

Privacy Policy

pursuant to art. 13 Regulation EU 2016/679

Dear Data Subject,

With this document (the "Policy"), we wish to renew our commitment to ensuring that the processing of personal data collected through the website <https://beije.it> (the "Site"), carried out using both automated and manual methods, is carried out in full compliance with the protections and rights recognised by Regulation EU 2016/679 ("GDPR" or the "Regulation") and other applicable rules on the protection of personal data.

The term personal data refers to the definition contained in Article 4(1) of the Regulation, i.e. *"any information relating to an identified or identifiable natural person; an identifiable person is one who can be identified, directly or indirectly, by reference in particular to an identifier such as a name, an identification number, location data, an online identifier or to one or more features of his or her physical, physiological, genetic, mental, economic, cultural or social identity"* (the "Personal Data").

This Privacy Policy - drafted on the basis of the principle of transparency and including all the elements required by art. 13 of the Regulation - aims to provide you, in a simple and intuitive way, with all the useful and necessary information so that you can provide your Personal Data in a conscious and informed manner and, at any time, exercise your rights under the GDPR.

THE DATA CONTROLLER

The company that will process your Personal Data for the purposes set out in this Policy and that, therefore, will play the role of data controller, i.e. *"the natural or legal person, public authority, service or other body that, individually or jointly with others, determines the purposes and means of the processing of personal data"* is People First S.r.l., with registered office in Viale Giulio Cesare n. 71, 00192 - Rome, VAT No.:16334941008 (the "Data Controller").

DATA PROTECTION OFFICER

The Data Controller, in order to facilitate relations with data subjects, has appointed a Data Protection Officer (the "DPO"), identifying SAPG Legal Tech S.r.l. with registered office in Via Durini n. 15, 20122 - Milan (MI).

As provided for by art. 38 of the GDPR, you may freely contact the DPO for all matters relating to the processing of your Personal Data and/or should you wish to exercise your rights as provided for in this Policy, by sending a written communication to the e-mail address: dpo.privact@sapglegal.com.

PURPOSES AND LEGAL BASIS OF PROCESSING

While browsing the Site, some of your Personal Data may be collected in the following ways.

– *Navigation Data*

The computer systems and software procedures used to operate the Site acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols.

This category of data includes, by way of example: IP addresses, the type of browser used, the operating system, the domain name and addresses of websites accessed or exited from, information on the pages visited by users within the Site, access time, the length of time spent on each page, internal path analysis and other parameters relating to the user's operating system and computer environment.

Such technical/informatics data are collected and used exclusively in an aggregate and non-identifying manner and could be used to ascertain responsibility in the event of hypothetical computer crimes to the detriment of the Site.

The processing will be legally based on the legitimate interest of the Data Controller to improve the functioning of its systems, to optimise and improve the browsing experience, to avoid fraudulent activities and to improve the security of the Site (art. 6, paragraph 1, letter f) of the Regulations).

– *Data provided voluntarily by the visitor*

This refers to all those Personal Data that the visitor freely releases on the Site, for example, to register and/or access a reserved area, download free resources, request information on a specific product or service through a form, subscribe to the newsletter service, write to an e-mail address or call a telephone number displayed on the Site to have direct contact with the company (in order, for example, to request assistance or further information on a product/service of the Data controller). Such processing shall be lawful pursuant to art. 6, paragraph 1, letter b) of the Regulation (performance of a contract or of pre-contractual measures adopted at the request of the data subject) as well as for the fulfilment of any legal obligations.

In order to allow the Data Controller to carry out the processing activities for such purposes, it will be necessary to provide the Personal Data requested in the appropriate forms. If you fail to fill in even just one of the fields marked as mandatory, it may not be possible to process your Personal Data and, consequently, to provide you with the information and services requested.

We do not process Personal Data relating to your health and, in general, "special" categories of personal data pursuant to art. 9 of the Regulation.

In addition to the above, your Personal Data may be processed by the Controller for the following and additional purposes.

- **Direct Marketing** - This term refers to the carrying out of promotional activities (using both automated and traditional methods) for products and/or services of interest to you that are sold and/or provided by the Data Controller. With regard to this direct marketing purpose, it should be noted that, by virtue of Article 6(1)(f) of the Regulation and Article 130(4) of the Privacy Code (so-called soft spam exception), the Data Controller may carry out this activity based on its legitimate interest, regardless of your explicit consent, as explained in greater detail in Recital 47 of the Regulation which states that "*it is considered to be in the legitimate interest*

of the controller to process personal data for direct marketing purposes". This will be possible as a result of the assessments made by the Controller regarding the possible and possible prevalence of your interests, rights and fundamental freedoms requiring the protection of Personal Data over its own legitimate interest in sending direct marketing communications. Moreover, you may lawfully object at any time (even partially) to receiving promotional communications, without this affecting in any way the processing for other purposes.

SUBJECTS TO WHOM YOUR PERSONAL DATA MAY BE COMMUNICATED

Your Personal Data may be managed, on behalf of the Data Controller, exclusively by staff expressly authorised to process it (pursuant to article 29 GDPR) and by third parties expressly appointed as data processors (pursuant to article 28 GDPR), in order to correctly carry out all processing activities necessary to pursue the purposes set out in this Policy.

Where required by law or in order to prevent or suppress the commission of a crime, your Personal Data may also be disclosed to public bodies or judicial authorities.

RETENTION PERIOD OF PERSONAL DATA

In compliance with the principle of limitation of the storage period (art. 5.1 letter e) of the Regulation), your Personal Data will be processed by the Controller only for the time necessary to achieve the purposes set out in this Policy.

In particular, your Personal Data will be processed for a period of time equal to the minimum necessary, as indicated by recital 39 of the Regulation, that is until the termination of the existing relationship between you and the Controller, as well as for an additional storage period that may be imposed by law (as also provided by recital 65 of the Regulation).

In any case, your Personal Data will be periodically checked, for a period not exceeding 12 months, in order to assess their relevance to the Controller's activities; if your Personal Data are no longer relevant, they will be deleted.

LINKS TO/FROM THIRD PARTY SITES

From the Site it may be possible to connect via links to other third-party websites, including Facebook and LinkedIn.

In this regard, the Data controller cannot be held responsible for the possible management of Personal Data by third party websites and for the management of authentication credentials provided by third parties.

RIGHTS OF THE DATA SUBJECTS AND METHODS OF EXERCISE

You may at any time exercise your rights under Articles 15 et seq. of the Regulation against the Data Controller. In particular, you have the right to obtain

- confirmation as to whether or not your Personal Data is being processed and to obtain access to the data and to the following information: purpose of processing, categories of Personal Data, recipients and/or categories of recipients to whom the data has been and/or will be communicated as well as the relevant storage period;
- the rectification of your Personal Data that is inaccurate and/or the integration of your Personal Data that is incomplete, including by providing a supplementary declaration;
- the erasure of your Personal Data and the limitation of its processing in the cases provided for by the GDPR and by the privacy law in force;
- where applicable, the portability of your Personal Data and, in particular, the possibility to request the direct transmission of your Personal Data to another data controller;
- to object at any time, for reasons related to your particular situation, to the processing of your Personal Data in full compliance with applicable privacy laws.

To exercise your rights, you may contact the Data Controller at the following e-mail address, attaching a copy of your identity document: job@beije.it.

In any case, if you believe that the processing of your Personal Data is contrary to the Privacy Regulations, you will always have the right to lodge a complaint with the competent supervisory authority (Garante per la Protezione dei Dati Personali) pursuant to art. 77 GDPR.

PROCESSING LOCATIONS

Your Personal Data will be processed within the territory of the Italian Republic.

Should your Personal Data be (for technical and/or operational reasons) transferred and/or located in countries outside the territory of the European Union, we hereby inform you that the subjects located outside the European Union will be appointed (if applicable) as Data Processors pursuant to art. 28 of the GDPR. Moreover, the transfer of your Personal Data to such entities, limited to the performance of specific processing activities, will be regulated in accordance with the provisions of Chapter V of the GDPR.

Therefore, all necessary precautions will be taken in order to ensure the most complete protection of your Personal Data by basing such transfer: a) on adequacy decisions of the receiving third countries expressed by the European Commission; b) on adequate safeguards expressed by the receiving third party pursuant to article 46 of the Regulation; c) on the adoption of binding corporate rules; d) by adopting standard contractual clauses approved by the European Commission.

In any case, you may request further details from the Controller if your Personal Data has been processed outside the European Union by requesting evidence of the specific safeguards adopted.