Privacy Notice — provision of the PrivacyGate Service

Notice on the processing of personal data · artt. 13 and 14 Regulation (EU) 2016/679

ADDRESSED TO	Referenti amministrativi e account dello staff dei clienti del Servizio PrivacyGate
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1 Preamble

Privacy Notice on the processing of personal data (artt. 13-14 GDPR)

Pursuant to artt. 13 and 14 of Regulation (EU) 2016/679 (GDPR), Innhova di R.M. hereby informs you on how it processes your personal data regarding: «Provision of PrivacyGate».

This notice is addressed to the following categories of data subjects: Administrative contacts and staff accounts of the customers of the PrivacyGate Service.

2 Data Controller

The Data Controller is Innhova di R.M., located at Via Padule 54, 07024 La Maddalena (SS) (form: https://innhova.privacygate.it/new-request.html).

3 Purposes of processing and legal basis

Processing «Provision of PrivacyGate»:

- Providing the Service and performing the contract with the customer: creating and managing staff accounts, administering the dedicated instance — legal basis: performance of a contract (art. 6.1.b GDPR)
- Tax, accounting and administrative obligations related to the provision of the Service — legal basis: compliance with a legal obligation (art. 6.1.c GDPR)
- Security of information systems and prevention of unauthorised access — legal basis: legitimate interest (art. 6.1.f GDPR)

4 Legitimate interests pursued

For purposes based on legitimate interest, the Controller has assessed the balance between its own interest and your rights and freedoms; you can request information about the assessment at the contacts indicated.

5 Categories of personal data

The following categories of personal data are processed:

- Contact details
- Other (Billing data — personal and tax details)
- Other (Navigation data and technical logs of the Service)

6 Recipients of data

Data may be communicated to: —. Data is not subject to dissemination.

7 Retention period

Data is retained for the time necessary for the indicated purposes:

- Contact details: For the entire duration of the contractual relationship and subsequently for the ordinary limitation period and for tax obligations (10 years)
- Billing data (personal and tax details): 10 years from the end of the relationship (tax obligations)
- Navigation data and technical logs of the Service: 26 months

8 Your rights and how to exercise them

You can exercise your rights at any time, without formality, in the ways indicated below.

- Access (art. 15): obtain confirmation as to whether or not personal data concerning you is being processed and a copy of your data, along with information on the processing.
- Rectification (art. 16): correct inaccurate data or complete incomplete data.
- Erasure (art. 17): obtain the erasure of data in the cases provided for.
- Restriction (art. 18): obtain restriction of processing in the cases provided for.
- Data portability (art. 20): receive your data in a structured, commonly used and machine-readable format and transmit it to another controller.
- Right to object (art. 21): object at any time, on grounds relating to your particular situation, to processing based on legitimate interest; object at any time to direct marketing.
- Withdrawal of consent (art. 7.3): withdraw consent at any time, without affecting the lawfulness of processing based on consent prior to its withdrawal.
- Automated decision-making (art. 22): not be subject to a decision based solely on automated processing, including profiling, which produces legal or similarly significant effects.

You can exercise your rights by filling out the online form: https://innhova.privacygate.it/new-request.html. You will then be able to track the status of your request and communicate with us through the dedicated portal: https://innhova.privacygate.it/portal.html.

We respond within 30 days of receipt, extendable by 60 days in complex cases.

To protect your data, we may request additional information to verify your identity before proceeding with your request (art. 12.6 GDPR). Exercising your rights is free of charge; in the event of manifestly unfounded or excessive requests, we may charge a reasonable fee or refuse the request (art. 12.5 GDPR).

9 Right to lodge a complaint

You have the right to lodge a complaint with the supervisory authority (in Italy, the Garante per la protezione dei dati personali) if you consider that the processing violates Regulation (EU) 2016/679 (art. 77 GDPR). (Garante per la protezione dei dati personali — https://www.garanteprivacy.it)

10 Provision of data

Providing data is necessary for the specified purposes; refusal to provide data may make it impossible to respond to your request or provide the service.

11 Cookies and tracking

The list of cookies and tracking tools actually used on the site, with their purposes, is available in the published cookie register and in the consent banner. You can review or change your preferences at any time from the «Manage cookies» link in the site footer.

12 Automated decision-making processes

There is no automated decision-making process, including profiling, as referred to in art. 22 GDPR.