



Revision of
24/05/2021

PRIVACY POLICY START ROMAGNA S.P.A. WEBSITE

provided pursuant to arts. 13 and 14 of EU Regulation no. 2016/679

EU Regulation no. 2016/679 and Italian Legislative Decree no. 196 of 30/06/2003, also known as the "Personal Data Protection Code", provide for the protection of persons and other parties with regard to the processing of personal data. In particular Start Romagna S.p.A. is required to provide certain information regarding the use of the Data Subject's personal data.

The processing of the data will be based on the principles of lawfulness, fairness, and transparency and the protection of the Data Subject's confidentiality and rights.

This informative notice, which applies to the collection of data through Start Romagna S.p.A. web portals, takes into account Recommendation no. 2/2001 of the European Data Protection Authorities concerning the minimum requirements for the collection of on-line data in the territory of the European Union.

DATA CONTROLLER

The "Data Controller" is Start Romagna S.p.A. with registered office at Viale C. A. Dalla Chiesa 38, Rimini.

DPO - Data Protection Officer

Start Romagna S.p.A. has appointed a Data Protection Officer (DPO) who can be contacted at the following e-mail address: dpo@startromagna.it

PURPOSES AND METHODS OF PROCESSING

PURPOSES OF PROCESSING: the data you provide will be processed for the following purposes: to allow access to the services offered on the company website **www.startromagna.it**. More precisely:

- to establish and execute contractual relationships with data subjects (e.g. online purchases), and consequent obligations;
- to reply to requests for information from members of the public, customers, and third parties (e.g. law enforcement agencies, public administrations);
- to respond to communications and reports from members of the public and customers;
- to provide information on mobility;
- to respond to reports and complaints sent via a dedicated form;
- to respond to reports of unlawful conduct sent via a dedicated form;
- to apply online in response to the publication of a call for applications.



This disclosure is provided exclusively for the website www.startromagna.it and not for any other websites that may be consulted by the user via links.

PROCESSING METHODS: Personal data will be processed for the purposes of establishing and executing contractual relations with data subjects, providing the requested services, and responding to reports and complaints. Processing is carried out on paper and with electronic and automated means.

The data requested will be adequate for the purposes set out above, processed in a manner that is relevant to those purposes, and limited to those purposes. Specific security measures are taken to prevent data loss, unlawful or incorrect use, and unauthorised access.

CATEGORIES OF DATA PROCESSED

DATA FOR ACCESSING SERVICES

The mandatory data requested in order to access the services offered by the company website are: "personal" including bank details and "special" (e.g. biometric and criminal history data).

DATA PROVIDED VOLUNTARILY BY THE USER

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

BROWSING DATA

During normal operation, the computer systems and software procedures used to operate the website acquire certain personal data. The transmission of such data is implicit in the use of Internet communication protocols. This information is not collected in order to be associated with identified data subjects but, by its very nature it could allow users to be identified through processing and association with data held by third parties. This category of data includes IP addresses or domain names of computers used by users connecting to the website, URI (Uniform Resource Identifier) of requested resources, the time of the request, the method used to submit the request to the server, the size of the files obtained in response, the numerical code indicating the status of the response from the server (successful, error, etc.), and other parameters relating to the user's operating system and IT environment.

These data are used only to obtain anonymous statistical information on the use of the website and to check that it is functioning correctly. The data could be used to determine responsibility in the event of hypothetical computer crimes against the website. The data are deleted after 12 months.

DATA ACCESSIBILITY

Within the Data Controller's organisation, your data can be accessed by the employees of the Pass Office, the Administrative Department, the Registry and Secretariat, the Technical Department,



the Legal Department, the Human Resources Department, the Purchasing Department, the Customer Service Department, and the ICT Department. They are authorised to process the data and have been adequately trained.

As regards reports of unlawful conduct, on the other hand, your data can be accessed only by the Anti-Corruption and Transparency Officer (RPCT) and the ICT Department.

The data are made accessible to external entities with which Start Romagna S.p.A. collaborates and which Start Romagna S.p.A. has appointed as "Data Processor" for the data processing necessary to provide systems engineering support and maintenance of IT applications and software for the management of online services.

RECIPIENTS OR CATEGORIES OF RECIPIENTS

The data may be disclosed or disseminated in those cases envisaged by regulatory provisions or administrative measures.

In addition to communications made in fulfilment of legal and contractual obligations, all data collected and processed may be disclosed exclusively for the purposes specified above to the following third parties:

- Public bodies (Provinces of Rimini, Ravenna, and Forli-Cesena; Basin Authority; Emilia-Romagna Region; various municipalities; public health authorities; tax offices; etc.);
- Public or private entities, including health care bodies;
- Control and supervisory bodies;
- Banks in relation to the payment of the requested service;
- Judicial authorities.

The identity of Third Parties that receive the data may be requested at any time from the Data Controller (and/or the Data Processor, if one has been appointed).

RETENTION

All the aforesaid data shall be retained for the purposes set forth in this disclosure and, at the very least, for the period of validity of the requested service or, in cases where this is provided for, within the mandatory time limits established by law.

In the case of reports and complaints: for the period necessary to complete the internal assessment of the reports, at the end of which the report will be anonymised or encrypted.

In the case of reports of unlawful conduct: for the period necessary to carry out internal investigations, at the end of which the report will be anonymised or encrypted.

FREEDOM TO PROVIDE DATA AND GIVE CONSENT, CONSEQUENCES OF A REFUSAL

Providing the minimum data requested is mandatory in order to access the services requested. Any refusal to respond will make it impossible to implement the contractual relationship and/or provide the requested services.



There is no automated decision-making process within the scope of this processing, including profiling as set out in article 22, paragraphs 1 and 4 of EU Regulation 2016/679.

RIGHTS OF THE DATA SUBJECT

The Data Subject may contact the Data Controller in order to exercise his/her rights as provided for in Articles 15 to 22 of EU Regulation 2016/679 and which are set out below:

the right to ask the data controller for access to your personal data (Art. 15);
the right to ask the data controller to rectify your personal data (Art. 16);
the right to ask the data controller for the erasure of your personal data (Art. 17);
the right to ask the data controller to restrict the processing of your personal data (Art. 18); the right to data portability (Art. 20);
the right to object to the processing of your personal data (Art. 21);
the right in relation to automated decision-making processes (Art. 22).

If the processing is based on Article 6(1)(a) or Article 9(2)(a), the Data Subject has the right to withdraw consent at any time without affecting the lawfulness of the processing based on the consent given before the withdrawal.

The Data Subject also has the right to lodge a complaint with a supervisory authority.

If the Data Controller intends to further process the personal data for a purpose other than that for which they were collected, he/she shall, prior to such further processing, provide the Data Subject with information about that other purpose and any additional information necessary to ensure correct and transparent processing.

Ref. no. 11573/21

Rimini, 24 May 2021