

Privacy Policy for Users

The purpose of this privacy policy is to provide all the information on the processing of personal data carried out by Softlab GBR Ltd when the User accesses and navigates this site or provides his/her data within the company's social channels

1. INTRODUCTION - WHO ARE WE?

Softlab GBR Ltd, with registered office at 20 Fitzroy Square, London, W1T 6EJ, England, UK, (hereinafter referred to as the "Data Controller"), in its capacity as the data controller of the personal data of the users who browse the website (hereinafter referred to as the "Site") and provide their data for contact purposes (hereinafter referred to as the "Users") by means of web forms reachable through the social channels (by way of example, Meta, LinkedIn, Twitter) of the Data Controller (hereinafter referred to as the "Channels"), hereby provides the following the "Users") by means of web forms accessible through the social channels (by way of example only, Meta, LinkedIn, Twitter) of the owner (hereinafter, the "Channels"), hereby provides the privacy policy statement pursuant to Art. 13 of the EU Regulation 2016/679 of 27 April 2016 (hereinafter, the "Regulation") and Article 13 of the UK General Data Protection Regulation, as transposed into UK law under the *European Union (Withdrawal) Act 2018* and later amended by the *Data Protection, Privacy and Electronic Communications (Amendments etc.) (EU Exit) Regulations 2019* (hereinafter, the "UK GDPR" and jointly with the Regulation, the "Applicable Legislation").

The Data Controller, established outside the European Union, offering a service to persons residing in the European Union, will process the personal data of Users browsing the Site pursuant to Article 3(2)(a) of the Regulation.

2. HOW TO CONTACT US?

The Data Controller takes the right to privacy and the protection of its Users' personal data into the utmost consideration. For any information in relation to this privacy policy, Users may **contact the Controller** at any time, using the following methods:

- By sending a registered letter with return receipt to the registered office of the Holder: 20 Fitzroy Square, London, W1T 6EJ, England, UK;
- By sending an e-mail to: compliance.operations@soft.it.

The Data Controller has not identified the figure of the Data Protection Officer (DPO), since it is not subject to the designation obligation provided for in Article 37 of the Regulation.

The Data Controller, established outside the European Union, has appointed Softlab S.p.a. as its **Representative in the European Union, pursuant to** Article 27 of the Regulation, who can be contacted by e-mail at: compliance.operations@soft.it.

3. WHAT DO WE DO? - PURPOSE OF PROCESSING

By browsing the Site or the Channels, the User can consult the content available and stay up-to-date on the activities and services developed by the Owner (hereinafter the "Service"). Moreover, the User may contact the Owner for different purposes such as, by way of example and not limited to, obtaining more information on the services offered, requesting support from the Owner or asking for a meeting to be arranged. Finally, through the LinkedIn link button, the User may access the Controller's LinkedIn page and send his/her application for any open job positions, in compliance with what is stated in LinkedIn's privacy policy.

In connection with the activities that may be carried out through the Site, the Controller collects personal data relating to Users.

Users' personal data will be lawfully processed by the Controller for the following purposes:

- a. **Contractual obligations and provision of the service:** to enable navigation of the Site, use of the Service and fulfil specific requests from the User. The User's data collected by the Data Controller for the purposes of registration on the Site include all personal data whose transmission is implicit in the use of Internet communication protocols, which the computer systems and *software* procedures used to operate the Site acquire in the course of their normal operation: the IP addresses or domain names of the computers used by Users, the addresses in URI (*Uniform Resource Identifier*) notation of the resources requested, the time of the request, the method used to submit the request to the *server*, the size of the file obtained in response, the numerical code indicating the status of the response given by the *server* (successful, error, etc.) and other parameters relating to the

operating system.) and other parameters relating to the User's operating system and computer environment. This data is used for the sole purpose of obtaining anonymous statistical information on the use of the Site and to allow it to function correctly. Without prejudice to the provisions set out elsewhere in this Privacy Policy and in the *Cookie Policy*, under no circumstances will the Data Controller make Users' personal data accessible to other Users and/or third parties.

- b. **Contact and/or information request:** the User's data collected by the Controller for the purposes of any contact and/or information request on the Site or the Channels are those provided from time to time through the appropriate sections, and may include: first name, last name, e-mail address, telephone number, as well as all the User's personal information that may have been voluntarily published. The User's personal data will be used by the Data Controller for the sole purpose of ascertaining the User's identity, thus avoiding possible fraud or abuse, and to contact the User for service purposes only (e.g. responding to his/her contact request). Without prejudice to what is provided for elsewhere in this privacy policy, under no circumstances will the Data Controller make Users' personal data accessible to other Users and/or third parties.
- c. **Contact request for job collaboration proposal,** the personal data of Users are collected and processed by the Controller for the sole purpose of processing their request regarding the possibility of establishing a collaboration activity with the Controller. The User's data collected by the Controller for this purpose include all the User's data possibly and voluntarily communicated to the Controller by e-mail or when the User accesses the "Job" section on the Controller's LinkedIn page through the LinkedIn button on the Site. No other processing will be carried out by the Controller in relation to Users' personal data. Without prejudice to what is provided elsewhere in this privacy policy, under no circumstances shall the Controller make Users' personal data accessible to other Users and/or third parties.
- d. **Administrative-accounting purposes:** i.e. to carry out activities of an organisational, administrative, financial and accounting nature, such as internal organisational activities and activities functional to the fulfilment of contractual and pre-contractual obligations;
- e. **Legal obligations:** i.e. to comply with obligations laid down by law, regulation or European legislation.

The provision of personal data for the purposes of the processing indicated above is optional, except for those provided for navigation on the Site. In the latter case, failure to provide them will make it impossible for the User to navigate on the Site and use the services offered by the Controller.

4. LEGAL BASIS

Contractual obligations and provision of the Service (as described in para. 1(a)): the legal basis is Art. 6(1)(b) of the Regulation, i.e. the processing is necessary for the performance of a contract to which the User is party or for the performance of pre-contractual measures taken at the User's request.

Request for contact and/or information (as described in para. 1(b)): the legal basis is Art. 6(1)(b) of the Regulation, i.e. the processing is necessary for the performance of a contract to which the User is party or for the performance of pre-contractual measures taken at the User's request.

Contact request for proposal for work collaboration (as described in para. 3(c) above): the legal basis is Art. 6(1)(b) of the Regulation, i.e. the processing is necessary for the performance of a contract to which the User is party or for the performance of pre-contractual measures taken at the User's request

Administrative-accounting purposes (as described in para. 1(d) above): the legal basis is Art. 6(1)(b) of the Regulation, as the processing is necessary for the performance of a contract and/or the execution of pre-contractual measures taken at the User's request.

Legal obligations (as described in para. 1(e) above): the legal basis is Art. 6(1)(c) of the Regulation, as the processing is necessary to comply with a legal obligation to which the Data Controller is subject.

5. PROCESSING METHODS AND DATA RETENTION PERIODS

The Data Controller will process the Users' personal data by means of manual and computerised tools, with logics strictly related to the purposes themselves and, in any case, in such a way as to guarantee the security and confidentiality of the data.

Users' personal data will be kept for the time strictly necessary to fulfil the primary purposes set out in this Policy, or in any case for the time necessary to protect the interests of both the Users and the Data Controller in civil proceedings.

6. SCOPE OF COMMUNICATION AND DISSEMINATION OF DATA

The personal data of Users, resident in the European Union, may be transferred outside the European Union and, in this case, the Data Controller will ensure that the transfer takes place in compliance with the Applicable Legislation and, in particular, in accordance with Articles 45 (Transfer on the basis of an adequacy decision) and 46 (Transfer subject to adequate safeguards) of the Regulation. In particular, with reference to the data processing carried out by the Controller, operating outside the Union, it is specified that this involves a transfer made on the basis of an adequacy decision, on the basis of the "Commission Implementing Regulation (EU) 2021/1772 of 28 June 2021 pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council on the adequate protection of personal data by the United Kingdom".

Personal data of Users, resident in the UK, may be transferred outside the UK and, if so, the Data Controller will ensure that the transfer is made in accordance with Applicable Law and, in particular, in accordance with sections 45 (Transfer on the basis of an adequacy decision) and 46 (Transfer subject to adequate safeguards) of the UK GDPR, and sections 17A, 17B, 17C and 119A of the *Data Protection Act 2018*, as amended by the *Data Protection, Privacy and Electronic Communications (Amendments etc.) (EU Exit) Regulations 2019*.

The personal data of Users may be disclosed to employees and/or collaborators of the Data Controller. These subjects, who have been instructed to this effect by the Data Controller pursuant to Article 29 of the Regulations, will process the User's data exclusively for the purposes indicated in this information notice and in compliance with the provisions of the Applicable Regulations.

Users' personal data may also be disclosed to (i) third parties who may process personal data on behalf of the Data Controller in their capacity as "**Data Processors**", such as, by way of example, providers of IT and logistical services functional to the operation of the Initiative, providers of *outsourcing* or *cloud computing* services, professionals and consultants, as well as, in the event of contact through the Channels, (ii) the managers of the Channels, in their capacity as autonomous data controllers.

Users have the right to obtain a list of any data processors appointed by the Data Controller, by making a request to the Data Controller in the manner indicated in the following paragraph 'Rights of Data Subjects'.

7. Rights of the Interested Parties

Users may exercise the rights guaranteed to them by the Applicable Legislation by contacting the Controller in the following ways:

- By sending a registered letter with return receipt to the registered office of the Holder: 20 Fitzroy Square, London, W1T 6EJ, England, UK;
- By sending an e-mail to: compliance.operations@soft.it;

The Data Controller has not identified the figure of the Data Protection Officer (DPO), since it is not subject to the designation obligation provided for in Article 37 of the Regulation.

The Data Controller, established outside the European Union, has appointed Softlab S.p.A. as its **Representative in the European Union, pursuant to** Article 27 of the Regulation, who can be contacted by e-mail at: compliance.operations@soft.it.

Pursuant to the Applicable Legislation, the Data Controller informs Users that they have the right to obtain information on (i) the origin of personal data; (ii) the purposes and methods of processing; (iii) the logic applied in the event of processing carried out with the aid of electronic instruments; (iv) the identification details of the data controller and data processors; (v) the subjects or categories of subjects to whom personal data may be communicated or who may become aware of them in their capacity as data processors or persons in charge of processing.

In addition, Users have the right to obtain:

- (a) **access, update, rectification** or, where interested, **integration of** the data;
- b) the **deletion, transformation into anonymous form or blocking** of data processed in breach of the law, including data whose storage is not necessary in relation to the purposes for which the data were collected or subsequently processed;
- c) certification that the operations referred to in points a) and b) have been brought to the attention, also as regards their content, of those to whom the data have been communicated or disseminated, unless this proves impossible or involves a manifestly disproportionate effort compared with the right protected.

In addition, Users have:

- (a) the right to **withdraw consent** at any time, if the processing is based on their consent;

(b) where possible, the right to **data portability** (the right to receive all personal data concerning them in a structured, commonly used and machine-readable format), the right to **restriction of the processing of** personal data and the **right to erasure** ('right to be forgotten');

(c) the **right to object**:

(i) in whole or in part, for legitimate reasons, to the processing of personal data concerning them, even if they are relevant to the purpose of the collection;

ii) in whole or in part, to the processing of personal data concerning them for the purpose of sending advertising or direct sales material or for carrying out market research or commercial communication;

(iii) where personal data are processed for direct marketing purposes, at any time, to the processing of their data carried out for that purpose, including profiling insofar as it is related to such direct marketing.

d) if they consider that the processing concerning them is in breach of the Regulation, the right to lodge a **complaint with a Supervisory Authority** (in the Member State in which they habitually reside, in the Member State in which they work or in the Member State in which the alleged breach occurred). The Italian Supervisory Authority is the **Garante per la protezione dei dati personali**, based in Piazza di Monte Citorio n. 121, 00186 - Rome (<http://www.garanteprivacy.it/>). The UK Data Protection Supervisory Authority is **the Information Commissioner's Office** (ICO), based at Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, United Kingdom (<https://ico.org.uk/>).

The Owner is not responsible for updating all the links displayed in this Policy, therefore whenever a link is not working and/or updated, Users acknowledge and accept that they must always refer to the document and/or section of the websites referred to by that link.