

#### **NOTICE**

# pursuant to and in accordance with article 13 of EU Regulation 27 April 2016 no. 679 "General Data Protection Regulation"

#### Introduction

This Privacy Policy is intended to describe the modes of management of this site, in reference to the processing of the personal data of users/visitors.

It is a notice, provided within the meaning of Article 13 of EU Regulation 679/16 in the matter of protection of personal data, addressed to the visitors of the Internet site of OPAC S.r.l. at the URL www.opacgroup.com.

This notice is provided only for the site mentioned above and not also for other web sites possibly visited by the user through links on the site. The site www.opacgroup.com is the property of **OPAC S.r.l.** and is managed by **OPAC S.r.l.**, also using specific suppliers, which ensures the respect of the requirements of EU Regulation 679/16.

Users/visitors must carefully read this notice before providing their consent and submitting any personal information and/or filling in any electronic form on the site.

## Data processing aims and lawfulness

Collection and processing of personal data is made in order to:

provide specific information about products/services of OPAC S.r.l.;

and will be processed based on principles of correctness, lawfulness, transparency, and protection of your privacy and your rights.

The personal data that the Data Controller may collect are the following:

a) general data (name, e-mail address);

The lawfulness of the processing is based on:

• explicit consent (ex art. 6.1(a) of the GDPR).

## Processing methods.

Data processing for the purposes related to the access to the site of the Company occurs with automated methods, on electronic or magnetic media, in compliance with the privacy and security rules provided for by the law, the ensuing regulations and the internal provisions. The data is always processed in full compliance with the principle of proportionality of the processing on the basis of which all the personal data and the various processing methods must be relevant and not excessive in relation to the aims pursued. Stored data





is protected by suitable safety measures, so as to reduce the risk of accidental loss or unauthorized access or processing not allowed or not complying with the stated purposes. An automated decision-making process is not in place.

## Place of processing

Data is processed and stored at the premises of Rivalta di Torino, Via Bruino 26.

## Mandatory nature of the provision of the data and consequences of a possible refusal to provide it

The provision of the data is not mandatory for access and/or consultation of the site, while it is mandatory in order that **OPAC S.r.l.** can provide information; therefore, the possible refusal to provide it in whole or in part may give rise to the impossibility for **OPAC S.r.l.** to provide additional information.

#### **Data communication**

The data can be transferred to professionals and/or companies responsible for carrying out technical and development activities, as well as to employees/collaborators of **OPAC S.r.I**.

#### Transfer of data abroad

Your personal data will not be communicated to other companies with headquarters in countries outside Europe.

#### **Data retention times**

Your personal data will be stored for 36 months. If contractual relations with **OPAC S.r.l.** are formalized, the data subject will be given appropriate information that specifies the lawfulness in relation to the type of subsequent processing.

## Rights of the data subject

With regard to the personal data, the employee may exercise the rights provided for in Chapter III of the EU Reg. 2016/679 (which is enclosed), within the limits and under the conditions laid down in Articles 15 - 23 of the abovementioned Regulation. In particular, **OPAC S.r.l.** guarantees and recognizes to the data subjects the exercise of the following rights:

- the right to access personal data in its archives in paper and/or electronic format;
- the right to request corrections, updating and deletion, if incomplete or erroneous, as well as to object to its processing for legitimate and specific reasons;
- the right to obtain the correction of incorrect personal data without undue delay. Taking into
  account the purposes of processing, the data subject has the right to obtain the integration of the
  personal data that may be incomplete, also providing a supplementary statement;



- the right to obtain the deletion of the personal data that concern him without undue delay, if one of the reasons referred to in Article 17, paragraph 1 of the Regulation applies;
- The right to obtain the limitation of the processing when one of the cases referred to in art. 18,
   paragraph 1 of the Regulation occurs;
- the right to lodge a complaint with a supervisory authority, as well as to exercise the other rights recognized by the applicable legislation.

The data subject can exercise his rights by contacting the Data Controller at the addresses below.

#### **Data Controller**

The rights under discussion may be exercised, also through a representative, sending a request to the **Data Controller** contactable at the premises of the company in via Bruino 26 - Rivalta di Torino (TO) – Phone +39 011 9038581 or at the following e-mail address: <u>u.direzione@opacgroup.com</u>.

**The Data Controller** is **OPAC S.r.I.**, via Bruino 26 - Rivalta di Torino (TO) – Phone +39 011 9038581 represented by its Legal Representative. E-mail <u>u.direzione@opacgroup.com</u>

The full text of the EU regulation 2016/679 (GDPR) is available at the site of the European Union https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016R0679&from=IT

Rivalta di Torino, 23 May 2018

OPAC S.r.l.



### ANNEX: EXCERPT FROM CHAPTER III "RIGHTS OF THE DATA SUBJECT" EU Reg. 2016/679

## Article 15- Right of access by the data subject

- 1. The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information:
- (a) the purposes of the processing;
- (b) the categories of personal data concerned;
- (c) the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
- d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- e) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
- f) the right to lodge a complaint with a supervisory authority;
- g) where the personal data are not collected from the data subject, any available information as to their source;
- h) the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.
- 2. Where personal data are transferred to a third country or to an international organisation, the data subject shall have the right to be informed of the appropriate safeguards pursuant to Article 46 relating to the transfer.
- 3. The controller shall provide a copy of the personal data undergoing processing. For any further copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs. Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form. 4. The right to obtain a copy referred to in paragraph 3 shall not adversely affect the rights and freedoms of others.