

PRIVACY POLICY ON THE PROCESSING OF PERSONAL DATA

SEIM S.r.l. (hereinafter, for the sake of brevity, "SEIM", or the "Company") informs you that the personal data acquired when you browse will be processed in compliance with the law on the protection of personal data and according to the methods indicated in this privacy policy (provided pursuant to art. 13 EU Regulation no. 679/2016 – so called GDPR):

1. Data Controller

SEIM S.r.l., P.IVA n. 02311450155, with registered office in Via Alessandro Volta n. 17 – 20090 Cusago (MI), is the Data Controller of the personal data of users who browse this site.

The Company can be contacted at the e-mail address privacy@seim.it

2. Types of Data collected

By filling the contact forms on the site, the Data Subject voluntarily sends the following personal data:

- name and surname,
- e-mail address;
- any additional data contained in the subject and in the message submitted by the Data Subject.

The Data Subject is invited not to provide personal data revealing his/her racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as genetic data, biometric data, data concerning health or sex life or sexual orientation (i.e. "sensitive data"). Such data will be deleted immediately in the absence of an explicit declaration of consent to its processing by the Data Subject.

3. Purpose and legal basis of the processing

Data collected and processed by SEIM will be processed for the following purposes:

- to respond to the request or communication sent by the Data Subject through the contact form.** The legal basis for this purpose is set out in art. 6 par. 1, lett. b), GDPR, i.e. to provide the user with the requested service;
- comply with legal obligations, regulations or requests from judicial authorities.** The legal basis for this purpose is set out in art. 6 par. 1, letter c), GDPR, i.e. the processing is necessary for compliance with a legal obligation to which the Data Controller is subject;
- to assert or defend in court a right of SEIM.** The legal basis for this purpose is set out in art. 6 par. 1, lett. f), GDPR, i.e. the processing is necessary to establish, exercise or defend a right of the Company in court.

4. Data retention period

The personal data collected and processed through the contact form will be stored for the time necessary to reply to the request or, in any case, to get in touch with the Data Subject. The data will then be deleted within a maximum period of 60 days from the end of this activity, with the exception of those necessary for compliance with tax, accounting and administrative regulations or to comply with other legal obligations and to document the activities carried out.

5. Processing methods

The personal data collected will be processed, stored and analysed with electronic tools and will be stored both on computer and paper supports, organized in databases, and on any other type of suitable support.

Specific security measures are implemented to prevent the loss, illegal or unfair use of the data, or unauthorised access to data.

The processing of personal data carried out by SEIM does not involve automated decision-making processes.

6. Disclosure of personal data

The disclosure of personal data submitted through the contact form by the Data Subject is a necessary requirement for the provision of the requested service (i.e. contacting the Company and receiving feedback) and therefore, it is the Data Subject's obligation to provide such data.

Failure to provide such personal data will make it impossible for SEIM to receive communications through the contact form of this site and therefore to establish contacts with the Data Subject.

7. Subjects to whom personal data may be communicated

The personal data collected will not be disclosed indiscriminately and may be communicated to:

- authorized personnel within the Data Controller,
- subjects who have the right and interest to access your personal data by provision of law or secondary and/or EU regulations,
- companies, associations or professional firms that provide services and activities on behalf of the Data Controller, as Data Processor, in particular for the supply of ICT services (e.g. web hosting services, cloud providers, etc.), for the fulfilment of legal obligations, as well as for any organisational and administrative need necessary for the activities carried out by the Data Controller.

The names of the subjects who may become aware of your personal data in their capacity as "Data Processors" are shown in an updated list available at SEIM (to be requested at the addresses indicated in point 1).

8. Transfer of data outside the European Economic Area or to international organisations

Within the scope of the processing operations described in this policy, SEIM does not transfer personal data outside the European Economic Area or to international organizations.

9. Data Subject's rights

In relation to the processing of data regulated by this policy, the Data Subject has the right to exercise at any time the rights provided for by EU Regulation no. 679/2016 (GDPR).

- **Right to be informed** of any processing of your personal data. The Data Subject has the right to obtain confirmation as to whether or not his or her personal data is being processed and, if so, must be informed about any aspect relating to the processing operations, including, for example, information about:
 - the Data Processors and any other recipient of the data (to whom your personal data may be disclosed),
 - the purposes and legal basis of processing,
 - the types of data processed and their respective retention period,
 - the transfer of personal data to third countries or international organisations.
- **Right of access** to your personal data, as well as the right to rectification of inaccurate data and the right to have incomplete data completed.
- **Right to erasure** (so-called *right to be forgotten*) under the conditions established by art. 17 GDPR, for example, when your personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed.
- **Right to restriction of processing** for the purposes and/or methods for which your personal data were collected, under the conditions set out in Article 18 GDPR.
- **Right to data portability**, i.e. the right to receive a copy of all personal data that you have provided to the Data Controller or to have your personal data transmitted directly from one Controller to another.
- **Right to withdraw consent**, when expressed to legitimize the processing of your personal data. This right may be exercised at any time, without prejudice to the lawfulness of the processing based on consent given before its withdrawal.
- **Right to lodge a complaint** with a Supervisory Authority, should you believe that the processing of your personal data violates the regulations in force. In such a case, you will have to contact the Supervisory Authority of the Member State of your habitual residence, place of work or place of the alleged infringement. The contact details of the Italian Supervisory Authority (Garante per la Protezione dei Dati Personali) can be found on the [Its website](#).



In addition, **the Data Subject has the right to object** to the processing of his or her personal data when the processing:

- is necessary for the performance of a task carried out in the public interest,
- it is necessary for the pursuit of a legitimate interest of the Data Controller,
- it has direct marketing purposes, including profiling.

To exercise the rights listed above, the Data Subject may send a request by email to privacy@seim.it
The Company will respond to such requests within a maximum period of 30 days.