

## INFORMATION ON THE PROCESSING OF PERSONAL DATA

### SITO WEB "PROGETTO DOABLE"

Pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 (the "GDPR")

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This privacy policy (the "**Policy**") is provided in relation to the processing of personal data of users of the website Progetto Doable (the "**Site**"), regarding the applications for informations from users (the "**Data Subject(s)**" or the "**User(s)**")

#### 1. Controller

The Controller is Progetto Doable S.r.l. Società Benefit, with the registered office in via Caduti del Lavoro, 13, 25034, Orzinuovi (BS) ("**Progetto Doable**", the "**Company**" or the "**Controller**").

If you have any doubts about how the Company processes personal data, you can always contact it at the addresses indicated in section 8 of this Policy.

#### 2. Data collected

Controller collects only the personal data that are pertinent to and do not exceed the purpose of the processing described in section 3 of this Policy. Personal data are collected electronically by filling in the online form on the Site all in compliance with the applicable data protection legislation, including the GDPR.

The data collected are, in particular, identification data (*e.g.*, first name, last name, company name), contact data (*e.g.*, address, e-mail address and company telephone number), as well as any and all information provided by the Data Subject in the *form* fields that may qualify as personal data pursuant to the GDPR (jointly, the '**Data**' or 'Personal Data').

The Data marked with an asterisk, within the *form*, are mandatory in order to achieve the purpose of the processing.

We invite Users to refrain from providing personal data of third parties and further personal data unless essential for the fulfilment of the purposes described in section 3.

#### 3. Purpose of processing and legal basis

##### a) Submission of application

Data will be processed for the purposes set out in the form.

The **legal basis** for the processing of Data is the **legitimate interest of the Controller** in assessing the applications submitted by the Users. Legitimate interest that does not prejudice the rights and freedoms of the Users insofar as it is reasonable to assume that - considering the manner (and the reasons) the

Data have been acquired for - the Users has a corresponding interest in being contacted in order to receive feedback on the application.

*b) Analysis of information communicated through the application*

The Data may also be processed to keep track of the performance and use of the Site, as well as the type of requested information submitted by Data Subjects, so as to improve the services offered as well as to ensure a better experience for the Data Subject.

The **legal basis** for the processing is the **legitimate interest of the Controller** to analyze the performance of the Site for internal analysis and management purposes. Legitimate interest that does not affect the rights and freedoms of the Data Subjects as the Data do not fall within the special categories of personal data under the GDPR and their processing for this purpose is carried out for internal statistical purposes.

*c) Communications about services and products of interest*

Personal Data may, in addition, be processed to send by e-mail, communications having a commercial, promotional and advertising nature related exclusively to the products and/or services offered by Progetto Doable through the Site or products and/or services complementary to those towards which the application was submitted by filling out the form.

The **legal basis** for processing resides in the **legitimate interest of the Controller** to keep Users informed and updated on promotions and/or initiatives promoted by Progetto Doable, as well as on the offer of new products and/or services from time to time available on the Site, complementary to those that the User has shown interest in by submitting the application. This legitimate interest is balanced and compatible with the interest of the User, as it is reasonable to assume that those who submit their application are interested to receive updates on the catalog of complementary products and services.

At any time, the Data Subject has the possibility to object to the processing carried out for the purposes described above, easily (by following the procedure indicated in any commercial communication or by using the addresses of the Controller listed in section 8) and free of charge.

Any opposition to the processing by the Data Subject will not affect the lawfulness of the processing carried out up to that point, nor will it have any effect on the future purchase of products/services offered by Progetto Doable.

#### 4. Data Recipients

The Data will be processed by the Controller and by the subjects specifically instructed (for example, subjects in charge of managing the information systems, the legal function, the administrative function, etc.) and may be communicated to third parties, autonomous controllers or data processors, who provide services in favour of the Company (*e.g.*, cloud storage providers, legal and tax consultants, service providers of the Company, etc.) where necessary to achieve the above purposes.

## 5. Place of Data Processing

The Data will be processed at the premises of the Company, and they will be stored on servers and/or archives located inside or outside the European Union.

The transfer outside the European Union may take place only and exclusively in countries that offer Data protection similar to that guaranteed by EU law or, in any case, subject to the adoption of adequate safeguards pursuant to Article 46 of the GDPR aimed at ensuring a level of Data protection similar to that guaranteed within the European Union.

## 6. Method of processing and data retention period

Data will be processed either in paper form or by telematic and electronic means, using systems that ensure their protection, security and confidentiality.

The Controller has also adopted specific and adequate logical, legal, organisational and technical security measures to prevent the loss of Data, unlawful or unauthorised use thereof and unauthorised access thereto.

Data are processed only for the time strictly necessary to achieve the purposes for which they were collected. The Data shall be retained for as long as necessary to analyse and respond to the requests received and, in any case, for no longer than 18 months from the moment of their acquisition. Should the User proceed with the purchase of products and/or services of Progetto Doable, the Data shall be processed according to the purposes and under the terms indicated in the privacy policy relating to the contractual relationship established between the parties.

The Data processed for sending communications about services and products complementary to those for which the User has applied, will be stored in a form that allows the identification of the Data Subject for a period of 12 months from the moment of their acquisition and, in any case, until the Data Subject expresses the intention to unsubscribe from the service through the appropriate procedure or by contacting the Controller at the addresses listed in section 8.

## 7. Rights of Users

Users are entitled to the rights conferred by the GDPR pursuant to Articles 12-23 of the GDPR. In particular, Users have the right to request and obtain, at any time: **(i)** access to their Data; **(ii)** information about the processing carried out; **(iii)** rectification and/or updating of the Data; **(iv)** erasure of the Data; **(v)** restriction of the processing; **(vi)** to exercise the right to object to the processing; **(vii)** Data portability (*i.e.*, receiving the Data in a structured, machine-readable format for common use); **(viii)** to exercise the right to withdraw consent to the processing of the Data where such consent is the legal basis for the specific purpose the processing is carried out for (this, in any case, shall not affect the lawfulness of the processing carried out on the basis of the consent given before the revocation); and, finally, **(ix)** to lodge a complaint with a data protection authority (in Italy: *Garante per la Protezione dei Dati Personali*).



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## 8. Contact details

The aforementioned rights may be exercised at any time, by simple request to the Controller, to be transmitted:

- to the e-mail address: [info@progettodoable.it](mailto:info@progettodoable.it)
- by mail, to the address of via Caduti del Lavoro, 13, 25034, Orzinuovi (BS).

For further information or clarification of the rights mentioned, you may contact the Controller at the same address.

Last update: July 26, 2024