

Privacy Notice – Art. 13 Reg. Ue 2016/679 - GDPR

In compliance with art. 13 of the General Data Protection Regulation – Reg. UE 679/2016 (“GDPR”), we provide you all due information regarding the purposes and methods concerning the processing of your personal data in our possession.

1. DATA CONTROLLER | DATA PROCESSOR | DATA PROTECTION OFFICER

Data Controller: pursuant to articles 4 and 24 of the GDPR, the data controller is **TCPOS SA** (“TCPOS”), with its registered office at Manno (Switzerland), Via Cantonale 2C, Centro Galleria 2, in person of its legal representative.

Data Processor: pursuant to articles 28 of GDPR, TCPOS appointed QMI INTERACTIVE, in person of its legal representative, with its registered address at Via Mellerio 3, Milano (Italy) as data processor. The list of appointed data processors is constantly updated and is available at TCPOS’ headquarters.

DPO: pursuant to art. 37 of the GDPR, TCPOS has appointed a Data Protection Officer (DPO), whose contact details are the following: dpo@tcpos.com , +39 0371 5943191.

Representative within the EU: TCPOS, pursuant to articles 3.2 and 27 of GDPR, appointed ZUCCHETTI SpA, with registered address at Via Solferino 1, 26900 Lodi (Italy) as its representative within the EU for any issue related to data protection and privacy.

2. TYPES OF DATA UNDERGOING PROCESSING

Personal identification data

“Personal Data” means any information relating to an identified or identifiable natural person (“Data Subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Cookies

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3. PURPOSES OF DATA PROCESSING AND LAWFULLNESS OF TREATMENT

Personal Data will be processed by **TCPOS SA** in compliance with the principles of articles 5 et seq. of GDPR, in particular art. 6 “Lawfulness of processing” for the following purposes:

- To visit the current internet website;
- To interact with the “contacts” area and provide Personal Data by sending information requests;
- For administrative and accounting activities in general: data processing for administrative and accounting purposes are those related to organizational, administrative, financial and accounting activities regardless of the nature of data processed. In particular, internal organizational activities, those following contractual obligations’ fulfilment and information activities are related to these purposes;
- For marketing purposes.

Your Personal Data will be processed in compliance with the lawfulness requirement set out in art. 6 b) of the GDPR i.e. when processing is necessary for the performance of a contract to which the Data Subject is a party or in order to take steps at the request of the Data Subject prior to entering into a contract.

4. RECIPIENTS OR CATEGORIES OF RECIPIENTS OF THE PERSONAL DATA

The Personal Data collected will be treated confidentially and will not be disseminated. These data may be shared with the following third parties:

- Entities that provide services for the management of the information system used by TCPOS and the telecommunications networks, including e-mail service and website service management;

- Companies of TCPOS Group;
- Firms or companies which provide assistance and advice;

The above-mentioned entities shall act as data processors. The list of appointed data processors is constantly updated and available at TCPOS headquarters.

Data may be also shared, when necessary or required, with competent authorities enforcing the law and/or regulations promulgated by public bodies: these entities are acting in complete independence when performing their tasks in accordance with art. 52 GDPR.

5. TRANSFERS OF PERSONAL DATA TO THIRD COUNTRIES OR INTERNATIONAL ORGANISATIONS

The Personal Data to be processed may be shared with Companies contractually involved with TCPOS, within the European Union or abroad (outside the European Union) in compliance with the requirements stated in art. 44 and ss. of the GDPR. In particular, the collected Personal Data may be transferred to:

- Third Parties in order to perform a contract between the Data Subject and the Data Controller or for the implementation of pre-contractual measures taken at the Data Subject's request, in compliance with art. 49.1 b) of the GDPR;
- Third Parties outside the European Union in case the transfer is necessary for the conclusion or performance of a contract concluded in the interest of the Data Subject between the Data Controller and another natural or legal person, in accordance to art. 49.1 c) of the GDPR;
- Third Parties based on an adequacy decision, pursuant to art. 45 of the GDPR;
- Third Parties bound by a Data Transfer Agreement, in accordance to art. 46.2 c) GDPR. The Data Subject may require a copy of the Personal Data provided by writing to TCPOS SA, Manno

6. DATA STORAGE TIME AND CRITERIA

The Personal Data processing will be carried out by electronic, automated and/or manual instruments, with methods and tools ensuring maximum security and confidentiality, by persons authorized to do so in compliance with the requirements of article 29 of the GDPR. Personal Data will be kept for a period not exceeding the purposes for which data were collected and subsequently processed, in compliance with art. 5.1 e) of the GDPR.

7. NATURE OF UNDERWRITING AND REFUSAL

The provision of Personal Data for the purposes listed in point 3 above is necessary to send information requests and to be contacted by TCPOS. Without provision of the required Personal Data TCPOS may not be able to contact the applicant.

8. DATA SUBJECTS' RIGHTS

In accordance to art. 15 et seq. GDPR, the Data Subject has the following rights toward the Data Controller:

- access to Personal Data;
- rectification or erasure of Personal Data;
- restriction of processing;
- receive own Personal Data previously provided to the Data Controller, in a structured, commonly used and machine-readable format;
- transmit those data to another Controller without limitation from the Controller to which the Personal Data have been originally provided (data portability);
- right to object to automated individual decision-making (i.e. the Data Subject has the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her);
- right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;



ZUCCHETTI GROUP

The Data Subject can exercise the above mentioned rights by contacting the Data Controller TCPOS SA at the following telephone number+41 (0)91 604 20 43 or by sending an e-mail to privacy@tcpos.com. The Data Subject also has the right to file a complaint before the national Data Protection Authority.

Update: 04-06-18

**Data Controller
TCPOS SA**