

## DATA PROTECTION POLICY

Pursuant to Art. 13 of EU Regulation 679/2016, as amended and supplemented (“GDPR”), as well as Italian and EU laws that complement it (“Applicable Privacy Law”), as amended and supplemented, we would like to share the information below as it pertains to your personal data (“Data”).

### 1 - DATA CONTROLLER

The Data Controller is e-GEOS S.p.A., with registered office in Matera, Loc. Terlecchie, snc, in the person of its pro tempore legal representative ([titolare.data.protection@e-geos.it](mailto:titolare.data.protection@e-geos.it)).

### 2 - PURPOSE OF DATA PROCESSING

The Data processing:

- (a) allows the Data Controller to carry out those activities which are strictly connected and/or necessary to pursue statistical, commercial and promotional objectives, as well as to the update of all natural or legal persons personal data and the requests made from time to time, by the user, through the website <http://www.e-geos.it/> (“Requests” and “Website”, respectively) and/or by e-mail. In order to access to some Website restricted pages, you may be required to enter your personal information for registration purposes;
- (b) may also be related to activities providing commercial information, as well as to Data Controller and/or affiliates marketing services;
- (c) is related to statutory requirements set forth by the applicable national or EU legislations or regulations, as well as to instructions issued by competent authorities, supervisory and control bodies.
- (d) may concern to the activity of sending newsletters, which only takes place at the specific request of the person concerned.
- (e) may also concern profiling activities connected to the newsletter service for the personalization of the content sent on the basis of the interests expressed by individual users, through the use of external data processors or third parties that support e-GEOS in carrying out the requested services.

### 3 - DATA PROCESSING

The Data processing:

- (a) takes place according to methods and procedures strictly necessary for the fulfillment of the Requests and is carried out by means of operations or a series of operations, pursuant to Article 4, number 2 of the GDPR;
- (b) is carried out with the support of electronic or automated tools. Data are stored in paper and electronic archives located at the headquarters of the Data Controller, as well as in servers across Italy;
- (c) is performed through the use of fax, e-mail or other remote communication tools. The Data Controller also uses the same methods when sharing Data with third parties for the aforementioned purposes and objectives, as specified in point 6 below.
- (d) is carried out, for some services, through the use of external data processors or third parties that support e-GEOS in carrying out the requested services by means of their own electronic or automated tools.

Processing is also carried out using “cookies” (i.e., Website-related information that the Website sends to the user's computer during browsing in order to capture and remember information to improve the Website).

The Website makes use of the following cookies: session cookies and, in particular: [www.e-geos.it](http://www.e-geos.it/): sid, sid\_Client, \_fbp, \_ga.

### 4 - DATA PROVISION AND LEGAL BASIS FOR PROCESSING

Notwithstanding the data subject's consent, the provision of personal data can be:

- (a) mandatory, pursuant to a Law or Regulation, with reference to the purposes referred to in paragraph 2, letters (a) and (c), above;

(b) specific optional, with reference to the purposes specified in paragraph 2, letters (b) and (e), above. In this case, processing is carried out with the consent of the data subject, requested through pages of the site.

With reference to the purposes referred to in paragraph 2 letter (d) above, it should be noted that the legal basis is not the consent of the data subject, but the performance of a contract and/or the request for services at the request of the data subject, in line with Article 6 paragraph 1 letter (b) of the GDPR.

## **5 - REFUSAL TO DATA PROVISION**

When the data subject refuse to provide Data or, where requested, to provide the necessary consent for processing:

- (a) in cases foreseen in paragraph 2, letters (a) and (c), the Data Controller may not be able to fulfill a request for a commercial order or service;
- (b) in case foreseen in paragraph 2, letters (b), (d) and (e) the Data Controller may not be able to carry out the commercial and marketing activities concerning the services provided by the Data Controller and by the other affiliates.

## **6 - DATA COMMUNICATION**

- (a) Data may be disclosed - for the purposes foreseen in paragraph 2, letters (a) and (c) or pursuant to specific legal obligations - to other parties and, in particular, to consultants who assist the Data Controller for the fulfillment of the Requests (for example, legal and tax studies);
- (b) Data may be disclosed to affiliates for the purposes referred to in point 2, lett. (b).
- (c) Data may be disclosed to newsletter service providers for the purposes set out in paragraph 2 letters (d) and (e) above.
- (d) finally, Data may be disclosed, subject to express consent, to newsletter service providers for the purpose referred to in paragraph 2 letter (e) above.

## **7 - DATA DISCLOSURE**

Data may be disclosed to third parties who perform specific tasks on behalf of e-GEOS, for administrative matters (e.g., management of information systems, market research, delivery of correspondence, certification of financial statements, ICT), as well as to banks for the management of receipts and payments, to leasing, insurance and debt collection companies, professional firms (legal and commercial) - and external bodies for statistical or market research purposes. Data may also be disclosed to companies belonging to the Leonardo S.p.A./Telespazio S.p.A. group, or to subsidiaries or affiliates, pursuant to Art. 2359 of the Civil Code (operating in Italy and abroad), which may proceed to processing operations for the pursuit of the same purposes for which data were collected, without needing the data subject consent.

## **8 - DATA RETENTION**

Data shall be stored for the period of time strictly necessary to pursue the specific purposes of the processing for which consent has been given and, specifically:

- (a) for the purposes indicated in paragraph 2 letters (a) and (c) for the time necessary for the fulfilment of legal obligations and, in any case, no longer than 10 years from the moment of the collection of the Data for the fulfilment of regulatory obligations and, in any case, no longer than the terms established by law for the prescription of rights;
- (b) for the purposes set out in paragraph 2 letters (b), (d) and (e) (i.e., for the purpose of conducting surveys on customer satisfaction and the quality of the services offered) for 24 months from the time consent to the processing is given or the service request is made.

## **9 - DATA TRANSFER TO THIRD COUNTRIES**

The data may be transferred to non-EU countries for the purposes and purposes referred to in paragraph 6 letters (c) and (d), following the signing of a specific agreement pursuant to Article 28 of the GDPR, containing the guarantees provided for by current legislation for the transfer of data outside the EU.

## 10 - DATA SUBJECT RIGHTS

With regard to personal data in our possession, the data subject can exercise the rights foreseen by the Applicable Privacy Law. In particular, you may:

- a) ask the Data Controller to confirm: existence of your personal data, origin of such data, logic and purpose of processing, categories of subjects to whom data may be disclosed, as well as identification details of Data Controller and Data Processors;
- b) have the right to request access to personal data, as well as the data transformation into anonymous form, to exercise the right of objection, rectification, or eventually to erase and to have incomplete personal data completed or to obtain the restriction of processing;
- c) oppose to the processing, in cases foreseen by the Applicable Privacy Law;
- d) exercise the right to portability, within the limits established by Art. 20 of the GDPR;
- e) revoke consent (if this is the legal basis necessary for processing) at any time without prejudice to the lawfulness of processing based on the consent given prior to revocation;
- f) have the right to lodge a complaint with the European Data Protection Supervisor, following the procedures and the instructions published on the official website of the Supervisory Authority: [www.garanteprivacy.it](http://www.garanteprivacy.it).

Any amendment to, deletion of and limitation on processing carried out upon your request - unless this proves impossible or involves a disproportionate effort - will be notified by the Data Controller to each of the data subjects of whom personal data have been disclosed. Upon request of the data subject, the Data Controller may share the identity of the recipients.

In order to exercise the rights as referred to in paragraph 9.1 above, as well as for any communication, request or notification regarding privacy data, you may send an email to e-GEOS Data Protection Officer, at the following address:

data.protection.officer@e-geos.it or [e-geos.dpo@pec.it](mailto:e-geos.dpo@pec.it)

In order to be aware of changes or amendments to the privacy policies applied by e-GEOS S.p.A., due primarily to regulatory changes, we recommend that you constantly review this document.