

PRIVACY DISCLOSURE MADE ACCORDING TO ART. 13 OF LEGISLATIVE DECREE 30TH JUNE 2003, N.196**AND OF THE ART. 13 OF THE EU REGULATION 2016/679**

DELTAATS s.r.l., VAT number 06408910013, with registered office in Lorzanzè (TO), via Provinciale 35, (hereinafter, "**Owner**"), as data controller, informs you pursuant to art. 13 Legislative Decree 30.06.2003 n. 196 (hereinafter "**Privacy Code**") and of the art. 13 EU Regulation n. 2016/679 (hereinafter "**GDPR**") that your data will be processed in the following manner and for the following purposes:

1-Subject of data processing

- The Owner processes personal, identifying and non-sensitive data (by way of example but not limited to, name, surname, address, telephone number, e-mail address - later on, "personal data" or "data") communicated by you during of signing the contract / subscription / package.
- The Owner also processes your sensitive personal data relating to health conditions.

2-Purpose of the processing

Your personal data is processed:

A) without your express consent (art. 24 letter a), b), c) Privacy Code and art. 6 lett. b), e) GDPR), for the following Service Purposes:

- allow you to access, via your name, the Services requested by you;
- take part in initiatives organized by the Data Controller (for example events);
- fulfill the obligations provided for by the law, by a regulation, by the community legislation or by an order of the Authority;
- exercise the rights of the Data Controller, for example the right to exercise a right in court.

B) With your specific and distinct consent (Articles 23 and 130 of the Privacy Code and Article 7 of the GDPR), for the following Other Purposes:

- send us opinion polls and newsletters, newsletters and / or invitations to events via e-mail or register for events of which it is a party or that the Owner is organizing.

3- Treatment modalities

The processing of your personal data is carried out by means of the operations indicated in the art. 4 Privacy Code and art. 4 n. 2) GDPR and more precisely:

- Collection, registration, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, cancellation and destruction of data.

- Your personal data is subjected to both paper and electronic and / or automated processing, by archiving on a fixed server with the right to make an external disk backup.

- The Owner will process personal data for the time necessary to fulfill the aforementioned purposes and in any case for no more than 10 years from the termination of the Service Purpose Report and for no more than 2 years from the collection of data for the Other Purposes.

4-Security

The Owner has adopted a great variety of security measures to protect your data against the risk of loss, abuse or alteration. In particular, in order to ensure on a permanent basis the confidentiality, integrity, availability and resilience of processing systems and services:

- has adopted the measures referred to in Articles 32-34 Privacy Code and art. 32 GDPR, including the use of encryption and passwords;
- uses Firewall technology to prevent unauthorized access, the server is backed up every day, and an additional back-up is performed on an external disk that is kept in place equipped with security systems such as locked doors, intruder alarm system.

The archive is located in a place equipped with security systems such as locked doors and intrusion alarm system.

5-Access to data

Your data may be made accessible for the purposes referred to in art. 2.A) and 2.B):

- to employees and collaborators of the Data Controller, in their capacity as appointees and / or internal processors and / or system administrators;
- to third party companies or other subjects (for example, web site providers, cloud providers, suppliers, hardware and software support technicians, shippers and carriers, credit institutions, professional offices, etc.) who carry out outsourcing activities for account of the Data Controller, in their capacity as data controllers.

6-Data communication

- Without your express consent (pursuant to art. 24 letter a), b), d) Privacy Code and art. 6 lett. b) and c) GDPR), the Owner may communicate your data for the purposes referred to in art. 2.A) to Supervisory Bodies, Judicial Authorities as well as to all other subjects to whom the communication is obligatory by law for the accomplishment of the said purposes.
- Otherwise your data will not be disclosed.

7-Data transfer

The management and storage of personal data will take place in Europe, on servers located in Italy of the owner and / or third-party companies appointed and duly appointed as data processors.

8-Nature of the provision of data and consequences of the refusal to answer

The provision of data for the purposes referred to in art. 2.A) is mandatory. In their absence, we will not be able to guarantee you neither the registration nor the Services of the art. 2.A). The provision of data for the purposes referred to in art. 2.B) is instead optional. You can then decide to subsequently deny the possibility of processing data already provided: in this case, you will not be able to receive invitations to events, newsletters and opinion polls and ratings via e-mail. In any case, you will continue to be entitled to the Services referred to in art. 2.A).

9-Rights of the interested party

In your quality as interested, you have the rights referred to in art. 7 Privacy Code and art. 15 GDPR and precisely the rights of:

I. obtain confirmation of the existence or not of personal data concerning you, even if not yet recorded, and their communication in intelligible form;

II. get the indication:

- a) the origin of personal data;
- b) the purposes and methods of processing;
- c) the logic applied in the case of processing carried out with the aid of electronic instruments;
- d) of the identification data concerning the data controller, data processors and the representative designated pursuant to art. 5, paragraph 2 of the Privacy Code and art. 3, paragraph 1, GDPR;
- e) the subjects or categories of subjects to whom the personal data may be communicated or who can learn about them as appointed representative in the State, managers or appointees;

III. get:

- a) updating, rectification or, if you are interested, integration of data;
- b) the deletion, transformation into anonymous form or blocking of data processed in violation of the law, including data which does not need to be kept for the purposes for which the data was collected or subsequently processed;
- c) the attestation that the operations referred to in letters a) and b) have been brought to the attention, also with regard to their content, of those to whom the data have been communicated or disseminated, except in the event that such fulfillment occurs it proves impossible or involves a manifestly disproportionate use of resources with respect to the protected right;

IV. object, in whole or in part:

- a) for legitimate reasons, to the processing of your personal data, even if pertinent to the purpose of the collection;
- b) to the processing of your personal data for the purpose of sending advertising material or direct sales or for carrying out market research or commercial communication, through the use of automated call systems without the intervention of an operator by e-mail and / or through traditional marketing methods by phone and / or mail. Please note that the interested party's right of objection, set out in the previous point b), for direct marketing purposes by automated means, extends to the traditional ones and that the possibility for the interested party to exercise the right of opposition also remains valid only partially. Therefore, the interested party can decide to receive only communications using traditional methods or only automated communications or none of the two types of communication.

Where applicable, you also have the rights set forth in articles 16-21 GDPR (Right of rectification, right to be forgotten, right to limitation of treatment, right to data portability, right to object), as well as the right to complain to the Guarantor Authority.

10-Mode of exercising the rights

You can exercise your rights at any time by sending:

- a registered letter sent to DELTATS s.r.l., VAT number 06408910013, with registered office in Lorzanzè (TO), via Provinciale 35;

- a pec at the address atsspa1@legalmail.it

11 Juniores

The owner's services are NOT intended for juniors. In the event that the junior has not completed the sixteenth year of age, the data will be processed, in accordance with the provisions of art. 8 of the GDPR, only with the express consent of the subject in charge of parental responsibility.

12-Owner, manager and appointees

The Owner is **DELTA TS s.r.l.**, VAT number 06408910013, with registered office in Lorzanzè (TO), via Provinciale 35, and by the data processors indicated by it.

CONSENT PERFORMANCE

I, the undersigned party, Mr / Mrs, pursuant to art. 4 of the GDPR (EU Regulation n. 2016/679 which defines the consent as: *"any manifestation of free, specific, informed and unequivocal will of the party with whom he expresses his consent by unequivocal positive declaration or action that the data personal information concerning him is subject to processing"*, declaring that he has previously received a copy of the privacy statement of DELTATS srl, that he has read it, understood it and that he is aware of the possibility of accepting or refusing consent for each single purpose of treatment without receiving constraints and constraints and without obtaining negative consequences in the event of refusal to provide data, knowing that consent is a necessary condition for carrying out the activities indicated below and that consent can be withdrawn at any time with ease, without impediment, and using the same channels used to provide it

SOON MY CONSENT

to processing activities performed for the following purposes:

- allow me to access, by my name, the services I requested;
- take part in initiatives organized by the Data Controller (for example events);
- processing the contact request (s);
- fulfill the obligations provided for by the law, by a regulation, by the community legislation or by an order of the Authority;
- exercise the rights of the Data Controller, such as the right to exercise a right in court;

Place and date signature

- receive opinion and satisfaction surveys, newsletters and / or invitations and / or registration for events via e-mail;
- retain and retain, even after the termination of the relationship, the data I have provided, without exception, in order to send me communications of your commercial initiatives (promotions, discounts, events, etc.).

Place and date signature