

PRIVACY POLICY

Pursuant to and for the purposes of art. 13 of Regulation (EU) no. 2016/679 of the European Parliament and of the Council of 27 April 2016 relating to the protection of individuals with regard to the processing of Personal Data, as well as the free movement of such Data (the "**Regulation**" or the "**GDPR**") and of the legislative decree 30 June 2003, n. 196 "Code regarding the protection of personal data" ("**Code**") (Code and Regulation also defined jointly as "**Regulations**"), interested parties are informed ("**Interested**") that their Personal Data will be processed in compliance with the current **legislation** Regulations and what is specified below.

definitions

- **Authorized**, the natural persons authorized to perform processing operations under the direct authority of the owner or manager, pursuant to art. 29 of the Regulation and art. 2-quaterdecies of the Code.
- **Communication**, giving knowledge of personal data to one or more subjects other than the Interested Party, the representative of the Data Controller in the territory of the State, by the Responsible, by the Authorized and by the Designated, in any form, also by means of their provision or consultation.
- **Designated**, the natural persons to whom specific tasks and functions related to the processing of Personal Data are attributed and who operate under the authority of the Owner or Manager, pursuant to art. 2-quaterdecies of the Code.
- **Personal Data or Data**, any information concerning a natural person, identified or identifiable, even indirectly, by reference to any other information, with particular reference to an identification such as name, an identification number, location data, an online identifier or one or more characteristic elements of its physical, physiological, genetic, psychic, economic, cultural or social identity.
- **Dissemination**, giving knowledge of personal data to unidentified entities, in any form, including by making available or consultation.
- **Guarantor**, the supervisory authority in art. 51 of the Regulation.
- **Information or Privacy Policy**, this document.
- **Interested**, the natural person who sends a message in the "*Contacts*" section on the Site.
- **Security Measures**, the complex of technical, informational, organizational, logistical and procedural adopted by the Data Controller to guarantee a level of security appropriate to the risk of processing pursuant to art. 32 of the Regulation.
- **Responsible**, the natural or legal person, public authority, agency or other organization that processes Personal Data on behalf of the Data Controller.
- **Responsible for Data (RPD or DPO Protection)**, the natural or legal person assisting the owner or manager with regards to the fulfillment of the obligations included in the Regulations, shall be the contact point for the supervisory authority and cooperates with the latter, it provides, if requested, an opinion on the assessment of the impact pursuant to art. 35 of the Regulation, monitors the compliance of the Regulation by the Owner or Manager.
- **Site**, <https://www.eggup.co/>.
- **Holder**, the natural or legal person, public authority, agency or other body which, individually or together with others, determines the purposes and means of the Personal Data Processing; when the purposes and means of such Processing are determined by Union or Member State law, the Data Controller or the specific criteria applicable to its designation may be established by Union or Member State law.
- **Treatment**, 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 collection, registration, organization, structuring, storage, adaptation or modification, extraction,

consultation, use, communication by transmission, dissemination or any other form of making available, comparison or interconnection, limitation, cancellation or destruction.

For the purposes of this **Policy**, the following pairs of terms are to be considered equivalent: "**Eggup / Holder**".

Information on the treatment of personal data

1. Types of data processed

1. *Data processed automatically by the Site*, understood as that Data processed automatically by the IT systems responsible for the operation of the Site, whose transmission is implicit in the use of internet network communication protocols. This category includes, for example, the IP addresses of the devices used by the interested party that connects to the site, the URL addresses of the requested resources, time of request, the method used to submit the request to the server, the numeric code of the response provided by the server, some parameters regarding the operating system and computer environment of the interested party.
2. *Data provided directly by the interested party*, understood as the data voluntarily provided by the interested party in filling out the contact request form on the site (e.g. name and surname, email).

2. Purpose of the Treatment

Purpose of the treatment	Legal basis
The data referred to in art. 1.1 are processed automatically by the Site.	The treatment put in place for this purpose are carried out on the basis of a legitimate interest of the Owner (correct functioning of the Site).
The data referred to in art. 1.2 are processed in order to allow the interested party to send a contact request to Eggup.	The treatment put in place for this purpose are carried out for the purpose of the execution of a contract of which the interested party is a part or for the execution of pre-contractual measures adopted at the request of the same.

3. Processing methods and categories of Recipients.

1. Unless otherwise expressly provided for in this Policy, the interested party is informed that the processing of his personal data is carried out using manual systems and / or IT, telematic or automated systems, in compliance with the principles of relevance, lawfulness, correctness and intended purposes by the Regulations.
2. The Data Controller processes the Personal Data of the Data Subject by adopting the appropriate Security Measures aimed at minimizing the risks of unauthorized access, Dissemination, loss and destruction of the aforementioned Data, pursuant to the Regulations.
3. The interested party is also informed that the processing of personal data for the fulfillment of the aforementioned purposes may be carried out by the Data Controller directly

or by availing itself of the collaboration of other subjects, as Managers, Designated or Authorized (e.g. employees and / or collaborators of the Owner). In particular, Personal Data could be communicated to the following categories of Managers:

- ☐ Companies, professionals or external IT consultancy and assistance companies
- ☐ Email Service Managers (i.e. Aruba email, Gmail etc.).

4. The list of Managers can be consulted at any time by submitting a request to the email address indicated in the following **art. 7.1**.

4. Data transfer

1. The interested party is informed that the personal data processed by the owner may be transferred to other countries belonging to the European Union.
2. The Data Subject is informed that the Personal Data processed by the Data Controller may be transferred to other countries outside the European Union, for which an adequacy decision of the Commission exists.

5. Data Retention Period

1. Personal Data will be processed by the Data Controller for the time necessary to process the contact request formulated by the interested party, as well as for the execution of the related and consequent obligations (e.g. sending a quote) and / or for own defensive purposes until the expiry of the applicable statutory limitation period.
2. The right to process some Personal Data also remains for a longer period of time, where required by specific laws.

6. Rights of the interested party

1. The interested party may exercise the rights provided for by the Regulation at any time pursuant to articles 15-22. In particular:
 - ☐ The interested party has the right to ask the Data Controller for access to Personal Data, pursuant to and within the limits set out in art. 15 of the Regulation.
 - ☐ The interested party has the right to ask the Data Controller to correct inaccurate Personal Data, pursuant to and within the limits set out in art. 16 of the Regulation.
 - ☐ The interested party has the right to ask the Data Controller to delete the Personal Data, pursuant to and within the limits set out in art. 17 of the Regulation.
 - ☐ The interested party has the right to ask the Data Controller to limit the processing of personal data, pursuant to and within the limits set out in art. 18 of the Regulation.
 - ☐ You have the right to ask the Data Controller communication of their personal information in structured format, readable by automatic device, pursuant to and within the limits of Art. 20 of the Regulation.
 - ☐ You have the right to object to the processing by the Data Controller, pursuant to and within the limits of Art. 21 of the Regulation.
 - ☐ The interested party has the right to lodge a complaint with a supervisory authority.
 - ☐ The interested party has the right to withdraw consent to the processing, with reference to the treatments that are based on the legal basis referred to in art. 6.1, lett. a) or 9.2, lett. a) of the Regulations. Pursuant to art. 7, paragraph 3 and art. 13, paragraph 2 lett. c) of the Regulation, the interested party is informed that, in any case, the revocation of consent does not affect the lawfulness of the treatment based on consent before the revocation itself.

7. Data Controller

1. For the purposes of this information, the Owner means: Eggup Srl, with headquarters in 00192 Rome RM, Viale Giulio Cesare 128, CF / PI 12584791003, mail: info@eggup.co.

8. Changes to this Privacy Policy

1. The Data Controller reserves the right to make changes to this Privacy Policy at any time, by advertising the Data Subject by email and / or equivalent means.
 2. In the event of non-acceptance of the changes made to this Privacy Policy within the terms that will be communicated from time to time, the interested party is invited not to send further contact requests.
 3. Except as otherwise specified and without prejudice to the rights referred to in articles 15-22 of the Regulation, it is in any case understood that the previous Privacy Policy will continue to apply to contact requests still in progress by Eggup.

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