

POLICY ON THE PROCESSING OF PERSONAL DATA FOR NAVIGATION OF THE WEBSITE AND COOKIES

Pursuant to Articles 12 ff. of Regulation (EU) 2016/679 (GDPR)

Subject

Policy on the processing of personal data pursuant to Articles 12 ff. of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016.

Preamble

Regulation (EU) 2016/679 (“General Data Protection Regulation”), hereinafter the GDPR, provides for the protection of natural persons with regard to the processing of personal data. With regard to this regulation, DevStudio undertakes to ensure that the processing of data concerning a natural person (hereinafter the “data subject”) is carried out in accordance with the principles of accuracy, lawfulness and transparency and the protection of the privacy and rights of the data subject.

With regard to the provisions of Regulation EU 2016/679 (European regulation on the protection of personal data) we hereby provide you with the required information concerning the processing of personal data supplied by you.

Our organisation, as controller, will process your personal data in accordance with the Regulation with all due care by implementing effective management procedures and processes in order to ensure the protection of processing. For this purpose, the undersigned undertakes to protect the information provided by using physical and management procedures to prevent unauthorised access or disclosure, maintain the accuracy of the data and ensure that they are used appropriately.

Legal basis of processing

This website processes data on the basis of consent. By using or consulting this website, visitors and users expressly accept this privacy policy and consent to the processing of their personal data by the methods and for the purposes described below, including any dissemination to third parties if necessary for the provision of a service.

The provision of data and thus consent to the collection and processing of data is mandatory for continued navigation of the website.

In accordance with this requirement, the following information is to be provided:

Personal data collected and the mandatory or optional nature of the provision of data and consequences of any refusal

Like all websites, this one uses log files in which information collected automatically during users’ visits is stored. The information collected may be the following:

- internet protocol (IP) address;
- type of browser and parameters of the device used to connect to the website;
- name of the internet service provider (ISP);
- date and time of visit;
- source web page of the visitor (referral) and exit;
- if applicable, the number of clicks.

The above information is processed automatically and collected in order to verify the correct operation of the website and for statistical or security reasons.

For security reasons (antispam filters, firewall, virus detection), the data automatically recorded may also include personal data such as the IP address, which could be used in accordance with the applicable legislation in order to block attempts to damage the website itself or to cause damage to other users or any harmful or criminal activities. Such data are never used for the identification or

profiling of the user, but only to protect the website and its users.

In the course of their normal operation, the information systems and software procedures used to operate this website acquire some personal data, the transmission of which is implicit in the use of the internet communications protocols. Data in this category include the IP addresses or domain names of the computers used by the users connecting to the website, the URI (Uniform Resource Identifier) addresses of the resources requested, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the code number indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the user's operating system and IT environment.

Apart from the data required for navigation, the user is free to provide personal data in addition to those previously specified by registering on the website.

Failure to provide these may make it impossible to obtain what has been requested or to provide some services and the experience of navigating the website may be compromised.

DevStudio assures you that it does not in any circumstances collect your "sensitive" data.

Periods for which your data are stored

Personal data collected during navigation will be stored for the time necessary to carry out the specified activities, but for not more than 26 months. The data provided voluntarily by the user will be stored until the customer withdraws consent.

Processing methods

As defined in and for the purposes of Articles 12 ff. of the GDPR, we wish to inform you that the personal data provided by you will be recorded, processed and stored in our electronic archives with the adoption of technical and organisational measures designed to protect such data. The processing of your personal data may consist of a number of operations or set of operations among those specified in Art. 4, subpara. 1, point 2 of the GDPR.

Personal data will be processed using instruments and procedures appropriate to ensuring the security and confidentiality thereof and this may be carried out directly and/or through designated third parties with the aid of IT systems or electronic tools.

Transfer of personal data abroad

The data provided by you will only be processed in Italy. If in the course of a contract your data are transferred to a third country or international organisation, your rights under Union law will be guaranteed and you will be given timely notification.

Purposes of processing of personal data

In the case of all users of the website, personal data may be used to:

- enable navigation through the public pages of our website;
- respond to requests received via the email addresses published on the website;
- obtain anonymised statistical information on the use of the website (e.g. analyses of the most visited pages);
- obtain anonymised statistical information on the geographical areas from which requests come;
- control the correct operation of the website;
- ascertain any liability in the case of crimes causing damage to the website.

In addition to the purposes described above, the personal data of users who register on the website will also be processed for purposes connected with the services requested and in particular in order to:

- request information on DevStudio solutions;
- display information material and demos of DevStudio products and services;
- enable navigation through the private pages of our website;
- register users for the service requested;
- fulfil contractual obligations in respect of the service requested, where provided for;
- market products and services;
- send advertising, technical or promotional information by email (subject to your authorisation)
- sell directly over the web (subject to your authorisation);

Extent of access to your data

The following categories of persons appointed as managers or charged with processing by the undersigned may have access to your data. DevStudio workers, employees or contractors in general employed in:

- DevStudio administration;
- The sale of services;
- Marketing;

Cookies

Please note that when navigating the DevStudio website cookies defined as technical will be downloaded, namely:

- session cookies used to add online purchases to the cart; authentication cookies; cookies for multimedia content such as flash player which do not persist beyond the end of the session; personalisation cookies (for example for the choice of navigation language), etc.;
- cookies used for statistical analysis of access/visits to the website (so-called "analytics") which are solely for statistical purposes and collect information in aggregated form.

Moreover, users navigating the DevStudio website may be redirected to functions on other websites which in turn use cookies, such as:

Google Maps

Some pages contain interactive maps provided by Google, which may install cookies to collect information and identify preferences relating to this service.

For further information on Google's use of cookies, please consult Google's privacy policy:

<http://www.google.com/intl/it/policies/privacy>

YouTube

Some pages contain videos published on YouTube, which may install cookies to identify preferences relating to the use of this service. For further information on how YouTube uses cookies, please consult the privacy policy: <http://www.google.com/intl/it/policies/privacy>

Google Analytics

In order to identify how often users visit each page on the website, how long they spend there and how often this generates interest.

How to disable cookies?

Most browsers (Internet Explorer, Firefox, Chrome, etc.) are configured to accept cookies. The cookies stored on the hard disc of your device can, however, be deleted and it is also possible to disable cookies by following the instructions provided by the main browsers at the following links:

Chrome

<https://support.google.com/chrome/answer/95647?hl=it>

Firefox

<http://support.mozilla.org/it/kb/Eliminare%20i%20cookie>

Internet Explorer

<http://windows.microsoft.com/it-it/internet-explorer/delete-manage-cookies#ie=ie-10>

Opera

<http://www.opera.com/help/tutorials/security/privacy/>

Safari

<http://support.apple.com/kb/ph11920>

Disclosure and dissemination

Your data provided on registration may be disclosed outside the company, which is understood to mean made accessible to one or more specific parties, by the undersigned in order to fulfil all necessary legal and/or contractual obligations. In particular, your data may be disclosed to:

a) Public Authorities or Offices or authorities responsible for monitoring legal and/or contractual obligations.

Your data may be disclosed by the undersigned on the following terms:

- to parties which can access this data under the provisions of laws, regulations or Union legislation, within the limits provided for in such laws, regulations or legislation;
- to parties which need to access your data in order to support the relationship between you and us, within the limits strictly necessary to fulfil such support tasks;
- to our consultants and/or professionals, within the limits necessary to carry out their work for us or their organisation, subject to our letter of engagement which imposes a duty of confidentiality and security.

Dissemination – The undersigned will not disseminate your data indiscriminately, or in other words will not make them accessible to unspecified parties, including by providing them or allowing them to be consulted.

Trust and privacy – The undersigned considers the trust shown by data subjects who have consented to processing of their personal data as precious and therefore undertakes not to sell, rent or lease personal data to other parties.

Rights under Articles 15 ff. of the GDPR

Under Arts. 15 ff. of the GDPR you have the right to obtain confirmation as to whether or not personal data concerning you are being processed, recorded. You have the right to access your personal data

and to ask for them to be rectified or erased, to restrict processing or to object to processing entirely or in part.

You have the right to obtain from the controller access to the following information:

- a) the purposes of the processing;
- b) the categories of personal data concerned;
- c) the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
- d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- e) where the personal data are not collected from the data subject, any available information as to their source;
- f) the existence of automated decision-making, including profiling, referred to in Article 22 subparagraphs (1) and (4) and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

Where personal data are transferred to a third country or to an international organisation, you have the right to be informed of the appropriate safeguards pursuant to Article 46 of the GDPR.

In order to exercise these rights, you can contact our Organisation “*Controller of the processing of personal data*” at privacy@devstudio.it or by calling 055/6810921 or sending a message to the DevStudio Privacy Office, Via G. Ambrosoli 32 – 50136 Florence. The controller will reply to you within 30 days of receipt of your formal request.

We would remind you that in the event of a breach of your personal data, you have the right to lodge a complaint with the competent authority: “Data Protection Supervisor”.

Details of the controller and, if appointed, the representative in the territory of the Member State and the data protection officer.

Controller

The controller is the undersigned DevStudio S.r.l., having its registered office at Via G. Ambrosoli 50136 Florence Tel.: 055/6810921; Certified email: devstudiosrl@pec.it; Email: privacy@devstudio.it .

Data protection officer

The data protection officer (DPO) is named as Mr. Daniele Ceccarelli, Tel.: 055/6810921, Email: privacy@devstudio.it.

Processor

DevStudio does not envisage appointing a processor for the purposes referred to above.

Representative established in the territory of the Member State

Please note that pursuant to Article 4 subparagraph 1 point 17 of the GDPR, there being no circumstance envisaged by the said Regulation that requires such appointment, our organisation has not appointed a representative established in the territory of the Member State for the purposes of application of the regulation on the processing of personal data.

Processing without the need for the data subject’s consent

Please note that the controller shall be entitled to process your data, even without your consent, where

this is necessary in order to:

- fulfil an obligation provided for by law, a regulation or Union legislation;
- fulfil obligations resulting from a contract to which you are party or to respond to your specific requests prior to the conclusion of the contract.

Moreover, your express consent is not required where the processing:

- a) concerns data from public records, lists, deeds or documents available to anyone, subject to the restrictions and methods established by the laws, regulations and Union legislation for the accessibility and publication of data or data relating to business activities processed in compliance with the legislation in force in relation to company secrets and intellectual property;
- b) is necessary to protect the life or physical safety of a third party (in such a case the controller has an obligation to inform the data subject of the processing of personal data by means of a notification even after the processing has been carried out, but without delay. In this situation, therefore, consent is expressed following submission of the notification);
- c) is necessary, to the exclusion of dissemination, in order to carry out defensive investigations pursuant to the law of 7 December 2000, No. 397, or to enforce or defend a right in court, provided that the data are processed exclusively for this purpose and for the period strictly necessary in order to pursue these, in compliance with the legislation in force in relation to company secrets and intellectual property;
- d) is necessary, to the exclusion of dissemination, in cases identified by the Supervisor on the basis of principles sanctioned by law in order to pursue a legitimate interest of the controller or a third party recipient of the data, including with reference to banking groups and subsidiaries or affiliates, where the data subject's fundamental rights and freedoms, dignity or legitimate interests do not take precedence.

THE CONTROLLER
for the processing of personal data

DevStudio S.r.l.