

## PRIVACY POLICY

Sodai S.p.A. firmly believes that transparency should form the basis of its relationship with customers and users. Consequently, it intends to apply the utmost clarity on how personal data is used

The methods for managing the website are described below, with reference to the processing of the personal data of the users who consult it.

This is a policy that is also made available, pursuant to article 13 of Regulation (EU) 2017/679 “Protection of natural persons with regard to the processing of personal data and on the free movement of such data” (hereinafter GDPR), to users who interact with the web services of Sodai S.p.A., accessible via the internet at the address <https://sodai.com/>.

The policy is also based on Recommendation no. 2/2001 that the European Authorities for the protection of personal data, grouped by art. 29 of Directive no. 95/46/EC, adopted on May 17, 2001, to identify some minimum requirements for the collection of personal data on-line, and, in particular, the methods, timing and nature of the information that the Data Controllers must provide to users when they connect to web pages, regardless of the purpose of the connection.

### **1. Controller and processor of personal data**

The data controller is Sodai S.p.A., with registered offices in Milan, Via R. Montecuccoli,32. An internal manager has been appointed for the processing of personal data and external managers have been appointed to whom the data are communicated for the various processing purposes.

The complete list of data processors can be requested at the address: [privacy@sodai.com](mailto:privacy@sodai.com).

### **2. Location of personal data processing**

The processing related to the web services of this website take place at the headquarters of the company and is only handled by the technical staff of the office in charge of the processing.

### **3. Type of data processed**

#### Browsing data

The computing systems and software procedures employed to operate this website acquire, during the normal course of operation, some personal data whose transmission is implicit in the use of Internet communication protocols.

This is information that is not collected for association with specific individuals, but by its very nature could, through the processing and association with data held by third parties, allow users to be identified.

This category of data includes IP addresses or domain names of computers used by users who connect to the website, URI addresses (Uniform Resource Identifier) of requested resources, the time of the request, the method employed to submit the request to the server, the size of the file obtained in reply, the numerical code indicating the status of the response from the server (successful, error, etc.) and other parameters related to the user's operating system and IT environment.

These data are only used to obtain anonymous statistical information about website use and to check that it is working correctly and are deleted immediately after processing. The data may be used to ascertain responsibility in the event of hypothetical computer crimes against the website.

#### Data submitted by the user

The optional, explicit and voluntary sending of emails to the addresses indicated on this website entails the subsequent acquisition of the sender's address, required to respond to requests, as well as any other personal data included in the message.

The issue of personal data is required for some specific services; detailed policies are indicated in the website pages provided for specific services on request.

#### **4. Purposes and legal basis for the data processing**

Without prejudice to the specifications for the browsing data referred to in point 2.1), the personal data provided by users through the website are processed for the following purposes:

- a) to allow the execution of operations strictly connected and related to the management of relationships with users, such as the response to questions received with the contact form, the management of CVs (curriculum vitae) for recruitment purposes and other relevant information submitted by the user;
- b) to allow the fulfilment of the obligations laid down by laws, regulations and community legislation, or provisions issued by authorities empowered by the law and by supervisory and control bodies;
- c) purposes necessary to ascertain, exercise or defend a right in court or whenever the judicial authorities exercise their judicial functions;
- d) purposes of statistical research/analysis on aggregated or anonymous data, therefore, without the possibility of identifying the user, aimed at measuring the operation of the website and its operational functions, including the resolution of any technical problems.

The legal basis for the processing of personal data for the purposes referred to in point a) is the delivery of a service or the response to a request, which do not require the consent of the users, in accordance with the applicable legislation.

With regard to the purposes b) and c), the processing is necessary to pursue a legitimate interest of the company, while the purpose referred to in point d) does not involve the processing of personal data.

#### **5. Consent to data processing**

Unless otherwise specified for browsing data, the user is at liberty to provide his/her personal data.

#### **6. Processing method and storage time**

The personal data are processed by automated instruments for the time strictly required to execute the purposes for which they were collected.

Specific security measures are observed to prevent the loss of the data, unlawful or incorrect use and unauthorised access.

#### **7. Data subjects' rights**

The subjects to whom the personal data refer have the right, at any time, to obtain confirmation of the existence of said data and to know their content and origin, verify their accuracy or request their integration or updating, or rectification (Article 15 et seq. GDPR).

Pursuant to the same article, the data subject has the right to request erasure, transformation into anonymous form or blocking of data processed in violation of the law, as well as to object in any case, for legitimate reasons, to their processing.

All requests should be sent via email to the address: [privacy@sodai.com](mailto:privacy@sodai.com)

#### **8. Modifications**

The company reserves the right to modify the privacy policy at any time, due also to changes in the applicable legislation, by updating this page. The user is, therefore, required to periodically check the privacy policy to see if there have been any updates.

This information, Rev.00, was issued on 01.02.2020 and became effective from 01.02.2020.