

GDPR PRIVACY POLICY

Information provided pursuant to Art.13 of Reg. EU 2016/679 (hereinafter GDPR)

Introduction: the importance of data protection for Douglas Chero

Douglas Chero considers the protection of its stakeholders, with regard to the processing of personal data, a fundamental right. Transparency towards the interested parties is therefore a primary objective, pursued through data protection policies, as well as through effective communication tools aimed at making basic information on data processing available. This information is therefore aimed at providing detailed information to stakeholders, with specific reference to the various types of data processed.

General information

Users (data subjects, as GDPR, Art.4, c1) are informed of the following general profiles, valid for all areas of processing:

- all personal data are processed in compliance with the applicable privacy regulations in force (EU Reg. 2016/679 and Legislative Decree 196/2003, as amended by Legislative Decree 101/2018);
- all User data are processed in a lawful, correct and transparent manner, in compliance with the general principles set out in Article 5 of the GDPR;
- specific security measures are observed to prevent data loss, illicit or incorrect use and unauthorized access, pursuant to Article 32 of the GDPR.

Data Controller

The Data Controller is the undersigned Company (in the person of its pro-tempore legal representative) who can be contacted for any request regarding privacy or to exercise the rights listed below, at the following addresses:

Nome: Douglas Chero Spa - Email: douglas-security@douglas-cherо.com

Data subject's rights

- right to request the presence and access to personal data concerning him (Article 15 "Right of access");
- right to obtain the rectification / integration of inaccurate or incomplete data (Article 16 "Right to rectification");
- the right to obtain, if there are justified reasons, the cancellation of data (Article 17 "Right to erasure");
- right to obtain the limitation of processing (Article 18 "Right to restriction");
- right to receive the data concerning him in a structured format (Article 20 "Right to portability");
- right to object to the processing and to automated decision-making processes, including profiling (Articles 21, 22 "Right to object");
- right to revoke a previously given consent;
- the right to submit, in the event of non-response, a complaint to the Data Protection Authority.

The following specific information is provided below, referring to:

- 1) data processing related to website navigation
- 2) data processing of customers / suppliers
- 1) data processing for videosurveillance;
- 2) other categories of data processing;
- 3) privacy policy update.

1) DATA PROCESSING RELATED TO WEBSITE NAVIGATION

1.1 Navigation data

The IT systems and the software procedures used in the operation of this web site acquire, in the course of their normal processing, some personal data, the transmission of which is necessary in the use of the Internet communication protocols. These deal with information that is not gathered to be associated to identified parties, but which by their nature could, through processing and associations with data held by third parties, allow the identification of the users. Under this category of data we find the IP addresses or the computer domain names used by the users that connect to the site, the addresses in URI (Uniform Resource Identifier), notation of the resources requested, the time of the request, the method used in submitting the server request, the dimension of the file received, the numeric code indicating the status of the answer given by the server (successful, error, etc.) and other parameters related to the operating system and the user's IT environment.

Purpose and legal basis of the processing (GDPR-Art.13, paragraph 1, letter c)	This data is used only for the purpose of receiving anonymous statistical information on the use of the site and to control its correct functioning. The data could moreover be used to ascertain the responsibility in case of presumed IT crimes to the damage of the site (legitimate interests of the owner).
Scope of knowledge (GDPR-Art.13, paragraph 1, letter e,f)	The data is processed exclusively by in-house staff, duly authorised and trained in data processing (GDPR-Art.29) and shall not be disclosed to external parties, diffused, or transferred to countries outside the EU. Only in cases of investigation, this data may be placed at the disposal of the competent authorities.
Data retention (GDPR-Art.13, paragraph 2, letter a)	This data is usually kept for brief periods, with the exception of possible prolonged connections related to investigation activities.
Data provision (GDPR-Art.13, paragraph 2, letter f)	The data is not submitted by the party involved but acquired automatically by the site's technological systems.

1.2 Cookies

The management of cookies is aligned with the relevant regulatory requirements:

- "Guidelines for cookies and other tracking tools" of 10 June 2021 (Published in the Official Gazette no. 163 of 9 July 2021);
- "Guidelines 5/2020 on consent" pursuant to regulation (EU) 2016/679, adopted by the European Data Protection Board.

Users can check the types of cookies and set their preferences through the appropriate banner (if provided), as well as through the appropriate tools provided by the main navigation browsers. Some general information about cookies and similar technologies is provided below.

What cookies are Cookies are brief fragments of texts (letters and/or numbers) that allow the web server to memorise on the client browser information to be reused in the course of the same visit to the site (session cookies) or subsequently, also after days (persistent cookies). The cookies are memories, according to the user's preferences, by the single browser on the specific device used (computer, tablet, smartphone). Similar technologies like for example, web beacons, transparent GIFs and all the types of local storage introduced with HTML5, can be used to gather information on the user's behavior and the use of the services. After this circular letter we shall refer to the cookies and all the similar technologies by using only the term "cookie". The following table shows the main types of cookies.

TYPE	PURPOSE	PREFERENCE MANAGEMENT
Technical session cookies	Ensure normal navigation and use of the site	Through the main browsers it is possible to: <ul style="list-style-type: none"> • Block the reception of all (or some) types of cookies by default • View the analytical list of cookies used • Remove all or some of the cookies installed For information on the settings of individual browsers, see the specific paragraph. It should be noted that blocking or deleting cookies could compromise the navigability of the site.
Analytical cookies	Collect information on the number of visitors and pages viewed	
Functional technical cookies	Allow navigation according to a series of selected criteria	
Profiling cookies	Create user profiles in order to send advertising messages in line with preferences	

The site uses only technical and functional cookies.

1.3 Data provided voluntarily by Users

The optional, explicit and voluntary sending of messages to contact addresses, private messages sent by users to institutional profiles/pages on social media (where this possibility is provided), as well as the compilation and forwarding of any forms/modules present, involve the acquisition of the sender's contact details, necessary to reply, as well as all personal data included in the communications. The sender therefore remains personally responsible for the accuracy of the data provided, as well as their pertinence and non-excess with respect to the requests in question.

2) DATA PROCESSING OF CUSTOMER / SUPPLIERS

2.1 Object of the processing

The company processes personal identification data of customers/suppliers (for example, name, surname, company name, personal/fiscal data, address, telephone, e-mail, bank and payment references) and their operational contacts (name, surname and data contact details) acquired and used in the context of the provision of the products/services supplied.

2.2 Purpose and legal basis of the processing

The data is processed for:

- conclude contractual/professional relationships and provide related services;
- fulfill the pre-contractual, contractual and tax obligations deriving from existing relationships, as well as manage the necessary communications connected to them;
- fulfill the obligations established by law, by a regulation, by community legislation or by an order from the Authority;
- exercise a legitimate interest as well as a right of the Data Controller (for example: the right of defense in court, the protection of credit positions; ordinary internal operational, managerial and accounting needs).

Failure to provide the aforementioned data will make it impossible to establish the relationship with the Data Controller. The aforementioned purposes represent, pursuant to Article 6, paragraphs b, c, f, suitable legal bases for the lawfulness of the processing. If you intend to carry out treatments for different purposes (eg: marketing communications, production of photo/video content, etc.) a specific consent will be requested from the interested parties.

2.3 Processing methods and storage time

The processing of personal data is carried out by means of the operations indicated in the Art. 4 no. 2) GDPR and precisely: collection, registration, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, cancellation and destruction of data. Personal data is subjected to both paper and electronic processing. The Data Controller will process the personal data for the time necessary to fulfill the purposes for which they were collected and related legal obligations (usually coinciding with the relationship with the interested party, without prejudice to the extension with reference to the obligations to keep administrative documentation and of business correspondence).

2.4 Scope of processing

The data is processed by duly authorized and trained internal subjects pursuant to Article 29 of the GDPR. It is also possible to request the scope of communication of personal data, obtaining precise indications on any external subjects who operate as independent data processors or data controllers (eg: consultants, technicians, banks, carriers, etc.). The data may be communicated to any subsidiary/associated company for various reasons. The data are not subject to dissemination or transfer outside the EU (they may be transferred outside the EU only in compliance with the conditions set out in Chapter V of the GDPR, aimed at ensuring that the level of protection of the data subjects is not compromised "Art.45 Transfer on the basis of an adequacy decision, Art.46 Transfer subject to adequate guarantees, Art.47 Binding corporate rules, Art.49 Specific exceptions"). The data are not subject to automated processes that produce significant consequences for the data subject.

3) DATA PROCESSING FOR VIDEOSURVEILLANCE

In addition to the information provided to interested parties by means of signs displayed in areas where video surveillance systems are in operation, we hereby inform you that:

- the processing of personal data through video surveillance systems takes place in compliance with current privacy regulations (EU Reg. 2016/679 "GDPR"; Legislative Decree 196/2003, as amended and integrated by Legislative Decree 101/2018; General Provisions of the Authority for the protection of personal data, expressly recognized by art. 22, paragraph 4 of Legislative Decree 101/2018)
- the system is installed for PROTECTION OF ASSETS/SECURITY purposes and the use of the cameras is aimed at protecting property, people and assets against possible intrusions, fires, thefts, robberies or acts of vandalism and the possible defense of the rights of the Owner in court (acquisition of evidence);
- the access or passage of the interested parties in the video-surveillance areas necessarily involves the recording of images that may concern them;
- the images collected may be recorded and stored for the period of time strictly necessary to achieve the purpose indicated above, and in any case for a period of time not exceeding the terms established by law (never exceeding 7 days), except for any longer period necessary to comply with specific requests from the judicial authority or the judicial police in relation to ongoing investigative activities; at the end of the expected storage period, the recorded images are deleted from the relevant electronic, computer or magnetic media;
- the images may be processed exclusively by formally authorised and trained personnel or by external companies that, as data controllers, collaborate in the maintenance of the systems and surveillance activities; they are not communicated or distributed in any way outside the owner's structure, except for the execution of any orders from the judicial authority or the judicial police or, in the event of illicit activities, use in any judicial offices;
- the images will be processed with tools and methods suitable to guarantee an adequate level of security and confidentiality, with particular reference to the precautions indicated in Art. 32 of the GDPR and General Provision of 08/04/2010;
- the interested parties have the right to contact the Data Controller for any request for access to the video-recorded data concerning them, pursuant to art. 15 and following of the GDPR. In particular, the interested party, where he or she is identifiable, has the right to obtain from the data controller confirmation of the existence or otherwise of personal data concerning him or her, and their communication in an intelligible form; to know some information regarding their processing (origin of the data, purpose and method of processing; identification details of the data controller and, if appointed, of the data processors, etc.); to obtain the cancellation or blocking of data processed in violation of the law; as well as to oppose, for legitimate reasons, the processing itself;
- any filming of workers and use of video-recorded images takes place in compliance with current employment law regulations (Art. 4 L.300/70 "Workers' Statute", as amended by Art. 23 of Legislative Decree 151/2015 "latest implementing decree of the Jobs Act")

4) OTHER CATEGORIES OF DATA PROCESSING

Please note that the company adopts additional privacy policies for specific categories of interested parties and treatments (e.g. employee information, candidate information, etc.), normally made available to interested parties in the manner provided by law.

5) POLICY UPDATE

Please note that this information may be subject to periodic review, also in relation to the relevant legislation and jurisprudence. In the event of significant changes, appropriate evidence will be given on the home page of the site for an appropriate period of time. In any case, the interested party is invited to periodically consult this policy.