
 Company of 	Quality Management System of Ali S.p.A.	TYPE OF DOCUMENT	
	PRIVACY INFORMATION FEA	TEMPLATE	
		CODE	REVIEW
		MO 67_en	01 of 12.01.2023

## FEA (Advanced Electronic Signature)

### PRIVACY INFORMATION pursuant to articles 13 and 14 of Regulation (EU) 2016/679

With this document (the "Information"), the Data Controller, as defined below, wishes to inform you of the methods according to which ALI S.p.A. collects, uses and stores your personal data for the purpose of activation and subsequent use of the Advanced Electronic Signature Service, made available by the Data Controller with the aim of signing documents or documents by you, also where appropriate on behalf of the company or third party represented by you; Service also consisting of the conservation, by law, of the same acts or documents.

Pursuant to art. 13 GDPR, in relation to the processing of your personal data carried out for the OTP Advanced Electronic Signature Service ("FEA"), provided for by ALI Agenzia per il Lavoro S.p.A., with the support of OPTIMO NEXT S.r.l., we inform you, therefore, of the following:

#### 1. SUBJECTS OF DATA PROCESSING

The controller is ALI Agenzia per il Lavoro S.p.A., with registered office in Via Nazionale, 172, 00184, Rome (the "Controller"). For the Advanced Electronic Signature Service in OTP mode referred to in this Information, the external processor pursuant to the GDPR, appointed by the Controller, is OPTIMO NEXT S.r.l., with registered office in Viale Thomas Alva Edison 110 - 20099 Sesto S. Giovanni (MI), tax code and VAT number 08989870962, in the person of its legal representative.

The Controller has appointed a Data Protection Officer ("Data Protection Officer" or "DPO"), whom you can contact to exercise your rights listed in point 6 below, as well as to receive any information, by writing to: [privacy@magistergroup.it](mailto:privacy@magistergroup.it).

#### 2. WHAT PERSONAL DATA WE PROCESS

The Controller may process the following personal data according to the conditions of lawfulness provided pursuant to art. 6 GDPR:

- personal and identification data (e.g. name, surname, tax code) provided directly by the user for himself or, where appropriate, on behalf of the company or third party by the first represented, for the performance of the Service referred to in the introduction, also through valid identification documents;

- contact details (address of residence and domicile, e-mail address, telephone number);

- any other information necessary for the activation and execution of the Service or for activities ancillary or functional to it.

The activation of the FEA Service involves the processing of personal data identifying the signatory in accordance with the provisions of current Italian and European legislation. In particular, the processing is carried out for the identification, activation, management of the Service and the fulfillment of the same in force legislation.

#### 3. PURPOSE OF THE PROCESSING

The personal data provided will be processed in compliance with the conditions of lawfulness pursuant to art. 6 GDPR for the following purposes:

- acquisition of prior information necessary for the activation and/or management of the Service;

- account creation;

- monitoring of the Service provided;

- execution of the Service or activities ancillary or functional to it;

- fulfilment of contractual obligations, of law and administrative-accounting purposes, protection in case of litigation.



For the purposes of the application of the provisions on the protection of personal data, the processing operations carried out for administrative and accounting purposes are those related to the performance of organizational, administrative, financial and accounting activities, regardless of the nature of the data processed. In particular, these purposes are pursued by internal organizational activities, those functional to the fulfillment of contractual and pre-contractual obligations, information activities.

The legal basis for the processing is the execution of the FEA Service provided by the Data Controller with the support of Optimo Next.

The nature of data provision is mandatory. The refusal to provide data or consent to the processing will make it impossible to carry out the activity, resulting in the impossibility of providing all the services related to it.

#### 4. TO WHOM YOUR PERSONAL DATA MAY BE COMMUNICATED AND WHO MAY BECOME AWARE OF IT

The personal data provided may be communicated to recipients, appointed pursuant to art. 28 of the GDPR, that will process the data as managers and/ or as natural persons acting under the authority of the Controller and the Processor, in order to comply with contracts or related purposes.

 <i>Company of</i> 	<b>Quality Management System of Ali S.p.A.</b>	<b>TYPE OF DOCUMENT</b>	
		<b>TEMPLATE</b>	
	<b>PRIVACY INFORMATION FEA</b>	<b>CODE</b>	<b>REVIEW</b>
		<b>MO 67_en</b>	<b>01 of 12.01.2023</b>

For the pursuit of the purposes described, the Data will be known by the employees, the assimilated staff, the collaborators of the Data Controller, and the Data Controller, who will operate as data processors.  
The Data may be transmitted to the Data Controller's suppliers, as external Data Processors, in full compliance with current regulations.

The Data may also be transmitted to subjects, public and/or private, who collaborate with the Controller for services necessary, functional or in any way related to the purposes and/or to which the communication is due by law.  
The personal data provided will be managed and stored in countries within the European Union.

## 5. METHOD OF PROCESSING YOUR PERSONAL DATA AND CONSERVATION PERIOD

The processing will be carried out in an automated and/ or manual form, with methods and tools aimed at ensuring maximum security and confidentiality, by subjects of this specially appointed. In compliance with the provisions of art. 5 paragraph 1 letter. e) GDPR the personal data collected will be stored in a form that allows the identification of data subjects, and in any case in a pseudo-anonymized manner, for a period of time not exceeding the achievement of the purposes for which the personal data are processed, or for the management of the FEA Service, in compliance with current legislation, which currently sets a minimum storage time of 20 years.

## 6. WHAT RIGHTS YOU HAVE AS DATA SUBJECT

In relation to the processing described in this Policy, as a data subject you may, under the conditions provided for by the GDPR, exercise the rights enshrined in articles 15 to 21 and 77 of the GDPR and, in particular, the following rights:

- **right of access** - Article 15 GDPR: right to obtain confirmation that personal data concerning you are being processed or not and, in this case, to obtain access to your personal data - including a copy thereof - and communication, among others, of the following information:

- purpose of processing
- categories of personal data processed
- recipients to whom these have been or will be communicate
- data retention period or the criteria used
- data subject's rights (rectification, erasure of personal data, restriction of processing and right to object to processing)
- right to propose a complaint
- right to receive information on the origin of my personal data if it has not been collected from the data subject
- the existence of automated decision-making, including profiling;

- **right of rectification** - article 16 GDPR: right to obtain, without undue delay, the rectification of inaccurate personal data concerning you and/or the integration of incomplete personal data;



- **right to erasure** (right to be forgotten) - article 17 GDPR: right to obtain, without undue delay, the erasure of personal data concerning you, when:

- the data are no longer necessary for the purposes for which they were collected or otherwise processed;
- You have withdrawn your consent and there is no other legal basis for processing;
- You have successfully opposed the processing of personal data;
- the data were processed unlawfully;
- the data must be deleted in order to fulfil a legal obligation;
- the personal data has been collected in relation to the provision of information society services referred to in Article 8.1 GDPR.

The right to erasure shall not apply insofar as the processing is necessary for the fulfilment of a legal obligation or for the performance of a task performed in the public interest or for the establishment, exercise or defence of a right in court:

- **right to limitation of processing** - article 18 GDPR: right to obtain limitation of processing, when:

- the data subject disputes the accuracy of the personal data;
- the processing is unlawful and the data subject opposes the deletion of the personal data and instead requests that its use be restricted;
- the personal data are necessary for the data subject to establish, exercise or defend legal claims;
- the data subject has opposed the processing pending the verification of the possible prevalence of the legitimate reasons of the data controller compared to those of the data subject;

 <i>Company of</i> 	<b>Quality Management System of Ali S.p.A.</b>	<b>TYPE OF DOCUMENT</b>	
		<b>TEMPLATE</b>	
	<b>PRIVACY INFORMATION FEA</b>	<b>CODE</b>	<b>REVIEW</b>
		<b>MO 67_en</b>	<b>01 of 12.01.2023</b>

- **right to data portability** - article 20 GDPR: right to receive, in a structured format, commonly used and readable by an automatic device, the personal data concerning you provided to the Controller and the right to transmit them to another holder without hindrance, if the processing is based on consent and is carried out by automated means. In addition, the right to obtain that your personal data are transmitted directly by the Controller to another data controller if this is technically feasible;
- **right to object** - Article 21 GDPR: right to object, at any time, to the processing of personal data concerning you based on the condition of legitimacy of the legitimate interest, including profiling, unless there are legitimate reasons for the Data Controller to continue processing that outweigh the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of a right in court;
- **right to withdraw** consent at any time;
- **the right to lodge a complaint with** the Italian Data Protection Authority, Piazza Venezia, 11, 00187, Rome (RM).

The above rights may be exercised, vis-à-vis the Controller, by contacting the references indicated in preceding point 1. The Controller will take charge of your request and provide notice, without undue delay and at the latest within one month of receipt of the request, of the information on the action taken with regard to your request.

The exercise of your rights as a data subject is free of charge in accordance with Article 12 GDPR. However, in the case of manifestly unfounded or excessive requests, also due to their repetitiveness, the Controller may charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested, or refuse to act on the request.

Finally, we inform you that the Controller may request further information necessary to confirm the identity of the data subject.