

INFORMATION LETTER ON THE PROCESSING OF PERSONAL DATA

(art. 13 and 14 Reg. UE 2016/679 and Legislative Decree 196/2003 and subsequent amendments)

Dear,

Below we provide you with some information that you need to bring to your attention, not only to comply with legal obligations, but also because transparency and fairness towards interested parties are a fundamental part of our activity.

Who is the data controller?

The Data Controller of your personal data, responsible towards you for the legitimate and correct use of your personal data, is **PALLADIO GROUP**, in the person of the parent company Palladio Group S.p.A. (identified according to the definition of "entrepreneurial group" set out in art. 4.19 of EU Regulation 679/2016), which you can contact for any information or request at the following **addresses**:

Head office	Via Cresole n. 8, 36031 Dueville (VI), IT
Telephone	+39 0444 947111
E-mail	info@palladiogroup.com
Web site	www.palladiogroup.com

For processing that includes the publication of content on social networks, the Data Controller has concluded standard co-processing agreements with the data controllers of the social platforms.

Who is the Data Protection Officer?

The data controller has appointed a Data Protection Officer (DPO) who can be contacted at the following address:

E-mail	dpo@palladiogroup.com
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Where are the data collected?

Your data is communicated by you, including while browsing the website and/or by other subjects, such as, for example, third party service providers and/or collected from publicly accessible sources such as social networks.

Is there an obligation to provide data?

Except for purposes based on consent, the provision of your data is a necessary requirement: failure to provide the data indicated as mandatory could lead to legal and contractual consequences while failure to provide the data indicated as optional could make it impossible to carry out the processing or lead to a partial processing thereof. Therefore, in case of failure to provide them, you may not obtain the expected result or obtain it only partially.

For what purposes are the data collected and processed?

The Data Controller collects and processes your personal data using automated, semi-automated and non-automated methods for purposes related to allowing navigation on the website, which are lawful on the basis of the execution of the contract or the legitimate interest of the data controller or third parties. The table below shows the data processing analytically with details on the purpose, legal basis, type of data, specific recipients and retention terms

To whom are the data communicated?

As part of the processing activities, your data may be communicated to:

- authorized subjects, as identified in the specific register kept by the Data controller, therefore employees and other internal subjects,
- external parties who process the data on behalf of the Data Controller, duly instructed and bound through contracts of appointment as data processor (as identified in the specific register kept by the data controller),
- other organizations belonging to the entrepreneurial group,
- public authorities at their request or due to communication obligations incumbent on the data controller,
- other subjects for whom the communication of data is necessary for carrying out the declared purposes of the

data controller, as per the specifications for each processing in the table below.

How is the data stored?

Your personal data is stored securely in compliance with the cancellation terms identified and reported below. However, consider that the data may be retained for the time necessary for the statute of limitations to accrue in relation to mutual rights and the retention time of backups.

Are the data subject to transfer?

The processing of personal data (e.g. storage, archiving and conservation of data on its own servers or in the cloud) is limited to the areas of circulation and processing of personal data in countries belonging to the European Union, with an express prohibition on transferring them to countries non-EU which do not guarantee (or in the absence of) an adequate level of protection, or, in the absence of protection instruments provided for by EU Regulation 2016/679 (third country deemed adequate by the European Commission, group BCR, model contractual clauses, consensus of interested parties, etc.). You can request more information by contacting the data controller.

Are automated data processing carried out?

For the pursuit of the purposes mentioned, automated activities may be carried out (decision-making processes carried out through the use of technological tools, without human intervention), these include profiling, therefore the collection of information about you in order to analyze your characteristics and insert them into categories, groups or be able to make evaluations, such as sending personalized advertising material based on your previous choices in using the site, or forecasts.

What rights can be exercised?

You have the right to ask the data controller for access to your personal data and for the rectification, cancellation and portability of the same or the limitation of the processing that concerns you or to oppose their processing.

If you have provided consent for one or more specific purposes, you have the right to revoke this consent at any time, without prejudice to the lawfulness of the processing based on the consent given before the revocation.

You also have the right to lodge a complaint with the following Supervisory Authority: Guarantor for the protection of personal data, with headquarters in Piazza Venezia 11, 00187 – Rome – protocollo@pec.gdpc.it.

To exercise your rights or to request additional information, you can contact the data controller via the contact information above.

Can the information in this policy change?

The Data Controller may update this information on personal data in accordance with applicable laws. Any changes will be communicated appropriately and the update date will always be visible in the information. It is suggested that you regularly check the information and, if necessary, request an updated copy from the Data Controller.

Tab. A

What specific data processing is carried out?

Processing	Web and Cookie
Purpose	Website provision, optimization, statistics and security
Legal Basis	Article 6, par. 1, letter b): Execution of the contract or pre-contractual measures Art. 6, par. 1, letter f): Pursuit of the Data Controller's legitimate interest
Data processed	Common data (in particular: Data relating to the provision of an electronic communications service (traffic data, data relating to internet browsing, other...) Access and identification data (username, password, customer ID, other...)

Specific recipients	Authorized as identified in the register of authorized parties Data processors as identified in the register of data processors Other subjects for whom the communication of data is necessary for the purposes of carrying out the Data Controller's declared purposes, including suppliers of third-party services (e.g. Google for Recaptcha and Analytics)
Storage	10 years from the year of termination of the contractual relationship for accounts, passwords and user names;

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