

Privacy Notice

Pursuant to the European Regulation 2016/679 (hereinafter also “**GDPR**”) and the Legislative Decree 196/2003, as amended by the Legislative Decree 101/2018, **with this notice** we want to provide you with some useful information to explain how we will process the personal data you provide when you visit the website “**abaco-gsa.it**” (hereinafter also “**Website**”).

We would like to point out that this policy only applies to this Website and not to third-party websites that may be reached through links on the Website. Furthermore, this policy may be subject to periodic updates or changes, which will be published on the Website.

When consulting the policy, it is important to keep in mind that **personal data** means any information concerning an identified or identifiable natural person (hereinafter also “**Data Subject**”); an identifiable person is one who can be identified, directly or indirectly, with particular reference to an identifier such as a name, an identification number, location data, an online identifier or one or more factors specific to his or her physical, physiological, genetic, mental, economic, cultural, or social identity.

The Data Controller

Data controller means the natural or legal person, public authority, agency, or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

The **Data Controller** for the data collected through this Website is **Abaco S.r.l.**, represented by its current legal representative, with registered office at via Isonzo 11, 37126 – Verona (Italy), tax code and VAT number 01707210231, no. REA 192357 (hereinafter also “**Data Controller**”).

For any information regarding the processing of your personal data, you can write to the **email address** privacy@abaco-gsa.it.

The Data Protection Officer (“**DPO**”) appointed by the Data Controller pursuant to Articles 37 et seq. of the GDPR can be contacted by sending an email to the address dpo@rblex.it.

Data Collected, Purposes and Legal Basis for the Processing, Nature of the Data Provision

When you visit the Website, we only process **browsing data**, as our servers temporarily store each access in a log file. Specifically, technical data such as the IP address of the requesting computer, the name of the owner of the IP address range, the date and time of access, the website from which the access was made (Referer URL), including the search term used – if applicable – the name and URL of the retrieved files, the status code, the operating system of your computer, the browser you used, and the transmission protocol used are stored until they are automatically deleted after a maximum of 2 years. The processing of these data allows you to use the Website and allows us to guarantee the security and stability of the system, and to obtain anonymous statistical information.

The provision of these data is mandatory for browsing the Website and the legal basis for this type of processing is our legitimate interest pursuant to Article 6(1)(f) GDPR.

We inform you that our Website does not use any cookies or similar technologies.

We inform you that we may also process the data you provide **to prevent abuse and fraud, to establish**, for instance, in the event of cybercrimes committed against our Website, network infrastructure attacks, or other unauthorised or abusive use of our Website, **to establish, exercise or defend a legal claim of the Data Controller, and to transmit data to bodies and public authorities, in compliance with legal and regulatory provisions**. In these cases, the legal basis for the processing is the legitimate interest of the Data Controller and the fulfilment of legal obligations, in accordance with Article 6(1)(f) and (c) of the GDPR.

Data Retention Methods and Period

Personal data will be stored mainly in electronic form, using specific security measures to prevent any data breach, such as data loss, unlawful or incorrect use, and unauthorised access. However, due to the nature of online transmission, these measures cannot completely limit or exclude any risk of data loss or unauthorised access. To this end, it is advisable to periodically check that you have adequate software devices to protect data transmission over the network, both incoming and outgoing (such as updated antivirus systems) and that your Internet service provider has adopted appropriate measures for the security of data transmission over the network (such as firewalls and anti-spam filters). Rozes employees and contractors who come into contact with your personal data have been duly authorised to do so and are required to maintain confidentiality and to comply with data protection regulations.

Regarding data retention, browsing data will be stored for a maximum period of 2 years.

If the processing becomes necessary to pursue further legitimate interest of the Data Controller (e.g. to prevent abuse and fraud, to establish, exercise or defend a legal claim) or to comply with legal obligations, the retention period will vary depending on the applicable legislation.

Subsequently, once the aforementioned reasons for processing no longer apply, the data will be deleted, destroyed, or stored anonymously.

Data Transfer outside the EEA

Except as further specified in the cookie policy, we inform you that personal data are stored on servers located within the European Union. Any transfer of data outside the European Union or to an international organisation will take place in accordance with applicable laws, in particular the provisions contained in Chapter V of the GDPR. In this case, the Data Controller will provide you with any further information regarding the conditions on which the transfer is based.

Your Rights

For a better understanding of your rights under the law regarding the processing of personal data, we invite you to consult in full Articles 15 and following of the GDPR. For your convenience, we have provided an excerpt of these provisions below.

- **Right of access** (Article 15 GDPR): you can request confirmation as to whether or not personal data concerning you are being processed, and, where that is the case, access to the personal data and further information about the processing.
- **Right to rectification** (Article 16 GDPR): you can request that the data you have provided, or otherwise held by the Data Controller, be corrected, or completed if they are inaccurate or incomplete.
- **Right to erasure** ("right to be forgotten") (Article 17 GDPR): you can request that the data collected or processed by the Data Controller be deleted without undue delay, if (i) they are no

longer necessary for the purposes for which they were collected, (ii) the consent has been withdrawn and there is no other legal basis for the processing, (iii) the data subject has objected to the processing, (iv) the data have been unlawfully processed, or (v) there is a legal obligation to erase the data.

- **Right to restriction of processing** (Article 18 GDPR): you have the right to obtain restriction of processing of your personal data where one of the following applies: (i) you contest the accuracy of the personal data, for a period enabling the Data Controller to verify the accuracy of the data; (ii) the processing is unlawful and you oppose the erasure of the personal data, requesting instead the restriction of their use; (iii) the Data Controller no longer needs the personal data for the purposes of the processing, but the data are required by you for the establishment, exercise or defence of legal claims; (iv) you have objected to processing pursuant to Article 21(1) of the GDPR, pending the verification whether the legitimate grounds of the Data Controller override those of the data subject.
- **Right to data portability** (Article 20 GDPR): you have the right to (i) receive your data in a structured, commonly used, and machine-readable format, (ii) have your data transmitted directly from the Data Controller to another controller, if technically feasible, (iii) transmit your data to another controller without hindrance from the Data Controller.
- **Right to object** (Article 21 GDPR): you have the right to object, at any time, to the processing of your personal data for grounds relating to your particular situation, where the processing is based on the legitimate interest of the Data Controller, or the performance of a task carried out in the public interest or in the exercise of official authority vested in the Data Controller. This includes profiling. The Data Controller shall no longer process the personal data unless it demonstrates compelling legitimate grounds for the processing which override your interests, rights, and freedoms, or for the establishment, exercise or defence of legal claims.
- **Automated decision-making, including profiling** (Article 22 GDPR): you have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.
- **Right to withdraw consent** (Article 7(3) GDPR): you have the right to withdraw your consent at any time, without affecting the lawfulness of the processing based on consent before its withdrawal.

P To exercise the aforementioned rights, you can send a request to the Data Controller by writing to the contact details of Abaco indicated in the header of this policy.

Finally, we inform you that you have the right to lodge a complaint with the competent Data Protection Authority, which in Italy is the Garante per la Protezione dei Dati Personali.

Last update: 25/11/2024