

Personal data will be collected in different ways:

- **SITE VISITS AND OFFLINE INTERACTIONS** : We collect your personal information when you visit the Company;
- **ONLINE SERVICES**: We collect your personal data when you contact us;
- **CUSTOMER SERVICE METHOD**: We collect your personal data when you make a telephone service request, when you send us an e-mail or fax, including through contact and chat forms.

COLLECTION OF OTHER DATA

"Other Data" means information which does not reveal personal identities or which does not relate directly to an individual. If "Other Data" reveal the identity of a person or refers to them, they will be treated as Personal Data. "Other Data" includes:

- data on your browser or device;
- data collected through cookies;
- other data provided by you.

METHODS OF COLLECTING OTHER DATA

The Company collects "Other Data" in different ways:

- **BROWSERS AND DEVICES**: We collect certain information and technical data through your browser or device that relates to navigation.
- **COOKIES**: Certain information is collected by cookies, which are information bytes stored directly by the device/s you use. We may use this information for security purposes, to facilitate navigation, to show you the information more effectively, for statistical purposes, and to select which of our offers and advertising may be of most interest to you. The data-protection policy statement on cookies and any online consent or dissent can be consulted and provided in the cookies section at: www.netstorming.net.

CONSEQUENCES OF NOT PROVIDING DATA

Data provision is used to complete and execute the optional contract but is strictly necessary to establish the contractual relationship and ensure it functions properly. Any refusal to provide the aforementioned data could lead, and normally entails, the impossibility to complete and execute the contract.

The provision of data to receive communications, including advertising, is optional, and any refusal to provide them will make it impossible to receive only such communications and will not affect any other contractual relationships that may exist with the Data Controller.

The provision of data for contact requests and the sending of spontaneous work applications is optional; any refusal to provide such data will only have the effect of not being able to meet the request of the person concerned, or to consider the relevant application.

PURPOSE OF PERSONAL DATA PROCESSING

The processing of personal and/or particular data and other data is aimed at offering you our services:

- the performance of the Company's business activity according to the branches of activity indicated in the previous point, both in the pre-contractual and contractual phase;
- fulfilment of legal obligations incumbent on the Company;
- hiring of Company staff and managing the employment relationship until its termination;
- promoting social activity also through marketing initiatives, with the express consent of those concerned.

The processing of your personal and/or particular data may also be subject to communications required by law, or by order of authorities, or may be carried out to exercise legal rights, for example the right of defence in court.

The Company also processes the data to manage customers' personal data, to manage cookies and navigation data.

We will use your personal and/or particular data and other data to manage the contractual relationship with you, as it is in our interest to do so and/or to comply with legal obligations.

It is not mandatory to provide your personal and/or particular data necessary to provide the services requested and execute the contracts (including pre-contractual deeds), however refusal to provide such personal data makes it impossible for the company to fulfil the request.

LEGAL BASIS FOR PROCESSING

The processing of personal and particular data is carried out as it is necessary to execute the contract or pre-contractual measures, to fulfil legal obligations, and to pursue legitimate interests of the Data Controller (i.e. the right to exercise the business and the rights and powers connected to it).

In other cases, such as works supporting the promotion of the Company, data processing is performed by virtue of the express consent of the Data Subject for one or more specific purposes.

The processing of Personal Data to fulfil the contract and pre-contractual measures does not require consent, however failure to provide such data does not allow the contract and pre-contractual measures to be properly performed.

The processing of Personal and/or Particular Data to comply with regulatory requirements is mandatory so your consent is not required.

Your express consent will also be required - and the lack of it will in this case not preclude the provision of the requested Service - to carry out work for promoting the Centre's services by letter, telephone, SMS, e-mail and other communication systems.

COMMUNICATION OF PERSONAL AND/OR PARTICULAR DATA TO THIRD PARTIES

Your Personal and/or Particular Data will not be disclosed in any way however they may be transmitted to the competent bodies for administrative or institutional purposes, as required by current legislation.

In particular, to pursue the purposes indicated above, it may be necessary to communicate your Data to the following categories of recipients, to the extent strictly necessary for them to perform their respective duties or functions:

- subjects within the Company, having the function of Data Processors;
- subjects external to the Company, with the function of Data Controllers;
- authorities and public bodies to which communication is required by law or contract;
- credit and insurance companies;
- persons in charge of support and maintenance functions of information and communication systems;
- the Company's legal counsel in the event of disputes;
- other professionals the Company uses to fulfil its legal and contractual obligations, and to exercise its rights.
- debt-collection companies in the event of need;
- the transferee company should a company or business branch be transferred.

The subjects belonging to the above categories perform the function of "Data Processors", or operate in full autonomy as separate Data Controllers.

Data may be communicated to family members or acquaintances only with the express authorization of the person concerned.

In the event of need, other recipients of Personal Data will be identified in compliance with current legislation.

PROCESSING AND TRANSFER METHODS OF PERSONAL AND/OR PARTICULAR DATA

Personal Data processing is performed manually and/or electronically using printed or computer files, including portable devices, with access allowed only to authorized operators. It is carried out through operations consisting in the collection, recording, organization, storage, consultation, processing,

modification, selection, extraction, comparison, use, communication, deletion and destruction of the Data. The processing is carried out by the Controllers, Processors and others expressly authorized by the Controllers, who follow specific training courses, and who are periodically updated on data-protection regulations, and made aware of the respect and protection of customers' dignity and confidentiality. All the Company's operators who access computerized data are identified and provided with a personal password; access to the data is allowed only for purposes related to the role of the operator and only for the time strictly necessary to process the service for which customers have turned to the Company. All processing methods are carried out with systems that minimize the risk of alteration, cancellation and dispersion of Personal Data.

The transfer of Personal Data to third parties will mainly take place by certified e-mail, e-mail, fax, portal, paper (by hand or courier), and surface mail.

The updated list of subjects identified as Controllers, Processors or Co-Controllers can be requested from the Company by certified e-mail or recorded-delivery letter at the addresses indicated above.

TRANSFER OF DATA ABROAD

The data processed by the company may be sent outside of Italy:

- to Switzerland, where the IT system administrator, BCYBER SA (Chiasso - Switzerland), is based;
- to the United States of America, where the company The Rocket Science Group LLC is based, for newsletter, chat and similar services;
- to Luxembourg and the United Kingdom, where the company that owns the 'Amazon' Cloud is based;
- to Belize where the "CRM Nethunt Limited" is based;
- to The Philippines, where the company NSPH IT Solutions is based;
- to locations outside Italy where the Company's customers and suppliers are located.

DATA RETENTION

The retention of Personal and/or Particular Data is limited to the time provided for by current legislation, with a maximum term of ten years. If the relationship is ongoing, the Company will keep your Personal and/or Particular Data for up to ten years after the termination of the relationship. Once the assignment has been completed, the Company may however decide to keep your Data for a shorter time if practically appropriate or necessary. The Data collected may also be processed for longer if an action intervenes of interruption and/or suspension of the prescription that justifies the extension of data retention, and in all cases where it is necessary to retain the data to exercise a right or fulfil a duty.

Data is stored in such a way as to minimize the risk of their alteration, deletion or dispersion.

The Company keeps Personal and Particular Data:

- on paper at: Via Brunacci n. 9-B, Marghera-Venezia (VE), Italy (almost exclusively non-digitalised invoices and contract documents);
- in digital format on:
 - 1) server owned by the Company at the data-centre in Milan, managed by Equinix, with office in Milan in Via Feltre n. 28/6;
 - 2) server owned by the Company in Venice – Marghera, via Brunacci n. 9/B;
 - 3) company-owned servers in “Cloud NEEN” (at Via Savona 125, Milan, Italy);
 - 4) AMAZON Cloud for statistics purposes (aggregated data);
 - 5) CRM Nethunt Cloud, in Belize City, 56 Daly Street

The Company’s servers are accessed by the fixed and portable computers at the premise in Marghera-Venezia in Via Brunacci n. 9/B, for the exclusive use of the Company’s partners, administrators, staff, collaborators and interns.

Data collected in printed format are destroyed with a dedicated document-shredder.

Data regarding any curricula that are not used in any formal recruitments are deleted within 6 months of receipt.

Data relating to pre-contractual negotiations that are not contractually signed are deleted within 6 months after the last pre-contractual contact.

The retention period may be extended if required by legal and contractual reasons, such as interruption or suspension of the statute of limitations, litigation, administrative procedures and any other cause or circumstance that requires or recommends data retention to be continued.

INTERNET ACCESS PROTECTION CRITERIA

Access to the internet using the Company's devices is via cable or Wi-Fi, always password-protected and never in "open" mode.

SECURITY

The Company undertakes to take all appropriate organizational, technical and administrative measures to protect Personal Data. As no data transmission or storage system can be considered 100% secure, should you discover any breach and/or dispersion of Personal Data, please notify us immediately in writing to our certified e-mail: netstorming@legalmail.it, normal e-mail: admin@netstorming.net or by recorded-delivery letter at the above address.

RIGHTS OF THE DATA SUBJECT

As an interested party, you may exercise, at any time, the rights provided for in the Regulations against the Data Controller by sending a written request by certified e-mail to: netstorming@legalmail.it, by normal e-mail to: admin@netstorming.net or by recorded-delivery letter to the address mentioned above.

If a means of contact other than certified e-mail or the Italian Post Office recorded-delivery letter is used, the Company does not assume responsibility for the failed, incomplete, irregular or delayed delivery of communications.

You may revoke the consent expressed in this Data-Protection Policy Statement at any time in the same manner.

Any communications and actions taken by the Company in exchange for exercising your rights will be made free of charge; however, should your requests prove manifestly unfounded or excessive, in particular due to their repetitive nature, the Company may charge you a contribution, taking into account the administrative costs incurred, or refuse to meet your requests.

You may obtain confirmation from the Company as to whether your Personal Data is being processed, even if not yet recorded and, if so, obtain access to your Personal Data and information as set forth in Art. 15 of the Regulations.

If requested, the Company may provide you with a copy of the Data that is processed, provided that the release of such copy does not prejudice the rights and freedoms of others. For any additional copies, the Company may charge you a reasonable expense contribution based on administrative costs. If the request in question is made by electronic means, and unless otherwise specified, the information will be provided to you by the Company in a commonly-used electronic format.

You may require the Company to rectify any inexact data and, taking into account the purposes of the processing, that they be integrated to if they are incomplete, by providing an integrative statement. Such rectification will be communicated to the recipients to whom your Personal Data has been transmitted unless this proves impossible or involves a disproportionate effort; the Company will notify you of such recipients upon request.

You may also require the Data Controller to delete your Personal Data ("Right to be forgotten") if one of the reasons provided for in Art. 17 of the Regulations exists, including:

- a) Your Personal Data are no longer necessary for the purposes for which they were collected or otherwise processed;
- b) The Data Subject withdraws their consent on which the processing is based, and if there is no other legal basis for the processing;
- c) The Data Subject opposes the processing for reasons related to their particular situation, and there are no overriding legitimate grounds for processing, or opposes processing for direct-marketing purposes;
- d) Personal Data have been unlawfully processed;
- e) Personal Data must be deleted in order to comply with a legal obligation under EU law, or

the law of the Member State to which the Data Controller is subject.

The cancellation will be communicated to each of the recipients to whom your Data has been transmitted unless this proves impossible or involves a disproportionate effort; the Company will notify you of such recipients if you request it.

Please note that the Company will not be able to delete your Data if their processing is necessary, for example: to fulfil a legal obligation, for reasons of public interest, or to ascertain, exercise or defend a right in court.

You may obtain the limitation of the processing of your Personal Data if one of the cases provided for in Art. 18 of the Regulation applies, including, for example:

- a) the Data Subject contests the accuracy of the Personal Data for the period necessary for the Data Controller to verify the accuracy of such Personal Data;
- b) the processing is unlawful and the Data Subject opposes the cancellation of their Personal Data and requests instead that their use be limited;
- c) although the Data Controller no longer needs them for the purposes of processing, the Personal Data are necessary for the Data Subject to ascertain, exercise or defend a right in court;
- d) the Data Subject has objected to the processing for reasons related to their particular situation, pending verification that the legitimate reasons of the Data Controller take precedence over those of the Data Subject.

The limitation will be communicated to each of the recipients to whom your Personal Data has been transmitted unless this proves impossible or involves a disproportionate effort; the Company will notify you of such recipients upon request.

If the processing of your Personal Data is based on consent or is necessary to execute a contract or for pre-contractual measures and the processing is carried out by automated means, you may: request to receive the Personal Data provided by you in a commonly used, machine-readable, structured format (example: computer and/or tablet); transmit your received Personal Data to another Data Controller without hindrance by the Company provided this portability does not affect the rights and freedoms of others.

You may also request that your Personal Data be transmitted by the Company directly to another Data Controller indicated by you, if technically feasible. In this case, it will be your responsibility to provide us with all the exact details of the new Data Controller to whom you intend to transfer your Personal Data, providing us with written authorization.

Your right to lodge a complaint with the Guarantor Authority remains unaffected.

RIGHT OF OPPOSITION

At any time, you may oppose to the processing of your Personal Data if the processing is carried out for the performance of an activity in the public interest or for the pursuit of a legitimate interest of the Data Controller (including profiling activities), and you will always have the right to the portability of

the Data until they are legitimately deleted.

Should you decide to exercise the right of opposition described herein, the Company will refrain from processing your Data further unless there are legitimate reasons to continue processing (reasons prevailing over the interests, rights and freedoms of the Data Subject), or the processing is necessary to ascertain, exercise or defend a right in court.

If the Data are processed for direct-marketing reasons, you have the right to object at any time to the processing of the Data concerning you carried out for such purposes, including profiling to the extent that it is related to such direct-marketing activity. If you object to the processing for direct-marketing reasons, your Personal Data will no longer be processed for such purposes.

NOTIFICATION TO THE SUPERVISORY AUTHORITY OF A PERSONAL-DATA BREACH

If the violation of Personal Data is likely to present a high risk for the rights and freedoms of individuals, the Data Controller will notify you of the violation without undue delay.

The above communication will not be required if one of the following conditions is met:

- the Data Controller has put in place the appropriate technical and organizational protection measures and these measures were applied to the Personal Data subject to the violation, in particular those (such as encryption) intended to make the Personal Data incomprehensible to those with unauthorized access;
- the Data Controller has subsequently taken measures to prevent a high risk to the rights and freedoms of Data Subjects;
- such communication would require disproportionate efforts. In such a case, a public communication or similar measure shall be made by means of which the Data Subjects concerned will be informed with similar effectiveness.

UPDATES TO THIS DATA-PROTECTION POLICY STATEMENT

This Data-Protection Policy Statement is subject to periodic review. The changes will apply when the updated version is published on the website of NETSTORMING SRL www.netstorming.net, and posted in its offices. Your use of our Services as a result of such changes will result in full acceptance of the version as updated by the Company.

HOW TO CONTACT US

For any information on this Data-Protection Policy Statement, you may write to the certified e-mail address: netstorming@legalmail.it, to the regular e-mail: admin@netstorming.net, or to send a recorded-delivery letter to the above address.

Since e-mail communications are not always secure, please do not include any particular Data, or any credit-card numbers.

