

Imagicle Privacy Policy – Surveys

(General Data Protection Regulation – GDPR 2016/679)

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a company part of Zucchetti spa

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This policy is relayed to natural persons and natural persons operating in the name and on behalf of legal entities pursuant to Art. 13 or 14 of the GDPR 679/2016 – “European regulation on the protection of personal data”.

1 Purposes of processing and legal basis

We hereby inform you that the personal data acquired by Imagicle Spa directly from you or through the Company/ Organisation/ Firm of which you are employee/ collaborator will be processed in compliance with the guarantees of privacy and security measures required by current legislation, including with the help of electronic tools directly and/or through third parties, for the purposes set out below together with the relevant legal basis:

PURPOSES	PROCESSED DATA	LEGAL BASIS
A Carrying out surveys aimed at verifying the degree of customer satisfaction regarding the Imagicle products and services offered or requested and aimed at improving the quality of our services.	The personal data already communicated by signing the contract or by using our products (e.g. username, customer ID, first/last name, phone ect.) or communicated by you or your Company, during the drafting of the questionnaires concerning the surveys organized by Imagicle Spa	Processing necessary for the purposes of the legitimate interests pursued by the controller or by a third party. Art. 6 paragr. 1 lett f) *
B For the purpose of publishing, in our web site, social media, brochure, presentations, any statements you may have issued on the products and / or Imagicle services associated with your personal data (name and surname and / or role within the azienda).	Name and surname and / or role within the COMPANY which may also be associated with any statements you may have issued on the products and / or Imagicle services	The Data Subject has given consent to the processing of his or her personal data for one or more specific purposes; Art 6 c.1 lett. a)

* Legitimate interest of the company: to detect the satisfaction of the customers of the Company, to improve the corporate image of the Company and therefore to strengthen its economic performance and to develop its products and services. The range of the personal data processed is limited to the minimum necessary. In light of the above, the processing of personal data is at the service of the legitimate commercial interests of the Company and, at the same time, of the interests of its Customers, as Customers can thus participate in the development of the Company's products and services, which are also used by customers and customer satisfaction can be improved based on the results of satisfaction surveys and the conclusions drawn from them.

2 Compulsory or optional nature of the provision of data and consequences of a refusal to provide

With reference to the purpose referred to in letter A, the provision of data is optional but, in their absence, it will not be possible to carry out the aforementioned surveys.

With reference to the purpose referred to in letter B, the provision of your data is optional and the non-acceptance and provision does not entail any consequences. In case of lack of consent, your data cannot be processed for the purpose described.

3 Retention period

The personal data collected for the purpose referred to in paragraph 1 letters A, will be processed and stored for the period of time necessary to pursue the aforementioned purposes and in any case no longer than 3 years from their collection.

The personal data collected for the purpose referred to in paragraph 1 letters B, will be processed and stored for the period of time necessary to pursue the purposes indicated therein. Furthermore, the Data Controller may be obliged to keep Personal Data for a longer period in compliance with a legal obligation or by order of an authority.

4 Contact details of the Data Controller

The Data Controller of your personal data is Imagicle Spa, responsible for the lawful and correct use of your personal data, and who you may contact for any information or requests at the following addresses:

Registered office: Via Fondacci 272 - 55054 - Massarosa (LU)

Telephone: +39.0584.943232

Fax: +39.0584.943325

E-mail: administration@Imagicle.com

Certified Email: Imagicle@legalmail.it.

You may furthermore address the Data Protection Officer to acquire information and forward requests regarding your data or to communicate disservices or any problem you may have encountered at the following addresses:

Name: Aksilia Srl

Registered office: Via Fontana 22 - 20122 - Milano (MI)

Telephone: +39.02.40703351

E-mail: aksilia@aksilia.com

Certified Email: consiliasrl@pec.it

in the person of the reference manager, Dr. Battaglia Chiara, reachable at the abovementioned contact data and at the following cellphone number: +39.347 8267770.

5 Recipients and data transfer

Your data may be transferred outside the EEC. In this case Imagicle Spa ensures that the processing of your personal data by these subjects to whom the data is transferred, will be done in accordance with the European Regulation 679/2016, in compliance with the principles indicated in art. 45 of the GDPR 2016/679 relating to the existence of an adequacy decision by the European Commission, or in the absence of such decisions in the presence of appropriate safeguards pursuant to art. 46 of the GDPR 2016/679, or in compliance with the principles given in Art. 49 paragr. 1 lett b) – transfer necessary for the execution of a contract concluded between the Data Subject and Imagicle Spa. Further details and copy of the data may be obtained by contacting the Data Controller at the addresses given in point 4.

Your data may be communicated not only to the personnel assigned to the processing but also to the following subjects:

- consultants and companies that assist the Company from an IT and infrastructural point of view
- subsidiaries, investees or associates
- other companies and professionals who collaborate with the Company for the performance of aforementioned surveys and publications

The data will not be subject to other methods of dissemination.

6 Rights of the Data Subject

We inform you that as Data Subject you have, in addition to the right to submit a complaint to the Supervisory Authority, the rights listed below, which you can exercise by making a specific request to the Data Controller and/or the Data Processor, contacting him at the addresses indicated in point 4.

GDPR REGULATORY REF.	RIGHTS OF THE DATA SUBJECT
<p>Art. 15 – Right of access</p>	<p>You have the right to obtain from the Controller, confirmation as to whether or not your personal data are being processed, and where this is the case, access to the personal data and information regarding the processing.</p>
<p>Art. 16 – Right of rectification</p>	<p>You have the right to obtain from the Controller without undue delay, the rectification of inaccurate personal data. Taking into account the purposes of the processing, you have the right to have incomplete personal data completed, also by means of providing a supplementary statement.</p>
<p>Art. 17 – Right of erasure (right to be forgotten)</p>	<p>You have the right to obtain from the Controller, the erasure of your personal data without undue delay and the Controller is obliged to cancel the personal data without undue delay.</p>
<p>Art. 18 – Right to restriction of processing</p>	<p>You have the right to obtain from the Controller, restriction of processing where one of the following applies:</p> <ol style="list-style-type: none"> the accuracy of the personal data is contested by the data subject, for a period enabling the Controller to verify the accuracy of the personal data the processing is unlawful, and the data subject opposes the erasure of the personal data and requests the restriction of their use instead

	<p>c) the Controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defense of legal claims</p> <p>d) the data subject has objected to processing pursuant to Art. 21, paragraph 1, pending the verification whether the legitimate grounds of the controller override those of the data subject</p>
Art. 20 – Right to data portability	<p>You have the right to receive data in structured, commonly used and machine-readable format automatized devices, and have the right to transmit such data to another Controller without hindrance from the Controller to which the data has been given. In exercising your rights regarding data portability, you are entitled to have the data transmitted directly from one Controller to the other, where technically feasible.</p>
Art. 21 – Right to object	<p>You have the right to object at any time to the processing of your personal data on grounds relating to your personal situation, based on Art. 6, paragraph 1, letters e) or f), including profiling based on those provisions. If you provided your consent to one or more specific objectives, you have the right to revoke that consent any time.</p>
Art. 22 – Right to automated decision making, including profiling	<p>You have the right not to be subjected to a decision based solely on automated processing including profiling, which produces legal effects concerning yourself or similarly affecting you.</p>

