

OUR POLICY CONCERNING THE CORPORATE PRIVACY

This privacy policy explains how our company uses the personal data which are provided to us directly. The following information are only available for the <https://www.systemgroup.cloud> site and not for third-party websites accessible through hyperlinks included inside the Website.

WHO IS THE OWNER OF THE PERSONAL DATA PROCESSING?

The owner of the processing is HB Servizi S.r.l. placed in Lunano (PU), Via Foglia, n. 11, e-mail: privacy.systemgroup@tubi.net.

WHICH ARE THE PERSONAL DATA WE COLLECT?

When we talk about “personal data”, we refer to the subject data that fill out specific forms (ex. registration to the website or to an event/webinar), or visit the website.

Personal data includes name, e-mail address, telephone number, the company, the address, the place, postcode, the district and other information that are inside the message.

We process data that are provided intentionally by the user, through filling forms placed in some sections of the Website or through the sending of messages to e-mail addresses you can find in the Website, in order to provide services offered through the Website.

IT systems and software processes in charge of the website collect (during a normal service) some personal data that are transmitted automatically by using the Internet communication protocols. This data category might include: IP addresses or domain names of computers and devices used by users, URI/URL addresses (Uniform Resource identifier/Locator) of requested resources, request hour, method used for making the request to the server, file dimension obtained as response, numeric code that shows the status of the response gave by the server (successful, error, etc.), and other parameters related to the operating system and the user computing environment. *For further information please refer to the cookies policy of this website.*

HOW AND WHY WE USE YOUR PERSONAL DATA?

Personal data provided by the user will be processed for the following purposes:

A. To allow the website navigation.

In this case, data processing is essential in order to achieve the legitimate interest of the processing's owner, but at some conditions: the interests or rights and the fundamental freedom of the subject that require personal data protection, do not have to overcome. Reasonable expectations of the subject have to be taken into account because they are based on his/her relationship with the processing owner.

B. Website registration and account management are related to data provided through the filling of registration form, in order to allow you to register to the website, enter it and use the services reserved to the registered users. Without the data processing we can't give you the possibility to register to the website, enter it and use our services.

C. **Webinars and seminars registration.** Data given through the filling of webinar registration form are essential to be able to participate to webinars and seminars.

D. **For consultancy of our technicians through the website.**

In these cases (B, C, D) the personal data processing is essential in order to perform a contract.

E. **Answer to your requests** in order to answer to your requests of information, quotation, or requests concerning information, quotation or any type of request inside the message. If we can't process data we won't be able to satisfy your requests.

In these situations, processing of your personal data is essential in order to carry out pre-contractual measures.

F. **Update service through sending of communications** on services and products similar to those already purchased, at the e-mail box you provided us when you registered to our services.

You can always decide to refuse data processing for this purpose by exercising the rights through communications received by e-mail, by showing processing unsubscribe or objection to the processing, or by using the functionality for unsubscribe on every communication.

In this case our legitimate interest is to send you those communications (known as soft spam), as required by GDPR n. 47.

G. **Marketing.**

In order to keep you update on news and commercial offers concerning our products, services and third-parties, to conduct market researches or other type of commercial activities and customer satisfaction both through communication channels (like phone call from an operator) and through automatic communication tools like e-mails, chats, messages (like SMS and other types of instant messaging) and other tools of remote communication.

The processing of your data for the newsletter subscription and marketing purposes is not imperative. In these cases your data could be processed only after your explicit permission (entirely optional), revocable at any time without consequences.

HOW LONG DO WE KEEP YOUR DATA?

Processed data will be kept for a limited period of time. At the end of this period, data will be deleted or made anonymous. Storage period is different depending on processing purposes, in particular:

- For account management, data will be kept until the account cancellation;
- Data provided for the webinars and seminars subscription will be kept for the time required to provide service and sending of following communications;
- Concerning the sending of communications for services or products similar to those already purchased, data will be kept for 24 months starting from the last contact or the last feedback received regarding the contacts maintained. In any case, data will be kept until the unsubscribe to the service;

- Those data provided through the messages sent by e-mail will be kept for the time required to provide an answer;
- Personal data processed in order to allow you the web browsing are kept until the end of the browsing session. For further information please refer to the cookies policy of this website.

PROCESSING METHOD

Personal data are processed with automatic tools for a period of time that is required for achieving the purposes data have been collected for. Specific safety measures have been put in place in order to prevent data loss, illegal or incorrect use and non-authorized access.

TO WHOM YOUR DATA ARE DISCLOSED?

Your personal data are disclosed to:

- Collaborators and employees specifically authorised and trained by the Owner as part of his/her specific skills and tasks;
- Providers of services offered through Website or connected to its functioning that act in the role of processing managers (ex. hosting web service);
- Third-party companies or consultants in charge of installation, maintenance, updates and, in general, management of website's hardware and software;

Other than the above cases, personal data will not be communicated, spread, gave or transferred to third-parties for illicit purposes or not connected to the above aims. In any case, personal data will not be released without giving the appropriate policy to the subjects and without having their permission, if requested by Law.

It is without prejudice the possible data communication upon request of Judicial Authority or Public Safety, following the methods and cases required by law.

TRANSFER OF YOUR DATA IN THIRD-PARTIES COUNTRIES

Your personal data could be transfer abroad, even in extra EU countries, only after verification of standard contractual terms approved by European Commission (GDPR art. 46), or binding rules for the company (GDPR art. 47), or, without previous terms and rules, on the basis of one of the exemption measures according to GDPR art. 49.

YOUR RIGHTS REGARDING DATA PROTECTION

Our company wants to be sure you are entirely aware of all your rights regarding data protection. Every single user has the following rights:

Access right - You have the right to ask our company for copies of your personal data. We could charge you a small fee for this service.

Rectification right - You have the right to ask our company to correct every information you consider inaccurate. You also have the right to ask our company to complete the information you consider incomplete.

Cancellation right – you have the right to ask our company to delete your personal data.

Processing restriction right - you have the right to ask our company to restrict the processing of your personal data in accordance with the hypothesis specified in GDPR art. 18.

Right to oppose to the processing – you have the right to oppose to the processing of your personal data from our company for marketing and profiling purposes.

Data portability right - you have the right to ask our company to transfer the data we collected to another company or directly to you, in accordance with the hypothesis referenced by the GDPR art. 20.

If you make a request we can respond to you within one month. If you would like to exercise one of these rights, we kindly ask you to contact us at the following e-mail privacy.systemgroup@tubi.net.

HOW CAN YOU GET IN TOUCH WITH US?

If you have any question concerning our privacy policy, the personal data we keep or if you would like to exercise one of your data protection rights, please contact us.

Write at the following e-mail privacy.systemgroup@tubi.net

HOW CAN YOU CONTACT THE RELEVANT AUTHORITY?

If you would like to refer a complaint or if you think that our company has not addressed your worry in a satisfactory way, you can get in touch with the Supervisor Office by following directions in the link down below.

<https://www.garanteprivacy.it/home/docweb/-/docweb-display/docweb/4535524>

CHANGES IN OUR PRIVACY POLICY

Our company keeps under review your privacy policy and adds improvements on this website.