

PRIVACY POLICY
WEB
ISHEO Srl

Information on the Processing of Personal Data pursuant to Art. 13-14 EU Regulation 679/2016

The company ISHEO S.r.l. (hereinafter referred to as “ISHEO”) in its capacity as Data Controller of your personal data, pursuant to Art. 13-14 of EU Reg. 679/2016 (hereinafter referred to as “Regulation” or “GDPR”), and Legislative Decree 196/2003 and subsequent amendments and additions (Italian Privacy Code), hereby informs you that the aforementioned regulations provide for the protection of the parties concerned in the processing of personal data and that such processing will be based on principles of lawfulness, fairness, transparency and general protection of your confidentiality and personal rights. For this purpose, ISHEO provides you with the following information on the processing of your personal data, while browsing our website as a user or business reference contact requesting consulting services to ISHEO.

1. Identity and contact details of the Data Controller

Pursuant to Art. 4 and 24 of the GDPR, the Data Controller is ISHEO S.r.l., in the person of its legal representative, Dr. Integlia, with registered office in Via Pinerolo, 2, 00182 ROME (RM), CF/VAT number 12127201007, Tel. +39 3313867522, Email info@isheo.com

The rights identified below can be exercised by written communication to be sent to our Data Protection Officer Dr. Gjoka by e-mail to the following email address: dpo@isheo.com or by registered letter with return receipt to the registered office address as indicated above.

2. Categories of personal data processed

According to the provisions of Article 14 of the Regulation, since personal data have not been obtained from the party concerned, the categories of data being processed are reported by ISHEO as follows:

- identification data (name, surname, email address, tel., fax, fiscal data, etc.), as well as, in the case of communications or requests sent via the website, any further personal data that may be included in your message or in any other communication sent by you;
- data relating to sending a curriculum vitae;
- data relating to the activity and the performance of the commissioned services (name, surname, date of birth, document, etc.);
- any data needed for the fulfillment of legal obligations (such as, for example, your contact details for communications required by law or by the Authority).

3. Purpose and legal basis for data processing

Your personal data will be processed, in compliance with current regulations, in a correct, lawful and transparent manner for the purposes indicated below and according to the following conditions of lawfulness:

a) Management of your requests and/or communications

- The processing of your personal data will take place in order to correctly and effectively manage your request or communication sent by using the website contact details or by means of the “Contact Form” (Article 6.1.b, GDPR)
- Customer Management.

b) Execution of a contract or management of pre-contractual relationship, including the provision of a service

- The processing of your personal data for this purpose is required for the execution of a contract or for the execution of pre-contractual measures (here meant as a “legal relationship” established between you and the Data Controller following your request) (Art. 6.1.b, GDPR).
- Technical and functional access to the website whose technical cookies remain on the user’s device after the web browser has been closed.

c) Fulfilment of legal obligations (Article 6.1.c GDPR)

In particular, the processing of your personal data is aimed at:

- fulfilment of regulatory obligations relating to administrative-accounting and tax matters
- fulfilment of regulatory obligations in the field of work and health
- fulfilments of regulatory obligations deriving from the contract or from the legal relationships of which you are a party concerned.

d) Marketing purposes

Only with your prior consent your data will be processed for promotional and marketing purposes as well as for statistical information relating the use of services (most visited pages, number of visitors per time or day, geographical location).

4. Data Processing Methods

We inform you that your data will be processed with the support of the following **means/ methods**:

On a mixed basis - electronic and paper means,

- by electronic calculators with the use of software systems managed by third parties
- by electronic calculators with the use of software systems managed directly by the Owner.

For relevant communications we will use the necessary data for remote communications (for example: e-mail account, telephone, text message, etc.). On this

point, ISHEO adopts adequate technical and organizational measures, aimed at effectively implementing the principles of data protection and integrating in the processing the necessary guarantees to meet the requirements of the Regulation and protect the rights of the parties concerned. Moreover, the Data Controller adopts adequate technical and organizational measures to ensure that, by default, only the personal data that are necessary for fulfilling specific processing purposes are processed.

5. Communication and dissemination scope

For the purposes indicated above, your personal data may be disclosed:

- to the persons authorized by the Data Controller to carry out personal data processing operations (employees or parasubordinate collaborators of the Data Controller) in performing their duties;
- to external data processors, identified in writing and to whom specific written instructions have been provided on the data processing (including, for example, IT, technological and telematic service providers);
- to tax authorities, police and judicial and administrative authorities, in compliance with the law, for the detection and prosecution of crimes, prevention and protection from threats to public security, to allow the Data Controller to ascertain, exercise or defend a right in court, as well as for other reasons related to the protection of the rights and freedoms of others;
- to all natural persons and/or legal entities, both public and/or private, when the communication is necessary or functional to the performance of our business and in the manner and for the purposes illustrated above.

No dissemination of your data is envisaged.

6. Mandatory or optional nature of the provision

The provision of your personal data is not mandatory, but any objection might make it impossible for us to provide the services you requested.

7. Data retention period.

We point out that, in compliance with the principles of lawfulness, purpose limitation and data minimization, pursuant to Art. 5 of the GDPR, we keep your personal data for a limited period of time, depending on the purpose of the processing. After this period, your data will be permanently deleted or in any case made irreversibly anonymous.

Your personal data will be stored in compliance with the terms and criteria specified below:

- for the management of your requests for a maximum period of 6 (six) months from the correct and complete management of your request;
- for the fulfillment of legal obligations for a maximum period of 10 (ten) years starting from the end of the calendar year in which the Data Controller has

- fulfilled the legal obligations, in order to document and be able to demonstrate that they have been correctly carried out, in compliance with the law;
- for a period of time not exceeding the achievement of the purpose for which data were collected and processed, for the execution and fulfillment of the contractual purposes and in any case for no longer than 10 years from the termination of the collaboration relationship;
 - for a period of time not exceeding 5 years from the data collection for marketing purposes;
 - and in any case for a period of time not exceeding the achievement of the purpose for which data were collected and processed and in compliance with the mandatory time limits established by law.

Except for the case where retention for a subsequent period is required for any disputes, requests from the competent authorities or in accordance with applicable law.

8. Transfer of personal data to recipients outside the EU/EE.

Your personal data will not be transferred to non-EU third countries or to international organizations.

9. Data collection sources.

- Data that you provide us through our website referred to this Privacy Policy;
- Web surfing data that we collect from our website through “cookies”.

As data subject you have the right to obtain, from the Data Controller access to your personal data, as well as the right to rectification, erasure (“right to be forgotten”, taken into account the actual technical possibilities), restriction of processing, updating, data portability and objection to processing of personal data concerning you at any time. Moreover, you can exercise all the rights deriving from Articles 15, 16, 17, 18, 19, 20, 21 and 22 of the GDPR.

10. Rights of the data subject pursuant to Art. 15, 16, 17, 18, 19, 20, 21 and 22 of EU Regulation 679/2016.

- a) The data subject has the right to obtain from the Data Controller confirmation as to whether or not personal data concerning him/her are being processed, even if they have not been recorded yet, and their communication in an intelligible form, as well as the right to lodge a complaint to the supervisory authority.
- b) The data subject has the right to obtain indication:
 - of the origin of the personal data;
 - of the purposes and methods of processing;
 - of the logic applied in case of treatment carried out with the aid of electronic instruments;
 - of the identification details of the Data Controller, of the data processors and of the designated representatives pursuant to Article 5, Paragraph 2;

- of the subjects or categories of subjects to whom the personal data may be disclosed or who may become aware of them as appointed representative in the State territory, as well as managers or authorized persons.
- c) The data subject has the right to obtain:
- c.1) updating, rectification or, when required, integration of his/her personal data.
 - c.2) erasure, transformation into anonymous form or blocking of data processed unlawfully, including data whose retention is unnecessary for the purposes for which the data were collected or subsequently processed;
 - the attestation certifying that the operations referred to in letters c.1) and c.2) have been brought to the attention, also as regards their content, of those to whom the data have been communicated or disseminated, except for the case where this fulfillment proves to be impossible or implies the use of means manifestly disproportionate to the protected rights.
- d) The data subject has the right to object in whole or in part:
- on legitimate grounds, to processing of personal data concerning him/her, even though they are relevant to the purpose of their collection;
 - the processing of personal data concerning him/her for the purpose of sending advertising or direct sales material or for carrying out market research or commercial communication.

Moreover, the data subject has the right to lodge a complaint with the competent supervisory authority in the State of his/her habitual residence, place of work or State where the alleged data protection infringement occurred.

11. Processing of data for purposes other than that for which they were collected

If the Data Controller intends to further process the personal data for purposes other than that for which they were collected, prior to further processing, ISHEO shall provide the data subject with information relating the other purposes and with any relevant further information as referred to in Art. 13, Paragraph 2 of the GDPR.

12. Cookie management

A “cookie” is a text file that is stored on the user’s device when accessing a website with the aim of gathering and conveying information every time the user visits the website. It is a sort of reminder of the Internet page that has been visited. Through cookies, the web server sends information to the user’s browser (Internet Explorer, Mozilla, Google Chrome, Firefox, etc.), stored on the user’s device, which will be re-read and updated every time the user returns to the website. This way the website can automatically adapt itself to the user’s need and preferences.

While browsing the website, the user may also receive on his/her device cookies from different websites, the so-called “third-party cookies”, set directly by the website managers and used for purposes and in the manner defined by them.

Depending on their duration, they are divided into session cookies or temporary cookies – that are automatically deleted from the user’s device at the end of the browsing session by closing the browser – and persistent cookies or cookies stored on the device until their expiration or cancellation by the user.

Based on the function and purpose of use, cookies can be divided into technical cookies and profiling cookies.

1- Technical cookies

Some cookies are used for electronic authentication, monitoring of sessions and storage of specific information regarding user’s activities when accessing a web page. These cookies are known as technical cookies and are often useful to allow users to browse a website and to use all its functionalities. Technical cookies are cookies whose use does not require the user’s consent. Analytical cookies also belong to this category. These cookies collect information about how users access a website and allow improving its functioning. For example, analytical cookies show which pages are most frequently visited, allow web developers to study the recurring patterns of use of a website and help them understand any difficulties users are experiencing in browsing the website.

2- Profiling cookies

Profiling cookies are used to monitor and profile users while browsing, record their web browsing activities or consumption habits (what they buy, what they read, etc.), also for advertising purposes aimed at targeted and customized services. The use of these cookies requires the prior acquisition of the user’s free informed consent, pursuant to Art. 7 of EU Regulation 679/2016 and to the national legislation in force.

3- Third party cookies

It may happen that a web page includes cookies from other websites contained in various elements hosted on the page itself, such as advertising banners, images, videos, maps or specific links to web pages of other domains residing on servers other than the one on which the requested web page is located. In other words, these cookies are set directly by the website managers or by servers other than this website.

In these cases, we are talking about the so-called third-party cookies, which are usually used for profiling purposes. The use of these cookies requires the prior acquisition of the user’s free and informed consent.

4- Types of cookies used in our website.

We remind you that, proceeding with the browsing of this website, or closing the cookie information banner, by clicking on the “Accept all” and X buttons (top right), implies the persistence of the default settings and therefore the browsing in the absence of cookies or other tracking tools other than technical cookies.

There are two types of cookies: “session cookies” and “persistent cookies”.

As defined above, “session cookies” are temporary cookies that remain on the device until you leave the website; “persistent cookies” remain on your device for much longer or until they are manually deleted.

The main functions of the cookies installed by www.isheoline.com are technical, used to constantly improve its services, and for authentication and statistical purposes, such as counting the number of website visitors. Without technical cookies, which are strictly necessary, a website could not provide any service and would not be as smooth and easy as it should be. The use of cookies is therefore strictly aimed at facilitating the server functions while browsing the website. Below you can find the list of the specific cookies we use.

• ***Technical cookies***

This website is built on the WordPress and, therefore, it uses the cookies implemented by the aforementioned platform and others.

The cookies used are the following:

<i>Name</i>	<i>Duration</i>	<i>First or Third Party</i>	<i>Third Party Links</i>
Jsessionid,	Web Session	Third Party	Internal WordPress Cookies
cookielawinfo-checkbox-advertisemen	1 year	Third Party	https://www.cookielawinfo.com/privacy-cookies-policy/
cookielawinfo-checkbox-others	11 months	Third Party	https://www.cookielawinfo.com/privacy-cookies-policy/
cookielawinfo-checkbox-analytics	11 months	Third Party	https://www.cookielawinfo.com/privacy-cookies-policy/
cookielawinfo-checkbox-performace	11 months	Third Party	https://www.cookielawinfo.com/privacy-cookies-policy/
cookielawinfo-checkbox-funcional	11 months	Third Party	https://www.cookielawinfo.com/privacy-cookies-policy/
cookielawinfo-checkbox- necessary	11 months	Third Party	https://www.cookielawinfo.com/privacy-cookies-policy/
Viewed_cookie_policy	11 months	Third Party	https://www.cookielawinfo.com/privacy-cookies-policy/

• ***Profiling cookies and other cookies***

<i>Name</i>	<i>Duration</i>	<i>First or Third Party</i>	<i>Third Party Links</i>
yt-remote-connected-device	Web Session	Third Party	https://policies.google.com/technologies/cookies?hl=it
yt-remote-device-id	Web Session	Third Party	https://policies.google.com/technologies/cookies?hl=it
VISITOR_INFO_LIVE	5 months and 27 days	Third Party	https://policies.google.com/technologies/cookies?hl=it
YSC	Web Session	Third Party	https://policies.google.com/technologies/cookies?hl=it
time_zone	Web Session	Third Party	internal cookie of the wordpress platform
webinargeek	Web Session	Third Party	https://www.webinargeek.com/cookies
		Third Party	https://policies.google.com/technologies/cookies?hl=it
		Third Party	https://policies.google.com/technologies/cookies?hl=it

• ***Google Analytics cookies with IP anonymization***

Our web pages use Google Analytics third-party cookies with IP anonymization (service offered by Google, Inc), to allow us to collect data anonymously, to examine the behavior of visitors while browsing the website, and to improve the website usability and user experience. They are defined as anonymous as they cannot be used to identify specific individuals. Google Analytics differentiates between new or returning visitors, based on the way the web pages are browsed (entry and exit links, movements between pages, time, geographical location, etc.)

For more information on Google Analytics, please click on the following links:

<https://www.google.it/policies/privacy/partners/>

<https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>.

It is possible to disable selectively Google Analytics cookies by installing the opt-out add-on provided by Google itself. For information, please visit the following page:

<https://tools.google.com/dlpage/gaoptout>

The cookies used by Google Analytics are:

<i>Name</i>	<i>Duration</i>	<i>First or Third Party</i>
Consent	2 years	<i>Third Party</i>
_ga	2 years	<i>Third Party</i>
_gid	1 day	<i>Third Party</i>
_gat_gtag_UA_38133518_41	1 minute	<i>Third Party</i>

We remind you that, if you do not accept cookies or disable them, this could affect your user experience while browsing our website.

5- Cookie Management

You can manage your own preferences relating to cookies by modifying your Internet browser settings and using the features that allow to delete, disable and block cookies (all or some), or limit them to specific websites.

Therefore, you can disable cookies by following the deactivation procedure provided by your browser. Please find below the procedures proposed by the main Internet browsers: [Microsoft Windows Explorer](#), [Mozilla Firefox](#), [Google Chrome](#), [Apple Safari](#), Google Analytics, by downloading a specific browser plug-in.

To get information on the cookies stored on your device and disable them individually, please go to the following link: <http://www.youronlinechoices.com/it/le-tue-scelte>.

13. Privacy Policy Amendments

The evolving nature of our activities and possible regulatory interventions on the subject may require changes in the procedures for processing of your personal data described so far. This Privacy Policy may therefore undergo amendments and additions over time.

The updated version of this Privacy Policy will be published on this web page with the indication of the date of its last update. We therefore invite you to consult this page when accessing the website.

Last updated February 15, 2022