# **Privacy Policy**

Art. 13 - GDPR (UE/2016/679)

Dear user, pursuant to Article 13 of EU Regulation 679/2016 on the protection of personal data (GDPR), we inform you that the data you provide, through this site, may be processed in compliance with the following.

### **HOLDER OF THE DATA TREATMENT**

The Data Controller is Dogma Spa, VAT number 10425470019, with registered office and administrative offices in Turin (TO) - 10121, Corso Vittorio Emanuele II 92, which can be contacted at the email address info@dogma.it or at the telephone number +39 011 5617504.

### **DATA PROTECTION MANAGER (DPM)**

The Data Controller has appointed Gobbi & Partners Law Office, VAT number 01596100097 as Data Protection Officer, with registered office in Corso Italia 5/10 - 17100 Savona, Telephone: +39 019 8338257 The contact person is the lawyer Roberto Gobbi who can be contacted at the following email address: avvocatorobertogobbi@libero.it

### **POLICY**

Through this website, the personal data that you will eventually enter within the various areas listed below will be acquired.

### 1. Mail Area

The data you send via email will be treated in this way.

PURPOSE	to process your requests.
LEGAL BASIS	- art. 6 paragraph 1 letter f) of the GDPR legitimate interest: the optional, explicit and voluntary sending of personal data to the email address on the site involves the acquisition of the sender's contact data, necessary to respond, as well as all personal data included in communications.
DATA RETENTION TIMES	The data provided will be kept for the time necessary to satisfy your request.
COMMUNICATION OF DATA TO SUBJECTS OTHER THAN THE OWNER	- in charge of processing under the authority of the data controller; - data processors designated by the data controller.

### 2. Contact Form Area

The data you send through the form will be treated in this way

PURPOSE	- to process your requests;
	- to arrange an interview.
LEGAL BASIS	art. 6 paragraph 1 letter f) of the GDPR legitimate
	interest: the optional, explicit and voluntary sending of
	personal data through the form on the site involves
	the acquisition of the sender's contact data,
	necessary to respond, as well as all personal data
	included in communications.

DATA RETENTION TIMES	The data provided will be kept for the time necessary to satisfy your request.
COMMUNICATION OF DATA TO SUBJECTS OTHER THAN THE OWNER	- in charge of processing under the authority of the data controller;
	- data processors designated by the data controller.

## 3. Chat\_Area: can I help you?

The data you send via chat will be treated in this way

PURPOSE	to process your requests.
LEGAL BASIS	<ul> <li>art. 6 paragraph 1 letter f) of the GDPR legitimate interest: the optional, explicit and voluntary sending of personal data to the chat on the site involves the acquisition of the sender's contact data, necessary to respond, as well as all the personal data included in the communications.</li> </ul>
DATA RETENTION TIMES	The data provided will be kept for the time necessary to complete your request and in any case not later than 15 days.
COMMUNICATION OF DATA TO SUBJECTS OTHER THAN THE OWNER	<ul><li>in charge of processing under the authority of the data controller;</li><li>data processors designated by the data controller.</li></ul>

### 4. Work with us\_Area

The data you send through the form will be treated in this way

PURPOSE	<ul> <li>evaluation of the Candidate for the purpose of his employment in an employment relationship or assimilated to the employee;</li> <li>conservation for a possible future employment even if not in an employment relationship (e.g. project contracts, etc);</li> <li>verification of the accuracy of the data you provide, including through the use of external companies.</li> </ul>
LEGAL BASIS	<ul> <li>-art. 6, paragraph 1, letter a) of the GDPR): the interested party has given his consent;</li> <li>-art. 6 paragraph 1 letter f) of the GDPR legitimate interest: selection and hiring of personnel. Art. 111-bis of the Legislative Decree 30 June 2003, n. 196.</li> </ul>
DATA RETENTION TIMES	The data provided will be kept for the time necessary to evaluate the candidacy and manage the personnel selection process.
COMMUNICATION OF DATA TO SUBJECTS OTHER THAN THE OWNER	in charge of processing under the authority of the data controller;     data processors designated by the data controller.

## 5. Newsletter\_Area

The data you entered for the newsletter (within the Contact Form) will be processed in this way

PURPOSE	Provide newslette	you ers.	with	information	communications	via
LEGAL BASIS			•	,	f the GDPR legitir nd voluntary sendir	

	personal data in order to receive Newletters from Dogma S.p.a.
DATA RETENTION TIMES	The data provided will be kept until your request to deactivate the service.
COMMUNICATION OF DATA TO SUBJECTS OTHER THAN THE OWNER	<ul> <li>in charge of processing under the authority of the data controller;</li> <li>data processors designated by the data controller.</li> </ul>

## 6. Activate online Investigation\_Area

The data you enter in the area assigned for the online agreement will be treated in the following

PURPOSE  LEGAL BASIS	- for activities related to the performance of the requested service and for the subsequent management of the relationship deriving from it; for tax accounting obligations and for obligations deriving from Community and National Laws, Rules and Regulations; for information related to the relationship; - to sign the online agreement; - for the video identification service; - for advanced electronic signature (FEA); - for administrative and accounting purposes related to service and conservation contracts, relating to video identification and electronic signature.  -art. 6, paragraph 1, letter b) of the GDPR: processing is necessary for the execution of a contract of which
	the interested party is a party; -art. 6, paragraph 1, letter c) of the GDPR: processing is necessary to fulfill a legal obligation to which the data controller is subject.
DATA RETENTION TIMES	<ul> <li>the data relating to the survey commissioned by the principal will be kept for the period strictly necessary for the fulfillment of the agreement.</li> <li>the data relating to the fulfillment of tax and administrative obligations, or for purposes of compliance with contractual obligations, will be kept for the period provided for by current legislation.</li> <li>the videos, photos and data of the video identification completed successfully and the signed agreement will be kept for 20 years as required by DPCM 22/02/2013 art. 57 letter b);</li> <li>unsuccessful videos, photos and video identification data will be deleted from the platform within 3 months of the completion of the identification process;</li> <li>the metadata of the discarded sessions will remain on the platform, anonymously, for statistical purposes.</li> </ul>
COMMUNICATION OF DATA TO SUBJECTS OTHER THAN THE OWNER	<ul> <li>in charge of processing under the authority of the data controller;</li> <li>data processors designated by the data controller;</li> <li>other authorized private investigators within the limits strictly necessary for the fulfillment of the agreement and support in carrying out the investigations;</li> <li>suppliers in relation to contractual and / or legal obligations;</li> <li>subjects who can access the data pursuant to the provisions of the law, regulation or community legislation, within the limits set by these rules;</li> <li>banks, credit institutions, data processing companies</li> </ul>

and credit card issuing companies, for activities strictly
related to the execution of the contract;
- entities, consortia, professionals and companies for the
purpose of credit recovery and protection; credit
insurance company, commercial information company;
- other subjects for tax, accounting, insurance and
financial services obligations.

Any designated Data Processors will be bound to confidentiality and data security through a contract and the updated list of Data Processors can always be requested from the Data Controller.

#### **RIGHTS OF THE INTERESTED PARTY**

To assert your rights, as provided for in article 15 of the GDPR and following, you can contact the Data Controller or Data Protection Officer, who can be contacted through the contact details indicated above, identifying and specifying the nature of the request or problem highlighted.

You can exercise the following rights on your data:

- -Access
- -Correction
- -Cancellation
- -Limitation
- -Opposition to the treatment

For the treatments subject to consent, the interested party has the right to withdraw his consent at any time. The withdrawal of consent does not affect the lawfulness of the processing before the withdrawal itself.

The exercise of certain rights mentioned, could limit the "Dogma S.p.a." in the processing of the requested data that are essential for the management of the contractual relationship, with the consequent impossibility of providing the service.

#### NATURE OF THE COMMUNICATION OF YOUR PERSONAL DATA

The communication of your personal data in the area used to sign the online agreement is a necessary requirement for the conclusion of a contract.

#### TRANSFER OF DATA TO THIRD COUNTRIES

The data will be processed exclusively within the European Union.

### **RIGHT TO COMPLAINTS**

If you believe that the processing of the data provided violates the legislation on the protection of personal data, you have the right to lodge a complaint with the supervisory authority Guarantor of Privacy, based in Piazza Venezia 11 - 00186 Rome - Tel. 06.696771 - Mail: <a href="mailto:garante@gpdp.it">garante@gpdp.it</a>

### **AUTOMATED DECISION-MAKING PROCESSES**

The use of an automated decision-making process, nor of profiling pursuant to art. 22, par. 1-4 of the GDPR.