

**INFORMATION ON THE PROCESSING OF PERSONAL DATA PURSUANT TO ARTICLE 13 OF REGULATION
(EU) 679/2016**

(General Data Protection Regulation - GDPR)

This document describes how and for what purposes the personal data of the users who access and use the website www.ewitness.eu (hereinafter also referred to as just "Site") are processed in accordance with applicable personal data protection regulations.

In addition, as required by the principles recognised under Regulation (EU) 679/2016, this document provides the user (Data Subject) with any additional information necessary to ensure fair and transparent processing, taking into account the specific context in which the personal data are collected and subsequently processed.

This information is provided only for the Site and the relevant sub-domains, and not also third-party websites accessible through links found on the Site, for which the Data Controller is in no way responsible.

1. Data Controller and Data Protection Officer (DPO)

The Data "Controller" is eWitness Italia S.r.l., with registered office in Via Turati 29, 20121, Milan, phone +02 637889934, e-mail italia.office@ewitness.eu VAT No. 06044690961 Economic and Administrative Register No. 1867457

The contact details of the Data Protection Officer (DPO) are: andrealisi@studiolegalelisi.it.

2. Nature of the provision of data

To use some of the Site's services, the user may be required to provide the personal data necessary to ensure access to said services: specifically, to fill out the forms in the "[Contacts](#)" and "[Work with us](#)" sections, the data marked with an asterisk must be provided to manage and reply to the communications sent by the user. In any case, please note that users are free to provide the requested data, i.e., they are not legally required to provide them: the failure to provide the data marked as required, however, will make it impossible to receive the requested service.

3. Types of data processed and purposes of processing

Only the personal data necessary to use the Site and its functionalities are processed. The types of data processed include, specifically:

- i. browsing data, collected automatically, exclusively to obtain aggregated and anonymised statistical information about the use of the Site (including, but not limited

to, IP addresses, browsing times, geographical data, and other parameters relating to the user's operating system and IT environment); however, such information could allow determining the identity of the user, including through processing and/or cross-referencing with other data, stored by the provider or third parties; browsing data may be cross-referenced, with the user's consent, with the personal data provided by filling out the contact forms on the Site to allow for informational and promotional phone calls and e-mails concerning eWitness's products, services, and initiatives as well as to guide marketing strategies, based on the user's browsing profile. For more information, see our [cookie policy](#);

- ii. data provided voluntarily by the user, in any format (textual, graphical, audiovisual, multimedia, etc.) including data entered by filling out the forms in some sections of the Site (including, specifically, the forms in the "[Contacts](#)" and "[Work with us](#)" sections) and by sending e-mails to the addresses listed on the Site. The Controller may acquire and store the data provided by the user in electronic form for purposes associated with their collection through the Site, and such data shall never be used for profiling or direct marketing purposes. Specifically, the optional and voluntary submission of e-mails to the addresses listed on the Site results in the acquisition and, therefore, processing of the sender's address and any other personal data included in the message, to the extent necessary to respond to the Data Subject's requests.

The personal data of the user (Data Subject) are collected and processed for purposes associated with the rendering of the services offered through the Site, including the performance of technical support and maintenance services and, more generally, operations instrumental to ensuring the Site works correctly. The Data Subject's personal data may be used also for other processing operations as long as these are compatible with such purposes.

Specifically, the user's personal data may be processed for the following additional purposes:

- a) with respect to the data provided by filling out the form in the "[Contacts](#)" section (personal details, e-mail address, and any other personal data provided), to reply to the messages sent by the user;
- a) with respect to the data provided by filling out the form in the "[Work with us](#)" section (personal details, e-mail address, *curriculum vitae*, and any other personal data provided), to recruit and potentially hire employees;

4. Data processing methods and storage periods

The data shall be processed using paper-based and/or computer tools, including through entities authorised to do so, operating under the direct authority and according to the Controller's instructions, based on rationales closely related to the stated purposes and, in any case, so as to guarantee the security and confidentiality of the data being processed.

Processing is performed in a way that ensures the security of data and systems. Specific security measures are in place to minimise the risks of deliberate or accidental destruction or loss of the data, unauthorised access, or processing not permitted or consistent with the purposes set out in

this document. Specifically, the Site uses the HTTPS protocol to authenticate the server and encrypt the communication channel. The security measures adopted, however, do not entirely rule out the risks that the personal data transmitted with electronic tools could be intercepted or compromised. Therefore, we recommend ensuring that the user's device is equipped with appropriate software systems to protect the electronic transmission of both incoming and outgoing data (such as, for instance, updated antivirus systems, firewalls, and antispam filters).

The data which are subject to processing shall be stored for no longer than is necessary for the purposes for which they have been collected or subsequently processed. Specifically:

- a) the data provided by filling out the form in the "[Contacts](#)" section shall be stored for the time strictly necessary to communicate with, and reply to the requests submitted by, the user;
- b) the data provided by filling out the form in the "[Work with us](#)" section shall be stored for the time necessary for recruitment and, in the event a candidate is hired, throughout the term of the employment relationship.

4. Categories of recipients

The data subject's personal data may be disclosed to:

- duly authorised contractors and employees of the Controller, within the scope of the relevant duties;
- external providers, to perform processing related to the rendering of services to the user (including Digital360 S.p.A. for the analysis of the user's browsing data and profiling for commercial and marketing purposes). Personal data shall never be disclosed, disseminated, sold, or transferred to third parties for illicit purposes and, in any case, without duly informing the data subjects and acquiring their consent, where required by law. The above is without prejudice to the disclosure of data at the request of a court or tribunal or public security authorities, as and where required by law.

5. Transfer of data to third countries and/or international organisations

Personal data shall not be transferred abroad, to countries or international Organisations outside the European Union that do not ensure an adequate level of protection, pursuant to Article 45 of the GDPR, based on an adequacy decision by the EU Commission. Where required to render the services of the Site, personal data shall be transferred to countries or international Organisations outside the EU for which the Commission has not adopted any adequacy decision pursuant to Article 45 of the GDPR only if the receiving country or Organisation have provided appropriate safeguards, pursuant to Article 46 of the GDPR and on condition that enforceable data subject rights and effective legal remedies for data subjects are available. In the absence of an adequacy decision by the Commission, pursuant to Article 45 of the GDPR, or of appropriate safeguards pursuant to Article 46 of the GDPR, including binding corporate rules, a cross-border transfer shall take place only on one of the conditions under Article 49 of the GDPR.

6. Rights of the data subject

The Data Subject shall have the right to access their own personal data, to have these rectified, updated, and erased or restricted, if incomplete, wrong, or collected in violation of the law, as well as object to their processing on legitimate grounds or obtain the portability of such data.

Specifically, pursuant to Articles 15-22 of the Regulation (EU), the Data Subject shall have the right to obtain confirmation as to whether or not personal data concerning him or her, even if not yet registered, exist, and to receive them in intelligible form.

The Data Subject shall also have the right to access the following information:

- a) the purposes and methods of processing;
- b) the logic involved in the case of processing performed with electronic tools;
- c) the details of the Controller, the Processor, and the entities or categories of entities to which personal data may be disclosed or that could become aware of them as authorised to process personal data.

The Data Subject shall have the right to:

- a) have their data updated, rectified, or completed;
- b) have the data processed in violation of the law, including those not required to be stored for the purposes of the processing, erased, anonymised, or blocked;
- c) obtain restriction of processing, where one of the scenarios under Article 18 of the GDPR applies;
- d) obtain the certification that the operations as per letters a), b), and c) have been brought to the attention of those to whom the data have been disclosed or disseminated, except where this proves to be impossible or would involve an effort manifestly disproportionate to the protected right;
- e) receive the data concerning him or her, provided to the Controller and processed on the basis of the consent given by the Data Subject for one or more specific purposes, in a structured, commonly used, and machine-readable format. Pursuant to Article 20 of the GDPR, the Data Subject shall also have the right to transmit those data to another Controller without hindrance and, where technically feasible, have the personal data transmitted directly from one controller to another.
- f) where processing is based on consent, withdraw his or her consent at any time (as per Article 7(3) of the GDPR).

The Data Subject shall have the right to object, in whole or in part:

- a) on legitimate grounds to the processing of personal data concerning him or her, even if relevant to the purpose for which they are collected;
- b) to the processing of personal data concerning him or her to send advertising material or for direct selling purposes or to conduct market research or for marketing communications.
- c) automated decision-making that significantly affects him or her.

Without prejudice to any other administrative or judicial remedy, the Data Subject shall have the right to lodge a complaint/report/appeal with a Supervisory Authority, in particular in the Member State of his or her habitual residence, place of work or place of the alleged infringement.

7. Exercising the rights

The above rights shall be exercised by sending a request to the Controller via e-mail at privacy@ewitness.eu. The request shall be made freely and informally by the Data Subject, who shall have the right to receive an appropriate response within a reasonable period, depending on the circumstances of the case.

The Data Subject may mandate a not-for-profit body, organisation or association which has statutory objectives which are in the public interest and is active in the field of the protection of Data Subjects' rights and freedoms with regard to the protection of their personal data to exercise his or her rights. In addition, the Data Subject may be assisted by a trusted person.

You can obtain more information on the purposes and methods of processing of personal data by sending an e-mail to privacy@ewitness.eu, including "Privacy" in the subject line.

To know his or her rights, lodge a complaint, and always keep up to date with regulations on the protection of individuals with respect to the processing of personal data, the Data Subject may rely on the Italian Data Protection Authority, visiting its website at <http://www.garanteprivacy.it/>.

Information current as of 26 March 2021