

PRIVACY POLICY
on the processing of personal data
FOR ADVANCED ELECTRONIC SIGNATURE - SIGNBOOK
Articles 12 and following of Regulation (EU) 2016/679 (GDPR)

Subject: *Information on the processing of personal data pursuant to Articles 12 and following of Regulation (EU) 2016/679 for Advanced Electronic Signature*

Data Controller - The data controller is the undersigned: HWG Sababa S.r.l., with registered office in Piazza Tre Torri 2, 20145 Milano (MI); Tel: +39 045 4932800; registered mail: posta@pec.hwgsrl.it; e-mail: compliance@hwgsababa.com.

Data Protection Officer - Data Protection Officer is Mr. Christian Bernieri: e-mail: dpo@6ft.it.

Preamble - This is to inform you, in compliance with the aforementioned regulation, that in relation to the issuance of the Advanced Electronic Signature, the Data Controller possesses certain data related to you, which have been acquired for the purpose of providing the aforementioned service. In compliance with this premise, the following information is provided:

Personal data collected - The undersigned, as Data Controller, uses your personal data to operate effectively in the exercise of its activities. The following data may be requested from you:

- Personal and contact information;
- Non-biometric personal data via the Advanced Electronic Signature accession form;
- Data related to images recorded during the signatory subject's identification interview;
- Tax code and identity card.

Retention period of your data - The collected data will be retained for the entire duration of the relationship or collaboration, in particular, practices related to recognition are retained for 20 years, and signed documents for 10 years. If data not related to administrative-accounting obligations connected to the contractual relationship are processed, such data will be retained for the time necessary to achieve the purpose for which they were collected and then deleted. The retention periods of such data will be communicated to you when such data are collected with specific information.

Mandatory or optional nature of data provision and consequences of any refusal - The essential data for the activation of the Advanced Electronic Signature, as identified above, must be provided to the undersigned; as well as the data necessary to comply with obligations provided for by laws, regulations, community regulations, or by provisions of Authorities authorized by law and by supervisory and control bodies.

Processing methods - Pursuant to Articles 12 and following of the GDPR, we wish to inform you that the personal data communicated to us will be processed in compliance with the appropriate technical and organizational measures pursuant to Article 32 of the GDPR.

Transfer of personal data abroad - The data provided by you will only be processed in Italy. If, during the contractual relationship, your data are processed in a non-EU state, the rights attributed to you by European legislation will be guaranteed, and you will be promptly informed.

Purpose of the processing to which personal data are intended - The purpose of processing your personal data that the undersigned intends to carry out is to enable the issuance of the Advanced Electronic Signature.



Scope of knowledge of your data - The following categories of subjects appointed as data processors or authorized by the undersigned may become aware of your data: personnel responsible for recognition; consultants, whose involvement is necessary to carry out operations related to the use of our services and/or to comply with legal obligations.

Data Processors - Companies external to us with which a contractual relationship has been established and which need to receive your personal data to fulfill such agreements assume the role of Data Processors. It should be noted that the aforementioned Data Processor does not handle requests for the exercise of the rights of data subjects pursuant to Articles 15 and following of the GDPR. This activity is exclusively carried out by the undersigned as Data Controller.

Rights under Articles 15 and following of the GDPR - Pursuant to Article 15 of the GDPR, you have the right to obtain confirmation of whether or not personal data concerning you is being processed, even if not yet recorded. The exercise of these rights is subject to the verification of the identity of the data subject, by providing an identity document, which will not be retained by the undersigned but only consulted for the purpose of verifying the legitimacy of the request.

You have the right to access personal data and the following information:

- a) the purposes of the processing;
- b) the categories of personal data being processed;
- c) the recipients or categories of recipients to whom the personal data have been or will be disclosed, particularly recipients in third countries or international organizations;
- 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) if the data are not collected from the data subject, all available information as to their source;
- f) the existence of automated decision-making, including profiling, referred to in Article 22, paragraphs 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.

If the data are transferred to a third country or to an international organization, you have the right to be informed of the existence of adequate safeguards pursuant to Article 46 of the GDPR. You have the right to request the data controller to rectify or erase, in whole or in part, personal data concerning you or to restrict the processing of your personal data, or to object to their processing, in whole or in part. Pursuant to Article 2-undecies of Legislative Decree no. 196/2003, the exercise of your rights may be delayed, limited, or excluded, with a motivated communication made promptly, unless the communication may compromise the purpose of the limitation, for the time and to the extent that this constitutes a necessary and proportionate measure, taking into account fundamental rights and legitimate interests of the data subject, in order to safeguard the interests referred to in paragraph 1, letters a) (interests protected in the field of money laundering), e) (in carrying out defensive investigations or exercising a right in court) and f) (in preserving the confidentiality of the identity of the employee who reports offenses of which they become aware in the course of their duties). In such cases, your rights can also be exercised through the Guarantor in the manner provided for in Article 160 of the same Decree. In this case, the Guarantor will inform you that all necessary checks have been carried out or that a review has been conducted, as well as of your right to bring legal action.

To exercise these rights, you can contact our "Data Controller" at the email address compliance@hwgsababa.com. The Data Controller will respond to you within 30 days of receiving your formal request. We remind you that in case of violation of your personal data, you can lodge a complaint with the competent authority: the "Garante per la protezione dei dati personali".

THE DATA CONTROLLER

HWG Sababa S.r.l. with sole shareholder
VAT 03820790230

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