

ACADEMY.COLOMBINIGROUP.COM WEB SITE PRIVACY POLICY

PREMISE

What is this document? This document contains information on the processing of personal data relating to the e-learning platform.

Who is this document for? The information is intended for all visitors who interact on the e-learning platform

Why this document? Law 171/2018 and EU Regulation 2016/679 require that you - the interested party - be informed about your personal data that is processed and who will process it, in order to guarantee that the processing is correct and transparent.

"Colombini Group e-Academy" is a Cloud/SaaS e-learning platform developed by Docebo S.p.a.

You will therefore see clearly listed below: **who** will process your data, **which** personal data will be processed, **the purposes** for which the personal data will be processed, **how long** the data will be processed for, what **your rights** are.

What laws does this document refer to? The information is provided taking into account the combined provisions of:

- Law 171/2018 on the Protection of individuals with regards to the processing of personal data (hereinafter the "Law")
- Law 70/1995 which regulates the computerized collection of personal data
- European Regulation for the Protection of Personal Data (GDPR) EU 2016/679 (hereinafter "Regulation")
- Legislative Decree 196/2003 (Privacy Code), as amended by Legislative Decree 101/2018
- European Directive 2002/58 / EC so-called "e-Privacy"

PRIVACY POLICY

1) DATA PROCESSOR

The following companies have signed an internal joint ownership agreement, as required by art. 28 of the Law and by art. 26 of the Regulation, determining the respective responsibilities regarding the observance of the obligations deriving from the laws in force, with particular regards to the exercise of the rights of the interested party. At the request of the interested party, the essential content of the joint ownership agreement will be made available. Joint data processing controllers are the following companies:

- Colombini Group S.p.a. with registered office in strada Cà Valentino, 124 - 47891 Falciano (RSM)
- Colombini S.p.a. with registered office in strada Cà Valentino, 124 - 47891 Falciano (RSM)
- Rossana S.r.l. with registered office in strada Cà Valentino, 124 - 47891 Falciano (RSM)
- Uniretail S.r.l. with registered office in via Ausa 191 - 47853 Coriano (ITA)

Single contact point between the joint controllers and the interested party: privacy@colombinigroup.com - Colombini Group S.p.a. Strada Cà Valentino, 124 - 47891 Falciano (RSM) - Tel. (+378) 0549 975611

Data Protection Officer (DPO): PRIVACY365 S.r.l., via Alfonso Giangi 11 - 47891 Dogana (RSM), email dpo@colombinigroup.com - Tel. (+378) 0549 964586

Representative of the European Union of the San Marino data controllers: PRIVACY365 Italia S.r.l. viale Berna 9 / B - 47924 Rimini (RN) - art27gdpr@privacy365.eu - PEC: privacy365italia@pec.it - Tel. (+39) 0541 1647198.

2) PURPOSE, LEGAL BASIS, NATURE OF PROCESSING AND RETENTION PERIOD

Your personal data is processed for the following purposes:

a. Provision of training services by the Data Controller (e-learning platform, participation in webinars, etc.)

- the legal basis of this processing is the need to execute a contract in which the interested party is a part of or to carry out pre-contractual agreement measures adopted at the request of the interested party;
- the retention period of the data that is processed for this purpose is the duration of the contract and, in the case of a legal dispute, for the entire duration of the same, until the exhaustion of the terms of practicability of the appeals.
- the provision of personal data deemed essential to carry out the provision of the requested services is mandatory and any refusal will make it impossible to provide the service.

b. Responding to contact requests (e.g. requests for information, etc.):

- the legal basis of this processing is the pursuit of the legitimate interest of the Data Controller in response to the requests of the interested parties;
- the retention period of the data processed for this purpose is equal to the time necessary to process the request;
- the provision of personal data is optional, however any refusal will make it impossible to process the contact request.

c. To prevent or control illegal conduct or to protect and enforce rights:

- the legal basis of this processing is the pursuit of the legitimate interest of the Data Controller to prevent or prosecute illicit or violations of intellectual / industrial property rights (including third parties) or computer crimes or crimes committed through telematic networks;
- the retention period of the data processed for this purpose is equal to the time reasonably necessary to assert the rights of the Data Controller from the moment in which the offense or its potential commission becomes known.

3) PERSONAL DATA PROCESSING

By processing of personal data it is meant any operation or set of operations, carried out with or without the aid of automated processes and applied to personal data or sets of personal data, such as the collection, registration, organization, structuring, storage, adaptation or modification, extraction, consultation, use, communication by transmission, dissemination or any other form availability, comparison or interconnection, limitation, cancellation or destruction.

Further processing, of particular data categories by the Data Controller, will be carried out only with the prior and explicit consent.

The personal data processed, in addition to the purposes referred to in point 2), are the following:

- *Registration on the platform*

The personal data required are: username, email, name, surname, type of registry

The optional personal data requested are: id-age, customer-id, position, address and city, mobile phone, master base data

- *Browsing data*

The computer systems and software procedures used to operate this site acquire, during their normal operation, some personal data the transmission of which is implicit in the use of Internet communication protocols.

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

These data, necessary for the use of web services, are also processed for the purpose to:

- obtain statistical information on the use of services (most visited pages, number of visitors by time or day, geographical areas of origin, etc.);

- check the correct functioning of the offered services.

The navigation data shall expire withing 365 days and are deleted immediately after their aggregation (except for any need for the ascertain of crimes by the judicial authority).

- *Data communicated by the user*

The optional, explicit and voluntary sending of messages to the contact addresses of the Data Controller entails the acquisition of the sender's contact data, necessary to reply, as well as all personal data included in the communications.

- *Cookies and other tracking systems*

Please refer to the detailed information available at the following link:

<https://academy.colombinigroup.com/learn/cookie-policy-private>

4) RECIPIENTS OF PERSONAL DATA

Your personal data may be shared, for the aforementioned purposes, with:

- subjects who typically act as "Data Controllers", pursuant to Article 29 of the Law and art. 28 of the Regulation, i.e. people, companies or professionals who provide assistance and advice to the Data Controller in subjects of accounting, administrative, legal, tax, financial and credit recovery matters, etc., in relation to the provision of services/products;

- subjects with whom it is necessary to interact with for the provision of services/products (eg personal sales network);

- subjects, bodies or authorities to whom it is mandatory to communicate your personal data in accordance with the provisions of the law or orders of the authorities;

- personnel expressly authorized by the Data Processor, pursuant to Article 30 of the Law and Article 29 of the Regulation, necessary to carry out activities strictly related to the provision of services / products, who are committed to confidentiality or have an adequate obligation confidentiality lawyer and who have received adequate operating instructions;

The complete list of Data Processors is available by sending a written request to the Data Controller.

5) TRANSFER OF PERSONAL DATA

Some of your personal data is shared with recipients who could be found outside the Republic of San Marino and the European Economic Area (EEA). The Data Controller ensures that the processing of your personal data by these recipients takes place in compliance with the Law and the Regulations. Indeed, transfers may be based on an adequacy decision or on the Standard Contractual Clauses approved by the European Commission. More information is available from the Data Controller.

6) EXISTENCE OF AN AUTOMATED DECISION-MAKING PROCESS, INCLUDING PROFILING

The Data Controller does not adopt an automated decision-making process on the processing of personal data, including profiling, referred to in Article 22 of the Law and Regulations.

7) DATA RELATING TO MINORS UNDER THE AGE OF 18

Children under the age of 18 cannot provide personal data. The Data Controller will not be in any way responsible for any collection of personal data, as well as false statements, provided by the minor, and in any case, if they are used, the Data Controller will facilitate the right of access and cancellation forwarded. by the guardian, custodian or by whoever exercises parental responsibility.

8) RIGHTS OF THE INTERESTED PARTIES

The interested parties have the right to obtain from the Data Controller, in the foreseen cases, access to personal data and the correction or cancellation of the same or the limitation of the processing that concerns them or to oppose the processing (articles 15 and following of the Law and Regulations). The appropriate request to the Data Controller is presented by contacting the identified email for correspondence with the interested party.

9) RIGHT OF COMPLAINT

Interested parties who believe that the processing of their personal data is in violation of the provisions of the Law and Regulations, have the right to lodge a complaint:

- if in the territory of the Republic of San Marino to the Authority for the Protection of Personal Data (www.garanteprivacy.sm), as required by art. 66 of the Law, or to take appropriate judicial offices (art. 70 of the Law);

- if in the territory of the European Union to the Italian Personal Data Protection Authority (www.gpdp.it), as required by art. 77 of the Regulation itself, or to take appropriate judicial offices (Article 79 of the Regulation).

10) METHOD OF EXERCISE OF RIGHTS

To exercise the aforementioned rights, you can access the Privacy section of the website www.colombinigroup.com, use the appropriate form made available, alternatively you can contact the persons in charge of responding to the data subject:

- Data Controller:

Privacy office c / o Colombini Group S.p.A., strada Cà Valentino, 124 - 47891 Falciano (RSM), email privacy@colombinigroup.com, Tel. (+378) 0549 975611

- Data Protection Officer (DPO):

PRIVACY365 S.r.l., via Alfonso Gangi 11 - 47891 Dogana (RSM), email dpo@colombinigroup.com - Tel. (+378) 0549 964586

- European Union Representative of San Marino Data Controllers:

PRIVACY365 Italia S.r.l. viale Berna 9 / B - 47924 Rimini (RN) - art27gdpr@privacy365.eu - PEC: privacy365italia@pec.it - Tel. (+39) 0541 1647198

11) MODIFICATIONS

The Data Controller reserves the right to modify and / or supplement this Information at any time and undertakes to publicize the changes on the website www.colombinigroup.com in the Privacy section and / or to inform the Customers in the manner deemed most appropriate.