

Privacy notice for www.svsoftware.it

Articles 13-14 of EU Regulation 2016/679

This notice is a general obligation that must be fulfilled before, or at the latest when, the direct collection of personal data begins. Where personal data are not collected directly from the data subject, the notice must be provided within a reasonable period or when the data are communicated (not when they are recorded) to third parties or to the data subject. Pursuant to the General Data Protection Regulation concerning natural persons (GDPR - Regulation (EU) 2016/679), the undersigned organisation, acting as data controller, provides the following information.

SOURCES AND CATEGORIES OF PERSONAL DATA

The personal data held by the undersigned organisation are collected directly from the data subjects. This website does not collect sensitive data, meaning data capable of revealing racial or ethnic origin, religious, philosophical or other beliefs, political opinions, membership of trade unions, associations or organisations of a religious, philosophical, political or trade-union nature, health status or sex life.

BROWSING DATA

During normal operation, the IT systems and software procedures used to operate this website acquire certain personal data whose transmission is implicit in the use of Internet communication protocols. This information is not collected in order to be associated with identified data subjects, but by its very nature could, through processing and association with data held by third parties, allow users to be identified. This category includes the IP addresses or domain names of the computers used by users connecting to the website, the URI (Uniform Resource Identifier) addresses of the requested resources, the time of the request, the method used to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server response (successful, error, etc.) and other parameters relating to the user's operating system and IT environment.

These data are used solely to obtain anonymous statistical information about use of the website and to check that it is operating correctly, and are deleted immediately after processing. The data could be used to establish responsibility in the event of hypothetical computer crimes against the website.

PROFILING DATA

No profiling data concerning the data subject's habits or consumer choices are acquired directly. However, links or embedded third-party elements may allow independent or separate parties to acquire such information. See the section on third-party cookies.

COOKIES

Like other websites, this website stores cookies in the browser used by the data subject in order to transmit personal information and improve the user experience. Cookies are small text strings that websites visited by the user send to the user's device (usually the browser), where they are stored, sometimes with long-term persistence, and then sent back to the same websites on the next visit.

As explained below, users can choose whether and which cookies to accept, bearing in mind that refusing them may affect the ability to carry out certain transactions on the website, the accuracy and suitability of some personalised content, or the ability to recognise the user from one visit to the next. If no choice is made, the default settings will apply and all cookies will be enabled; users may nevertheless communicate or change their decisions at any time.

TECHNICAL COOKIES

In particular, so-called session cookies are used. They are not stored permanently on the user's computer and disappear when the browser is closed. Their use is strictly limited to the transmission of session identifiers (random numbers generated by the server) needed to allow secure and efficient browsing of the website. They avoid the use of other IT techniques that could potentially compromise the confidentiality of users' browsing and do not allow the acquisition of personal identification data concerning the user.

Analytics cookies are also used to help understand how visitors interact with website content by collecting information (geographical and web origin, technology used, language, entry, visited and exit pages, time spent, etc.) and producing website usage statistics without personally identifying individual visitors. All these cookies are considered technical cookies for which consent is not required and an opt-out mechanism applies. Technical cookies are not disclosed to third parties because they are necessary or useful for operation of the website; they are therefore processed only by persons acting as authorised personnel, data processors or system administrators.

THIRD-PARTY COOKIES

Finally, the website embeds cookies and other third-party elements (tags, pixels, etc.). These parties are independent and the Data Controller is not responsible for them. They may also carry out profiling activities; please refer to their respective websites:

- Google (widget)

DATA PROVIDED VOLUNTARILY BY THE USER

The optional, explicit and voluntary sending of email to the addresses shown on the website entails the subsequent acquisition of the sender's address, which is necessary to reply to requests, as well as any other personal data included in the email. The explicit and voluntary submission of forms available on the website containing the data subject's information also entails processing in order to follow up pre-contractual obligations or perform the services requested through the forms.

The information contained in the forms may include personal and contact details, addresses, telephone numbers and email addresses of data subjects and of identified or identifiable third parties connected with the website user. In any event, specific summary notices will progressively be displayed on website pages provided for particular services requested by the user.

PURPOSES AND LEGAL BASES OF PROCESSING

Personal data are used (reference: Article 6(b) GDPR):

- a) to allow browsing of the website;
- b) where applicable, to perform the service requested as part of the ordinary activities carried out by the undersigned organisation;
- c) ATECO code 62.01 - Training, design and development in the field of business IT applications, related technical support, and data processing on behalf of third parties.

In addition, all personal data may be processed:

- d) for purposes connected with obligations imposed by law and provisions issued by authorities authorised by law (reference: Articles 6(c) and 9(b), (g), (h) GDPR);
- e) to establish, exercise or defend a legal claim in judicial or out-of-court proceedings (legitimate interest) of the undersigned organisation (reference: Articles 6(f) and 9(f) GDPR);
- f) for direct marketing purposes according to the legitimate interest of the Data Controller, in particular: advertising identifiers used to display advertisements in relation to cookies; email addresses used to send the newsletter; browsing and usage logs used to protect the website and service against cyber-attacks. In these cases the data subject may always refuse consent, and the Data Controller will refrain from processing (reference: Article 6(f) GDPR);
- g) for purposes supporting the activities for which the data subject may choose whether or not to provide consent, such as subscribing to the newsletter to receive information and promotional messages for the sale of products and services, measuring satisfaction, and communicating data to third parties in order to receive information, promotional and marketing communications (Article 6(a) GDPR).

CONSEQUENCES OF REFUSING TO PROVIDE DATA

Providing data collected from the data subject is optional but essential for processing for the purposes set out under points a) and b). If data subjects do not provide the essential data and do not permit processing, the proposed services cannot be performed or implemented and contractual obligations cannot be fulfilled. This may prejudice the correct fulfilment of legal obligations, including accounting, tax and administrative obligations.

Except as specified for browsing data, the user is free to provide personal data for cookies and specific requests through forms, for example concerning products and/or services. Failure to provide such data may make it impossible to obtain what has been requested. For all data that are not essential, including sensitive data, provision is optional. In the absence of consent, or where certain data, including sensitive data, are incomplete or incorrect, the requested formalities may be so incomplete as to cause prejudice in terms of penalties or loss of benefits. This may arise either because it is impossible to ensure that processing is consistent with the obligations for which it is carried out or because the results of the processing may not comply with the legal obligations for which it is intended. The undersigned organisation shall therefore be exempt from any liability for any penalties or adverse measures.

METHODS OF DATA PROCESSING

Processing connected with the website's services is carried out using automated tools for the time strictly necessary to achieve the purposes for which the data were collected. It takes place on servers in Italy or the EU and is handled only by technical personnel authorised to process the data, or by personnel responsible for maintenance and administration operations. Specific security measures are observed to prevent data loss, unlawful or incorrect use, unauthorised access and loss of confidentiality. The organisation uses intrusion-prevention devices, firewalls, logs and disaster recovery measures. Specific mechanisms are used for encryption and segregation of data and for user authentication and authorisation.

Data processing means their collection, recording, organisation, storage, processing, modification, erasure and destruction, or a combination of two or more of these operations. In relation to the purposes indicated above, personal data are processed using manual, computerised and telematic tools, according to logic strictly related to those purposes and, in any event, in such a way as to guarantee security and confidentiality.

Personal data will therefore be processed in accordance with Article 5 of EU Regulation 2016/679. Among other things, that Article requires data to be processed lawfully and fairly; collected and recorded for specified, explicit and legitimate purposes; accurate and, where necessary, kept up to date; relevant, complete and not excessive in relation to the purposes of processing; and handled in compliance with the fundamental rights and freedoms and the dignity of the data subject, with particular reference to confidentiality and personal identity, through protection and security measures. The undersigned organisation has established, and will further improve, its data access and storage security system.

No automated decision-making process (for example, profiling) is carried out.

TRANSFERS OUTSIDE THE EU

Processing does not take place in countries outside the EU and the EEA.

RETENTION PERIOD

As a general rule, personal data will be retained for as long as the purposes of processing continue to apply, depending on the category of data processed.

CATEGORIES OF RECIPIENTS

Only essential data are communicated to:

- authorised personnel and data processors, both internal and external to the undersigned organisation, who perform specific tasks and operations (website administration; analysis of browsing, traffic and profiling data; management of emails and forms voluntarily submitted by users), in the cases and to the persons provided for by law.

The data will not be disseminated unless otherwise required by law or after anonymisation. Without prejudice to the provisions concerning cookies and third-party elements, in the absence of the data subject's prior general consent to communications to third parties, only services that do not involve such communications may be provided. Where necessary, specific and explicit consent will be requested, and the persons receiving the data will use them as independent data controllers.

In certain cases (not part of the ordinary management of this website), the Authority may request news and information for the purpose of supervising personal data processing. In such cases, a response is mandatory under penalty of an administrative sanction.

RIGHTS OF THE DATA SUBJECT

At any time, where applicable, you may exercise your rights (access, rectification, erasure, restriction, portability, objection and the right not to be subject to automated decision-making) against the Data Controller pursuant to Articles 15 to 22 GDPR ([link to the legislation](#)); lodge a complaint with the Italian Data Protection Authority (www.garanteprivacy.it); and, where processing is based on consent, withdraw the consent given. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

DISABLING COOKIES

Almost all browsers allow users to manage and disable cookies so that their preferences are respected. In some browsers, rules can be set to manage cookies on a website-by-website basis, providing more precise control over user privacy. Another feature available in some browsers is private or incognito browsing, so that all cookies created in this mode are deleted when it is closed.

Please refer to the following instructions for managing cookies in the relevant browsers:

- [Chrome](#)
- [Firefox](#)
- [Internet Explorer / Microsoft Edge](#)
- [Safari](#)

CONTACT DETAILS

The Data Controller is SV SOFTWARE S.r.l., represented by its legal representative pro tempore.

Registered office: Via Bobbio 14, Turin, Italy.

Contact details: telephone +39 011 8996483; email hr@svsoftware.it.

The full list of data processors is available on request.

English translation of the Italian privacy notice published by SV Software. This translation reproduces the content of the source document and does not constitute an update of that notice.