

## INFORMATION PURSUANT TO ARTICLE 13 OF REGULATION (EU) 2016/679

of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC

The "**Regulation (EU) 2016/679**" (hereinafter referred to as "**EU Regulation**" or "**GDPR**") in Article 13 imposes the obligation to inform the interested party (data subject) on the key elements of the data processing.

As **MANET MOBILE SOLUTIONS Srl** (referred to below as **MMS**) fully complies with the observance of the provisions of the **GDPR**, it hereby intends to provide you with the necessary information regarding: nature of the data in our possession, purposes and methods of processing personal data, as well as the scope of any communication and/or dissemination thereof.

According to the law indicated, **MANET MOBILE SOLUTIONS Srl** ensures that the processing of personal data is carried out in compliance with fundamental rights and freedoms, as well as the dignity of the person concerned.

This information is valid for all data collected by **MANET MOBILE SOLUTIONS Srl** through their website.

"Processing" of personal data refers to any process of collection, recording, storage, modification, communication, cancellation and dissemination of personal data.

During their normal operation, the computer systems and software procedures used to operate this website acquire some personal data whose transmission is implicit in the use of internet communication protocols. As a consequence, the mere access to the site implies the acquisition of information and data concerning the user by **MANET MOBILE SOLUTIONS Srl**.

### 1. Identity and contact details of the data controller and Data Protection Officer.

The **data Controller** is Manet Mobile Solutions Srl based in Rome, Via Nemorense no. 91, Tax Code and VAT no. 13464271009, in the person of the legal representative Antonio Calia, (Tax Code CLANTN85T31H5010).

The data controller uses a Data Protection Officer (DPO) to monitor the protection of personal data, designated pursuant to article 37 of the Rules.

We remind you that you can contact the DPO at any time and send any question or request regarding personal data by writing to [dpo@manetmobile.com](mailto:dpo@manetmobile.com).

### 2. Purpose of the processing of personal data

2.1 For all users of the site, their personal data may be used for:

- 2.1.1. allowing browsing of public web pages of our website;
- 2.1.2. responding to requests received through e-mail addresses posted on the website;
- 2.1.3. checking the correct functioning of the site;
- 2.1.4. determining liability for offences committed against the site.

2.2 The personal data of users who fill in the form will be processed only for the purposes described above, as well as for purposes related to the services required and, in particular, for:

- 2.2.1 contacting the user to provide information requested through the contact form;
- 2.2.2 the purposes of direct marketing and on behalf of third-party companies, i.e. promotion and sale of products and services, statistical surveys, market research, carried out through traditional methods (e.g. paper mail, telephone calls with operator) and automated communication tools (e.g. pre-recorded calls, e-mail, fax, SMS, MMS, app), the third-party companies for whom marketing activities will be carried out are the companies that are contractually linked to MMS or even companies belonging to sectors such as publishing, finance, economy, industry, luxury, services, telecommunications and commerce, insurance and non-profit. The provision of data for this purpose is optional and the processing requires the informed, free and express consent of the customer.

2.3 Curriculum vitae submitted by users will only be processed to fulfil the need of getting to know and evaluating candidates for the purposes of selecting staff to fill job positions, as well as to satisfy legal obligations, rules and regulations. Failure to provide such data may make it impossible for the organization to initiate the process of searching for and selecting staff.

The legal basis of the processing referred to in the purposes of point 2.1, pursuant to art. 6 lett. f) of the GDPR, is the legitimate interest of the Data Controller to ensure its site functions correctly and to respond to requests received.

**For processing for the purposes referred to in points 2.2.1 and 2.2.2, the explicit, free and informed consent of the data subject is requested by selecting the appropriate flag.**

For the processing referred to in point 2.3, the legal basis is, pursuant to art. 6 lett. b) of the GDPR, the execution of pre-contractual measures taken on the basis of a request.

### 3. Scope of communication and dissemination of data

The personal data of registered users may be disclosed to third parties specifically designated as data processors by the data controller who belong to the categories such as: lawyers, accountants, website operators.

Every communication and disclosure shall be in accordance with the purposes described above.

The list of data processors can be requested from the data controller at the addresses indicated in point 1.

The personal data may be disclosed to third parties to comply with legal obligations, or to comply with orders from public authorities empowered to do this by law, or to defend a right in the Court of Law.

MMS uses Amazon Web Services EMEA SARL (AWS) servers located in the EU as a provider of external cloud services.

MMS uses the Send Grid platform ([www.sendgrid.com](http://www.sendgrid.com)) with servers located in the United States of America as a service provider for sending emails. This transfer of data takes place through transmission by the Send Grid to the Privacy Shield.

### 4. Period of retention of personal data and methods of processing

The personal data collected for the purposes indicated in point 2.1 of this information notice will not be stored.

Personal data collected for the purposes indicated in point 2.2.1 and 2.2.2 of this information notice will be kept for a maximum period of 24 months or until the revocation of consent and, in any case, no later than three months from the same revocation.

The personal data referred to in point 2.3 of this disclaimer will be kept for 12 months in the event that the candidate is hired.

The processing will be carried out in an automated and/or manual manner, with methods and tools aimed at guaranteeing maximum security and confidentiality, by data controller and data processors in accordance with the EU Regulation.

**The access to browse pages of the website [www.manetmobile.com](http://www.manetmobile.com) and the services offered by the Data controller are reserved for the subjects who can legally, in accordance with the reference national legislation, conclude the contractual obligations. The Data Controller, where it becomes necessary for specific services, to prevent illegitimate access to the website, implements prevention measures to protect its legitimate interest, such as verification using tax code and/or other permitted and appropriate checks.**

## 5. Rights of Data Subject

You have the right to access the data concerning you at any time and to exercise the other rights provided by the GDPR by contacting the persons indicated in point 1. In particular you have the right:

- to obtain confirmation of the existence of your personal data, even if not yet registered, and communication of the same in an intelligible form.
- to obtain the indication: of the origin of personal data; of the purposes and methods of data processing; of the logic applied for treatment carried out with the aid of electronic instruments; of the identification details of the data processors and managers; the entities or categories of entities to whom the personal data may be communicated or who can learn about them as managers or agents of said entities.
- to obtain information about: updating, rectification or, where interested, integration of the data; erasure, anonymisation or blocking of data that has been unlawfully processed, including data whose retention is unnecessary for the purposes for which it was collected or subsequently processed; certification to the effect that the operations as per letters a) and b) have been made known, also concerning their content, to the entities to whom the data was communicated or disclosed, unless this requirement proves impossible or involves a manifestly disproportionate effort compared with the right that is being protected;
- have the right to object, entirely or partly: for legitimate reasons, to the processing of personal data concerning you, even though they may be relevant to the purpose of data collection; to the processing of personal data concerning you for the purpose of sending advertising or direct sales material or for carrying out market research or commercial communication.
- portability of data;
- to withdraw your consent;
- to submit a complaint to the supervisory authority (Privacy Guarantor).

**This information may be subject to changes. If substantial changes are made to the use of data of the user by the Data Processor, the latter will notify the user by publishing them with the maximum evidence on their pages or through alternative or similar means.**