

## Privacy Policy Version 2.0

COMPETERE, C.F. 97760070587 with registered office in Piazza San Salvatore in Lauro n. 13, 00186 Roma, Italy (hereinafter the "Data Controller") pursues the protection of its users and their personal data.

This privacy notice has been drafted pursuant to Article 13 of the EU Regulation 2016/679 (hereinafter: "Regulation") in order to make our privacy policy acknowledgeable, to understand how your personal information is processed when you use the site <https://www.competere.eu/> (hereinafter: the "Site") and, where applicable, to give your express and informed consent to the processing of your personal data. The information and data provided by you or otherwise acquired in the context of the use of the Controller's services - such as, for example, the request for information or subscription to the newsletter - hereinafter referred to as the "Services" - will be processed in compliance with the provisions of the Regulation and the confidentiality obligations that inspire the Controller's activity. According to the provisions of the Regulation, the processing carried out by the Controller shall be based on the principles of lawfulness, fairness, transparency, purpose limitation and conservation, data minimisation, accuracy, integrity and confidentiality.



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### 1. Data Controller

The Data Controller of the processing activities carried out through the Site is COMPETERE as defined above, which can be reached at the following e-mail address: [data@competere.eu](mailto:data@competere.eu).

### 2. Personal Data Processed

We inform you that the Data Controller shall process your personal data which may consist of an identifier such as your name, an identification number, an online identifier or one or more characteristic elements of your physical, physiological, economic, cultural or social identity capable of making you identified or identifiable (hereinafter just "Personal Data"). The Personal Data processed through the Site are the following:

1. common data (name, surname, e-mail, telephone number)

#### a. Data provided using the site

The computer systems and software procedures used to operate the Site acquire, during their ordinary operation, some 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 interested parties, but by its very nature could, through processing and association with data processed by third parties, allow users to be identified. This category of data includes the IP addresses or domain names of the computers used by users connecting to the Site, the URI (Uniform Resource Identifier) notation 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 numerical code 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. These data are used for the sole purpose of obtaining anonymous statistical information on the use of the Site and to check its correct functioning, to identify anomalies and/or abuses, and are deleted immediately after processing. The data could be used to ascertain responsibility in the event of hypothetical computer crimes to the detriment of the Site or third parties: except for this possibility, at present, data on web contacts are not stored for more than seven days.



## **b. Data provided voluntarily by the data subject**

In using certain Services of the Site, the processing of Personal Data by third parties. With respect to such hypotheses, you act as autonomous data controller, assuming all the obligations and responsibilities. In this sense, you grant indemnity with respect to any dispute, claim, request for compensation for damages from processing, etc. that may be received by the Controller from third parties whose Personal Data have been processed through your use of the functions of the Site in violation of the applicable data protection regulations.

In any case, should you provide or otherwise process Personal Data of third parties in the use of the Site, you warrant as of now - assuming all related liability - that this particular processing hypothesis is based on a suitable legal basis pursuant to art. 6 of the Regulation that legitimises the processing of the information.

## **3. Purposes of processing**

The processing we intend to carry out, subject to your specific consent where necessary, has the following purposes:

- a. replying to messages and requests for information;
- b. fulfilling any legal, accounting and tax obligations;
- c. sending the newsletter.

## **4. Legal basis and obligatory or optional nature of the processing**

The legal basis for the processing of Personal Data for the purposes referred to in section 3(a) is Art. 6(1)(b) of the Regulation as the processing is necessary for the fulfilment of the data subject's requests. The provision of Personal Data for these purposes is optional but failure to provide it would make it impossible to respond to requests. The purpose set out in section 3(b) is a lawful processing of Personal Data within the meaning of Article 6(1)(c) of the Regulation. Once Personal Data has been provided, the processing is necessary to comply with a legal obligation to which the Controller is subject. The legal basis for the processing for the purpose referred to in section 3(c) is your consent within the meaning of Article 6(1)(a) of the Regulation, which you may revoke at any time.

## **5. Recipients of the personal data**

Your Personal Data may be shared, for the purposes set out in section 3, with:

- a. parties that typically act as data processors pursuant to art. 28 of the Regulation, i.e. persons, companies or professional firms that provide assistance and consultancy to the Controller in accounting, administrative, legal, tax, financial and debt collection matters relating to the provision of the Services; parties with whom it is necessary to interact for the provision of the Services (e.g. hosting providers); subjects delegated to carry out technical maintenance activities (including the maintenance of network equipment and electronic communication networks); (collectively, "Recipients").

The list of data processors may be requested by writing to the following address: [data@competere.eu](mailto:data@competere.eu)

- b. parties, entities or authorities, independent data controllers, to whom it is mandatory to communicate your Personal Data under provisions of law or orders of the authorities;



- c. persons authorised by the Data Controller to process Personal Data pursuant to Article 29 of the Regulations necessary to carry out activities strictly related to the provision of the Services, who have committed themselves to confidentiality or have an adequate legal obligation of confidentiality.

## **6. Transfers of Personal Data**

Some of Your Personal Data is shared with Recipients who may be located outside the European Economic Area. The data controller ensures that your Personal Data is processed by these recipients in accordance with the Regulation. Indeed, transfers may be based on an adequacy decision, on Standard Contractual Clauses approved by the European Commission or on another appropriate legal basis. More information is available from the Controller at: [data@competere.eu](mailto:data@competere.eu)

## **7. Data retention**

The Personal Data processed for the purposes set out in section 3 shall be kept for the time strictly necessary to achieve those purposes in accordance with the principles of minimization and limitation of the retention pursuant to Articles 5.1.e) of the Regulation. In any case, the Data Controller will process Personal Data for the time necessary to fulfil contractual and legal obligations. Further information on the data retention period and the criteria used to determine this period may be requested by writing to the Controller at the following address: [data@competere.eu](mailto:data@competere.eu)

## **8. Rights of the data subject**

Pursuant to Article 15 et seq. of the Regulation, you have the right to request at any time, access to your Personal Data, rectification or erasure of the same, restriction of processing in the cases provided for by Article 18 of the Regulation, to obtain in a structured, commonly used and machine-readable format the data concerning you, in the cases provided for by Article 20 of the Regulation. At any time, you may revoke, pursuant to Art. 7 of the Regulation, the consent you have given; you may lodge a complaint with the competent supervisory authority (Personal Data Protection Authority) pursuant to Art. 77 of the Regulation, if you believe that the processing of your data is contrary to the legislation in force. You may make a request to object to the processing of your data pursuant to Article 21 of the GDPR in which you give evidence of the reasons justifying the objection: the Data Controller reserves the right to assess the request, which would not be accepted if there are compelling legitimate grounds for processing that override your interests, rights and freedoms. Requests should be addressed in writing to the Controller at the following address: [data@competere.eu](mailto:data@competere.eu)

## **9. Amendments**

This privacy policy is in force from 2023-01-10. The Controller have the right to modify or simply update its content, in part or in full, also due to changes in applicable legislation. The Data Controller will inform you of such changes as soon as they are introduced and they will be binding as soon as they are published on the Site. The Data Controller therefore invites you to visit this section regularly in order to be aware of the most recent and up-to-date version of the privacy policy so that you are always up-to-date on the data collected and the use made of it by the Data Controller.