

# Privacy Policy

This information is provided, pursuant to articles 13 and 14 of Regulation (EU) 2016/679 (hereinafter "GDPR"), to those who connect to the website ("www.circlegroup.eu") owned by CIRCLE S.p.A. parent company of the CIRCLE Group, an Italian corporate group operating in the field of digitalization of the logistics and port supply chain or to those who release spontaneous personal information during events and fairs in which Circle SpA participates.

It is intended to describe the processing of personal data of users who release personal information (eg business cards) and consult the site and / or who use the features and services made accessible through the site itself, such as merely for example purchase of goods and services, participation in discussion forums, etc.

This information is provided only for the Site and for the additional sites owned by CIRCLE S.p.A. but not for other websites owned by third parties that may be consulted by users through specific links.

Users are advised to read this information carefully before submitting / issuing any personal information and / or filling in any electronic / IT form (management, accounting, etc.) on the Site or any paper form (registration form, forms d'ordini, etc.) present on site during events / fairs / seminars

## 1. TYPE OF DATA PROCESSED

CIRCLE S.p.A., in the context of its activity and the relationship that links us, can collect the following types of personal and business data:

- Personal data: Name, Surname, Date of Birth, Tax Code, VAT Number, Company Name, Task, Role, Assignment and similar;
- Contact: Addresses of residence, domicile or place of work, Telephone Numbers, Email addresses or PEC and similar;
- Accounting data: Tax data, Banking, payment and similar data;
- Other personal data voluntarily provided by users during the registration phase.

In the case of the Site [www.circlegroup.eu](http://www.circlegroup.eu), this is accessible to all without the need to enter with credentials and personal data.

### 1.1 Navigation data

The computer systems and software procedures used to operate the Site ([www.circlegroup.eu](http://www.circlegroup.eu)) automatically acquire, during their normal operation, some data from the browser used which is then implicitly transmitted in the use of Internet communication protocols.

This category of data includes, for example, IP addresses, domain names of computers used by users who connect to the Site, URI (Uniform Resource Identifier) addresses of the requested resources, the time slot of the request to the server, the method used in submitting the request to the server, the size of the file obtained in response, the numeric code indicating the status of the response given by the server and other parameters relating to the operating system and the user's computer environment.

This information is not collected to be associated with identified interested parties and can be used by CIRCLE S.p.A. in order to obtain anonymous statistical information on the use of the Site and to check its correct functioning.

This information could also be used to ascertain responsibility in case of hypothetical computer crimes against the Site

## **1.2 Cookies**

The Site uses cookies. In this regard, users are invited to carefully read the relevant cookie policy (<https://www.circlegroup.eu/cookie-policy/>)

## **1.3 Personal data provided by users**

CIRCLE S.p.A. also collects personal data entered by users in the registration form or otherwise voluntarily provided by users for example to participate in events, fairs or seminars organized by CIRCLE S.p.A. or to request goods or services offered through the Site.

## **2. PURPOSE OF THE TREATMENT**

Your personal data is collected to provide the following services:

Without the need for your express consent (Article 6 letter b), e) GDPR), for the following Service Purposes:

- (a) conclude the contracts for the owner's services;
- (b) fulfill pre-contractual, contractual and fiscal obligations deriving from existing relationships with you;
- (c) to fulfill the obligations provided for by law, by a regulation, by EU legislation or by an order of the judicial authority (such as in the field of anti-money laundering);
- (d) exercise the rights of the Holder, for example the right to defend in court;

With the need for your specific express consent (art. 6 letter a) GDPR), for the following purposes:

- (e) send you commercial communications relating to events, fairs, seminars, workshops for which you may be eligible;

## **3. METHOD OF TREATMENT**

Personal data will be processed in full compliance with the principles of confidentiality, correctness, necessity, relevance, lawfulness and transparency imposed by the GDPR.

The processing of personal data will be carried out mainly through the use of electronic tools, with logics strictly related to the purposes and in any case in order to guarantee the confidentiality and security of personal data in compliance with the regulations in force. Suitable security measures will be observed to prevent the accidental destruction or loss of personal data, their unlawful or incorrect use of data or unauthorized access or unauthorized processing.

The personal data collected are processed at the offices of the owner located in Italy, Piazza Borgo Pila 40 (Torre A interno 46) 16129 Genoa

Personal data are processed by internal staff of the Data Controller (employees, collaborators, System Administrator) identified and authorized for processing, duly instructed to do so in compliance with privacy regulations and data security.

The processing of personal data may also take place, on behalf of the Data Controller, by data processors (external) specifically designated pursuant to art. 28 of the GDPR.

The storage and archiving of the data takes place at the offices of the Data Controller in the Administrative Office, where the deputy filing is held

No third party provider has access to the data, unless specifically required by law to fulfill the purposes indicated

#### **4. OBLIGATORY OR OPTIONAL NATURE OF PROVIDING DATA AND CONSEQUENCES OF ANY REFUSAL**

Personal data will be processed in full compliance with the principles of confidentiality, correctness, necessity, relevance, lawfulness and transparency imposed by the GDPR.

The communication of data for the purposes referred to in the previous section (2 a, b, c, d) is mandatory as it is aimed at fulfilling requests from the interested party and / or to conclude and execute contracts concluded with the same. The absence of data and / or any refusal to process will result in the inability of the data controller to fulfill its contractual obligations, or provisions issued by the competent authorities.

The provision by the user of personal data for marketing purposes referred to in the previous section (2 e) is, however, optional and the relative processing can only take place with the express consent of the user, therefore you can decide not to provide your consent, or revoke it at any time. Failure to provide personal data for these purposes does not prevent the user from accessing the various areas of the Site or participating in the initiative / competition in which one is interested or receiving information or providing the requested goods and / or services.

#### **5. SCOPE OF COMMUNICATION AND DIFFUSION OF DATA**

To pursue the purposes referred to in point 2 above and within the limits of what is strictly necessary, the user's personal data may be brought to the attention of employees, collaborators and / or agents of CIRCLE SpA, authorized for the purpose for processing and / or appointed as data controllers, in accordance with and within the limits of the tasks and duties assigned to them.

Furthermore, they will be able to learn and / or be communicated and / or made accessible to the user's personal data pursuant to art. 15) of the GDPR to the following subjects that carry out activities connected, instrumental and / or support to the activities of CIRCLE S.p.A. and to which the latter may turn - after appointment as data processors - for the performance of the aforementioned activities, within the limits of what is strictly necessary and in compliance with the purposes referred to in point 2 above:

- (i) the managers and administrators of the IT system of which CIRCLE S.p.A. it makes use of;
- (ii) the persons who carry out management and / or processing activities of the CIRCLE S.p.A. data base;
- (iii) the subjects who carry out activities for the collection of purchase orders for goods and services by users;
- (iv) the subjects who carry out assistance and consultancy activities in favor of CIRCLE S.p.A. in administrative, accounting, tax and legal matters;
- (v) the persons who carry out assistance and consultancy activities in favor of CIRCLE S.p.A. in the field of marketing;
- (vi) the persons who perform in favor of CIRCLE S.p.A. logistics, shipping and transport activities;

(vii) subjects to whom the right to access personal user data is recognized by law, regulations and / or community legislation.

(viii) third parties (eg sponsors, partners) exclusively for purposes related to sponsorship and promotion;

The updated list of data processors and authorized persons is kept at the Data Controller's registered office and can be provided upon request by the interested party by sending an email to the following address: [privacy@circletouch.eu](mailto:privacy@circletouch.eu).

If you decide to express your consent to the use of personal data for the purposes referred to in the previous section (2 e), they may be made accessible to the subjects indicated in the previous points (VIII) and specifically to third party companies operating in the sector editorial and to companies operating in the following sectors with which CIRCLE SpA could enter into partnership agreements: social networking platforms and interactive platforms, consumer goods, distribution, financial, insurance, automotive, services and humanitarian and charitable organizations, as well as telecommunications, for commercial and / or promotional purposes.

Instead, the user's personal data will not be disseminated to other subjects not involved in the processing.

## **6. TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES**

Any transfer of data abroad to non-EU countries will be in accordance with the provisions contained in Chapter V, GDPR (articles 44 and following), selecting the service providers from those who provide adequate guarantees and after stipulating the clauses contractual standards provided by the European Commission.

## **7. OWNER OF THE TREATMENT**

The data controller is CIRCLE S.p.A., with registered office in Via Giovanni Battista Pergolesi 26,20124 Milan, ITALY, VAT no. And cod. tax and registration RI of Milan 07869320965 REA n. 1987108.

## **8. THE RIGHTS OF THE INTERESTED PARTIES**

In relation to the processing of your personal data, you have the right to ask CIRCLE S.p.A . :

- access: can request confirmation that data processing concerning him or her is being processed, know the origin, methods and purposes of the processing, as well as more clarifications about the information referred to in this Notice, as well as receive the data itself, within the limits of reasonableness;
- the rectification: may request to rectify or supplement the data that you provided or in our possession, if inaccurate;
- cancellation: may request that your data acquired or processed by CIRCLE S.p.A. they are canceled, if they are no longer necessary for our purposes or where there are no disputes or disputes in progress, in the event of withdrawal of consent or its opposition to processing, in the event of unlawful processing, or if there is a legal obligation to cancel;
- the limitation: may request the limitation of the processing of your personal data, when one of the conditions referred to in art. 18 of the GDPR; in this case, your data will not be processed, except for storage, without your consent except for what is stated in the same article in paragraph 2.
- the opposition: may at any time object to the processing of its data on the basis of our legitimate interest, unless there are our legitimate reasons for proceeding with processing that prevail over yours, for example for the exercise or our defense in judicial seat; its opposition will always and in any case prevail over our legitimate interest in processing your data for marketing purposes;

- portability: can request to receive your data, or have it transmitted to another owner indicated by you, in a structured format, commonly used and readable by an automatic device. Furthermore, pursuant to art. 7, par. 3, GDPR, we inform you that you can exercise your right to revoke your consent at any time, without jeopardizing the lawfulness of the processing based on the consent given previously.

We inform you that you also have the right to lodge a complaint with the Control Authority, which in Italy is the Guarantor for the Protection of Personal Data.

To exercise these rights, report problems or ask for clarification on the processing of your personal data, you can contact the Data Controller

Requests should be addressed to the Data Controller, Dr. Alexio Picco, contacting CIRCLE S.p.A. via the Data Access Request Form, or by writing via the email address "privacy@circletouch.eu" or in writing to the address Administrative Office Piazza Borgo Pila 40 (Torre A interno 46) 16129 Genova

If you wish to make a complaint about how your personal data was handled, you can contact CIRCLE S.p.A. through the Data Controller, Dr. Alexio Picco, following the procedures indicated above.

We will examine your complaint and work with you to resolve the problem.

If you believe that your personal data have not been handled appropriately according to the law, you can contact send a complaint to the Supervisory Authority:

Guarantor for the protection of personal data (Public Relations Office - URP; address: Piazza di MonteCitorio n. 121- 00186 - ROME, Italy; Tel .: +39 06.69677.2917; E-mail: urp@gpdp.it, garante@gpdp.it; certified mail: rapidly@pec.gpdp.it

To read the information online you can visit the site at: <https://www.circlegroup.eu/cookie-policy/>