

## SERVIZI INDUSTRIALI GENOVA SIGE S.r.l.

Amministrazione, uffici e laboratori:  
Via Castel Morrone, 15 H – 16161 Genova  
Tel.: 010 7406583 – Fax: 010 7406584  
E-mail: [segreteria@sigge.ge.it](mailto:segreteria@sigge.ge.it)  
Sito web: <http://www.sigge.ge.it>

Sede Legale:  
Piazza della Vittoria 7/14 – 16121 Genova  
C.C.I.A.A. Genova n. 289645  
Trib. Reg. Soc. n. 43610 – Fascicolo 61795/425  
Codice Fiscale e Partita I.V.A.: it 02687740106  
Capitale Sociale interamente versato € 90.000



### **WEB MARKETING PRIVACY POLICY**

*pursuant to articles 13 and 14 of European Regulation 679/2016 - protection of personal data processing*

The Company **SERVIZI INDUSTRIALI GENOVA SIGE S.R.L.** as the owner of the processing of personal data, pursuant to and for the purposes of Article 13 of European Regulation 2016/679 (GDPR) and following Legislative Decree 101/2018 adapting Legislative Decree 196/2003 (Personal Data Protection Code), as well as European or national legislative interventions and/or measures of the Supervisory Authorities subsequent to this one is required to provide some information regarding the use of your personal data as a CLIENT or WEB USER.

#### **Categories of personal data**

The data processed are common personal data and identification data (in general: name, surname, e-mail, telephone number) provided by you, as CLIENT or WEB USER (physical person and/or referent of legal entity), or provided by third parties, and relating to you or to third parties, collected and processed by us or by other parties, or processed in the performance of relations with the Owner.

#### **Purpose and legal basis of the processing**

Personal data are processed by the Owner for:

- sending periodic informative newsletters (your request made via the newsletter subscription web form)
  - Periodicity > monthly or, if necessary, bi-weekly (when there are a high number of news items)
  - Contents > regulatory updates and informative material on environment and safety at work, SIGE courses and services
- sending emails in response to your enquiries (your request made via the web contact form)
- sending emails in response to your application (your request made via the application web form);
- managing participation in online or in-person events you have requested to attend.

The processing operations described above require your consent, which you can express directly when drafting your application by viewing the privacy policy and ticking the appropriate box.

#### **Provision of data and consequences of failure to provide data**

The provision of data is necessary for the management of your request and to comply with the law. Therefore, failure to provide such personal data, or providing partial or incorrect data, will make it objectively impossible for the Owner to fulfil your request.

#### **Treatment methods**

The processing of personal data is based on principles of correctness, lawfulness and transparency. The processing may be carried out using manual, electronic and IT tools in a manner strictly related to the purposes for which the data are processed and in compliance with the provisions of Article 32 GDPR on security measures and through the use of appropriate procedures that avoid the risk of loss, unauthorised access, unlawful use and dissemination.

#### **Data recipients**

The personal data processed by the Owner shall not be disseminated, i.e. it shall not be disclosed to unspecified persons, in any possible form, including making it available or simply consulting it. The data may be communicated to employees of the Owner who are authorised to process personal data within the limits of their assigned role and in accordance with the instructions given to them by the Owner. They may also be communicated, when strictly necessary, to external parties who collaborate with the Owner and who are designated as Data Processors, to parties who, for the purpose of processing requests or providing services relating to the relationship with the Owner, must perform services on behalf of the Owner (e.g. web and IT consultancy companies). Lastly, the data may be communicated to the subjects entitled to access them by virtue of provisions of the law, regulations and Community legislation.

#### **Data transfer**

The Owner does not transfer your data to third-party countries or to international organisations outside the EU.

The data are stored on servers located within the European Union. In all cases, it is understood that the Owner, if necessary, may move the servers outside the EU. In this case, the Owner guarantees as of now that the transfer of data outside the EU will take place in compliance with the applicable legal provisions, also through the provision of standard contractual clauses envisaged by the European Commission and the adoption of binding corporate rules for intragroup transfers.



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### **Data retention**

The Owner shall retain and process the personal data for the time necessary to fulfil the purposes indicated and as long as a relationship of legitimate interest exists and in any case no later than the date on which you inform us that you wish to terminate such relationship (please see "Exercise of rights" below). If the Owner has a documented need to retain the data for a longer period (for example, in the event that deletion might compromise a legitimate right of defence or, in general, for the protection of its corporate assets), further retention may take place by limiting access to the data only to the legal representative and the legal function, in order to ensure the legitimate exercise of the Owner's right of defence.

### **Rights of the interested party**

The Owner informs you that, as a data subject, if the limitations provided for by law do not apply, you have the right to:

- a) request confirmation as to whether or not your personal data is being processed;
- b) access your personal data, obtaining evidence of the purposes pursued by the Owner, the categories of data involved, the recipients to whom the data may be communicated, the applicable storage period, the existence of automated decision-making processes;
- c) obtain, without delay, the rectification of any inaccurate personal data concerning him/her and the notification thereof to those to whom the data may have been transmitted;
- d) to obtain, in the cases provided for, the cancellation of their data and the relative notification to those to whom the data may have been transmitted. This right may be exercised at any time:
  - by clicking on the unsubscribe link at the bottom of all newsletters sent by SIGE via MailUp;
  - by writing to the email address [privacy@sige.ge.it](mailto:privacy@sige.ge.it) provided at the bottom of each newsletter;
  - by following the instructions in the welcome email received at the time of the first subscription;
- e) obtain restrictions as to its processing, when provided for;
- f) object to the processing of personal data, where applicable;
- g) request and obtain the transfer of personal data in the established cases and in a structured, commonly used and machine-readable format, also in order to transmit such data to another Owner, within the limits of the material feasibility of the operation and the costs to be incurred
- h) lodge a complaint with the Italian Data Protection Authority.

### **Exercise of rights**

You may exercise your rights by writing to the address of the Company, Owner, listed below or to the following e-mail address [privacy@sige.ge.it](mailto:privacy@sige.ge.it)

### **Owner**

The Owner you may apply to is **SERVIZI INDUSTRIALI GENOVA SIGE S.R.L.**, P.I. 02687740106, with operational headquarters at Via Castel Morrone 15H - 16161 Genoa.

### **Complaint procedure**

Without prejudice to any other administrative or judicial action, the data subject has the right to lodge a complaint with the supervisory authority. For further information please visit the institutional website of the Garante della Privacy: [www.garanteprivacy.it](http://www.garanteprivacy.it)

