

Privacy Policy

This document describes the regulatory principles of data processing carried out by CIAM S.p.a. (having its registered office in Assisi (PG), Viale dei Pini n.9, hereinafter also "Company"), as the data controller.

The data acquired by Ciam S.p.a. in the performance of the services carried out, are processed in accordance with the provisions of EU Regulation No. 679/2016, "*on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC*" (hereinafter "Regulation" or "GDPR"). Information regarding the cookie policy adopted by the company for this website, is contained in the cookie policy session of the website.

Data controller

The data controller is:

Ciam S.p.a., Viale dei Pini No. 9, Assisi (PG)

You may contact Ciam at any time to exercise your rights as specified in this document at privacy@ciamgroup.it

Data Processors

In order to carry out its services, the Controller uses Data Processors, appointed pursuant to Article 28 of EU Regulation 679/16.

The Data Controller has designated a **Data Protection Officer**, possessing specialized knowledge of data protection regulations and practices who is therefore capable of fulfilling the tasks set forth in Article 39 of EU Reg. 679/2016, identified in Lawyer Silvia Mezzancella, who can be contacted at the following email address DPO@ciamgroup.it.

1. Object of

processing

Processing operations may involve:

- Biographical data (first name, last name, address, date and place of birth, cv)
- Contact information (e-mail and phone number),
- Customer data, customer employees, corporate data

2. Purposes of the processing for which the data are intended (art. 24 lett. a, b, c Privacy Code and art. 6 lett. b, e GDPR)

The data processed will be processed for the purposes - from time to time - specified in appropriate information provided before accessing each service.

Specifically, the personal data (Data) collected may be processed for the following purposes:

- a) to execute a specific request of the user, supplier or customer by providing the requested service;
- b)

to allow the Company to carry out surveys aimed at improving the quality of the products and services provided, by virtue of the Company's legitimate interest ("Customer Satisfaction");

- c) with the consent of the data subject, to send commercial and/or promotional communications about the Company's products and services, as well as to carry out market research ("Marketing");
- d) to improve the user's experience on the Company's websites;
- e) register with the Ciam Club platform in the appropriate section available on the website;
- f) submit their application through the section on the "Work with Us" website.

Data may be processed by paper, automated or electronic means and, in particular, by regular mail or email, telephone, fax and any other computer channel

3. Methods of data processing (art. 4 Privacy Code and art. 5 GDPR

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Personal data will be processed, including through the use of computerized tools, in accordance with the methods specified in the GDPR, which provides, among other things

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- processed in accordance with the principles of lawfulness, transparency and fairness;
- collected and recorded for specified, explicit and legitimate purposes ("purpose limitation");
- adequate, relevant, and not excessive in relation to the formalities of processing ("data minimization");
- exact and up-to-date ("exactness");
- retained for a period of time not exceeding the achievement of the purposes for which they are processed ("retention limitation");
- processed by means that ensure their security and confidentiality, including protection from unauthorized or unlawful processing and accidental loss, destruction or damage ("integrity and confidentiality").

Personal data are retained for the duration necessary for the agreed contractual fulfillments and in any case for the purpose of maintaining accounting records and to resist in the event of any disputes arising.

In the case of data processing for marketing purposes, the Data Controller will process personal data no later than 36 months after the collection of consent to the processing, which consent may be revoked at any time without affecting the lawfulness of the processing carried out prior to the revocation.

4. Legal basis

The legal basis for the processing carried out is the fulfillment of contractual obligations, pre-contractual and legal measures in order to manage the contract agreed with the client in the execution of the specific project.

5. Transfer and/or disclosure of data

Processed

data may be disclosed to other companies in the group.

As part of the Company's contractual relationships, Data may be transferred outside the territory of the European Economic Area (EEA), including through the inclusion of the same in databases managed by third-party companies, operating on behalf of the Company. The management of the databases and the processing of the Data are bound to the purposes for which they were collected and are carried out in strict compliance with the applicable data protection law.

Whenever Data is to be transferred outside the EEA, the Company will take all appropriate and necessary contractual measures to ensure an adequate level of Data protection.

6. Rights of the data subject (art. 7 Privacy Code and art. 15 - 21 GDPR)

For each service provided, it will be possible to exercise the rights

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- of access to personal data, requesting that these data be made available to him in an intelligible form, as well as the purposes on which the processing is based (ex art. 15);
- to obtain rectification (ex art. 16) or cancellation (ex art. 17) of the same or limitation of processing (ex art. 18);
- To obtain data portability (ex art. 20);
- To object to the processing of data (ex art. 21);
- To file a complaint with the competent supervisory authority.

The above-mentioned rights can be asserted, addressing requests to the following e-mail address

privacy@ciamgroup.it

In this regard, we also point out that the Data Protection Officer (DPO) appointed by the Company, Attorney Silvia Mezzancella can be contacted at the following e-mail address DPO@ciamgroup.it.

7. Nature of data provision and consequences of failure to provide data

The provision of data is necessary for the exact performance of contractual and pre-contractual obligations incumbent on the Company, and failure to provide them will result in the impossibility of concluding the contract.