

## INFORMATION

pursuant to article 13 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016

In accordance with Article 13 of the General Data Protection Regulation - Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter "**GDPR**"), we would like to explain how we collect, process, disclose and protect your personal data when you use our Services and our website.

<b>Data controller</b>
The Data Controller is ChatSim srl, with registered office in Milan (MI), Piazza Luigi di Savoia 22, tax code and Milan Companies Register number: 09088330965 (hereinafter " <b>Data Controller</b> " or " <b>Company</b> " or " <b>ChatSim</b> " or " <b>We</b> ").
<b>Data Protection Officer (hereinafter "DPO")</b>
The contact details of the DPO can be found on the Data Controller's website or at the Data Controller's registered office. For the exercise of your rights and for any communication, problem and/or request for clarification regarding the protection of your personal data, you can freely contact the DPO by writing to ChatSim srl, piazza Luigi di Savoia n. 22, 20124 – Milan (MI) or you can send us an email to <a href="mailto:info@chatsim.com">info@chatsim.com</a> .

### **Our principles**

ChatSim is committed to respecting your privacy. Privacy, security and compliance with current laws regarding the protection of personal data are important to us. Everything we do is aimed at ensuring the protection of you and the personal data that concern you.

### **Mandatory purposes for which your consent is not required**

<b>Scope</b>	<b>Legal basis of processing</b>
Manage the filing and storage of data, the sending of information and communications, including electronic, requested by you through the Company's website, the sending of documents relating to the relationship with the Company.	(Art. 6(1)(c) GDPR) Treatment necessary to fulfill a legal obligation to which the Data Controller is subject (Art. 6(1)(f) GDPR) Processing necessary for the purposes of the legitimate interests pursued by the Data Controller related to the organizational and administrative of its organization.

### **Optional purposes for which your consent is required**

<b>Scope</b>	<b>Legal basis of processing</b>
Statistics, commercial, promotional and marketing activities with the provision of material and information on new products, promotions, discounts, facilities and other services of interest by the Data Controller, including through the sending of special material in paper and/or electronic format, by telephone and/or newsletters (e-mail, SMS, mms,	(Art. 6(1)(a) GDPR) Consent

instant messaging); sending information and invitations to events organized or sponsored by the Company.

### **Communication of data**

Personal data may be disclosed to employees and/or contractors of ChatSim, appointed as authorized subjects or data processors, and communicated to other subjects or general categories of subjects other than the Data Controller, such as:

Third parties or categories	Scope	Notes
IT companies	Management, maintenance, updating of systems and software used by the Data Controller	Appointment to external data processor (article 28, GDPR). Information at the DPO
Providers of networks, electronic communication services and computer and telecommunication services for archiving, storage and management of data	Hosting, housing, Cloud, SaaS and other remote computer services essential for the rendering of the activities of the Owner; archiving and storage services of electronic documents pursuant to regulations	Appointment to external data processor (article 28, GDPR). Cloud Services may involve data processing in countries outside the EU, which guarantee appropriate confidentiality rights. Information at the DPO
Associates and subsidiaries	Organizational, administrative, financial and accounting management	Appointment to external data processor (article 28, GDPR). Appointment as joint data controllers (article 26, GDPR).
Law Enforcement and Judicial Authorities	Management of investigations by Investigative Bodies in the event of accidents	

### **Period of data retention**

We will keep your information for as long as it is strictly required by law. In the absence of specific legal requirements, the information is kept for the necessary time and within the limits provided for by the regulations in force, including in terms of limitation. More precisely, data are processed according to these data retention terms:

Personal data and documents	Data retention terms
Personal data and documents relating to the relationship with the Company	For the time needed to pursue the purposes of the processing and also subsequently, within the limits granted by law, for administrative and accounting purposes, as well as to enforce or protect the rights of the Data Controller, if necessary

### **Rights**

We inform you of the existence of some of your rights on personal data and the related processing that you may request from ChatSim.

Right	Description	How to make it effective
Right to revoke consent (Art. 13(2)(c) GDPR)	You have the right to withdraw consent for processing operations for which consent is required, without this affecting the lawfulness of the processing operations based on the consent given prior to withdrawal.	Website forms
Right of access to data (Article 15, GDPR)	You may request: a) the purposes of the processing; b) the categories of personal data concerned; c) the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular if they are recipients in third countries or international organizations; d) when possible, the period for which the personal data will be stored, or if that is not possible, the criteria used to determine that period; e) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing concerning the data subject or to object to processing; f) the right to lodge a complaint with a supervisory authority; g) where the data are not collected from the data subject, all available information as to their origin; h) the existence of automated decision-making, including profiling, referred to in Article 22(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. You have the right to request a copy of the personal data subject to processing	Website forms
Right of rectification (art. 16, GDPR)	You have the right to request rectification of incorrect personal data concerning you and to have incomplete personal data completed	Website forms
Right to be forgotten (art. 17, GDPR)	You have the right to obtain from the controller the erasure of personal data concerning you if the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed	Website forms
Right to restriction of processing (art. 18, GDPR)	You have the right to obtain from the data controller the restriction of processing if you have contested the accuracy of personal data (for a period enabling the data controller to verify the accuracy of the personal data) or if the processing is unlawful, but you object to the erasure of personal data and ask instead for its use to be restricted or if they are required by you for the establishment, exercise or defense of	Website forms

	legal claims, while the data controller no longer needs them.	
Right to data portability (Article 20, GDPR)	You are entitled to receive personal data about yourself which have been provided to us in a structured, commonly used and machine-readable format and you are entitled to transmit these data to another data controller if the processing: (i) based on your consent, (ii) on the contract and (iii) where the processing is carried out by automatic means, unless the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority, and transmission does not violate the rights of a third party.	Website forms
Right to object (Article 21, GDPR)	You have the right to object at any time to the processing of personal data for direct marketing purposes. In this case your data will no longer be processed for this purpose.	Website forms
Right to apply to the Authority for the Protection of Personal Data	You may lodge a complaint with the Supervisory Authority if you believe that the processing of the data relating to you violates the GDPR.	

#### **Changes and updates**

This information may also be subject to changes as a result of any changes and/or additions to regulations. Changes will be notified and the text of the constantly updated information will be available on the following website.