

## PRIVACY POLICY

This page describes the management methods of NetResults S.r.l. Websites concerning the processing of personal data of users consulting them. This disclosure is provided according to art. 13 of the European Regulation no. 2016/679 (hereinafter referred to as the GDPR) to those who interact with NetResults S.r.l. web services accessible electronically via <https://www.netresults.it> corresponding to the page of the NetResults S.r.l. and the company product sites <https://www.kalliope.com> and <https://www.atenatesting.com>.

The information is provided only for the websites of NetResults S.r.l. and not for other websites that the user may consult via links.

The information is also subject to European Authorities for the protection of personal data Recommendation no. 2/2001, in the Working Group art. 29 (previously named Working Party 29, now European Data Protection Board), adopted 17/05/2001 to identify certain minimum requirements for the collection of personal data online and, in particular, the methods, times and nature of the information data controllers must provide users when they connect to web pages, regardless of the purpose of the connection.

### **Identity and contact details of the owner and the person responsible for the protection of personal data**

The Data Controller is NetResults, in the person of its pro tempore legal representative, with headquarters in Via Agostino Bassi, 5, 56121 Pisa.

The Data Controller has appointed a Data Protection Officer (Personal Data Protection Officer) to contact regarding your rights or information relating to them or this information. These can be obtained by writing to NetResults, Via Agostino Bassi, 5, 56121 Pisa, or by emailing [privacy@netresults.it](mailto:privacy@netresults.it).

### **Data Processing**

The treatments connected to the web services of the company websites are handled solely by authorized personnel. The personal data provided by users is used only to perform the service or provision requested and are communicated to third parties only if necessary.

### **Types of data processed and storage times**

#### **Navigation data**

Computer systems and software procedures used to operate corporate websites acquire certain personal data implicit in Internet communication protocols during their normal operation. This information is not collected to be associated with identified interests. However, it could identify users through processing and associating data held by third parties. This category of data can include (but not exclusively):

- IP addresses or domain names of computers used to connect to the sites
- addresses in URI (Uniform Resource Identifier) notation of the requested resources
- 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.)
- other parameters relating to the operating system and the user's IT environment

This data is used to obtain anonymous statistical information on the use of the websites and to check their correct functioning. After processing, it is immediately deleted from the server unless used to ascertain responsibility for computer crimes against the sites.

### **User data provided voluntarily**

The voluntary provision of data to register on the site, request information, or subscribe to the newsletter entails the subsequent acquisition of certain personal data necessary for the execution of the requested service. Specific summary information will be reported or displayed on the pages of the sites set up for these particular services on request. Failure to provide such data may make obtaining what has been requested impossible. This data is kept for the time necessary to process received requests. After this time, the data will be made anonymous or deleted unless it is required to be kept for other and different purposes expressly provided by the provision of the law.

### **Cookies**

Cookies are used to perform computer authentication, session monitoring, and storage of specific information regarding users accessing the server and are usually present in each user's browser.

Cookies can be divided into three types:

- 1.) Navigation and functional cookies: necessary for the correct functioning of the site. If the user is registered, they allow access to the services offered and recognize the visitor on subsequent accesses. Functional cookies improve the quality and browsing experience. In some contexts,

disabling these cookies may not be technically possible, as they are necessary to guarantee the site's functionality. The law provides that sites can use technical cookies even without consent.

- 2.) Profiling cookies: used to create the user profile to send commercial messages based on preferences shown during the visit to the site or to improve the shopping and browsing experience;
- 3.) Statistical cookies: used to process statistical analyzes on users' navigation methods. The results of these analyzes are used anonymously and exclusively for statistical purposes.

For details on the cookies used on the websites of NetResults S.r.l., refer to the cookie policy (<https://www.iubenda.com/privacy-policy/37971464/cookie-policy>).

### **Treatment of data**

Any personal data acquired is processed by automated tools strictly for the time necessary to achieve the purposes for which it is collected. The system is equipped with appropriate and necessary security measures to prevent data loss, illicit or incorrect use, and unauthorized access. For processing purposes, no decision is made based solely on automated processing that produces legal effects that concern you or significantly affect your person.

### **Sharing, communication, and dissemination of data**

Personal data provided by users is used to perform the services or provisions requested and communicated to third parties only if necessary for the provision of the requested services (e.g., IT outsourcers). The personal data collected will not be transferred outside the European Union.

Except in these cases, data will not be communicated or granted to anyone unless contractually stipulated or authorized by the interested parties. In this sense, personal data could be transmitted to third parties, but only and exclusively in the case of:

- 1.) explicit consent to share data with third parties;
- 2.) the need to share information with third parties to provide the requested service;
- 3.) the need to fulfill requests from Judicial or Public Security Authorities.

### **Rights of the interested parties**

Under and for the purposes of the GDPR, you are granted the following rights as an interested party which you can exercise against the Company:

a) obtain access from the Data Controller and confirmation as to whether personal data concerning you is being processed, also to be aware of the processing and to verify its lawfulness as well as the correctness and updating of such data;

b) concerning the purposes of the processing, where inaccurate, the rectification of personal data concerning you, as well as the integration of the same, where deemed incomplete;

c) request the cancellation of data concerning you, where the data is no longer necessary concerning the purposes for which they were collected. Please note that cancellation is subject to the existence of valid reasons. Data cannot be deleted if its processing is necessary, among other things, for compliance with a legal obligation, for the performance of a task in the public interest, and the establishment, exercise, or defense of a legal claim in court;

d) request the limitation of processing or the adoption of technical and organizational measures limiting access to and modifying your personal data. This does not mean that the data is deleted but that the Data Controller must avoid using it during the period of the relative block;

e) the right to object, at any time, for reasons connected to your particular situation, to the processing of personal data concerning you in cases where the processing itself is necessary for the execution of a task of public interest or connected to the exercise of public powers vested in the Data Controller or if the processing is required for the pursuit of the legitimate interest of the same or of third parties;

f) right to withdraw the consent at any time without prejudice to the lawfulness of the treatment based on the consent given before the revocation, only for the purposes whose legal basis is the consent.

These rights may be exercised by contacting the Data Protection Officer (DPO) via a request sent by a registered letter with a return receipt to the following address: Via Agostino Bassi, 5, 56121, Pisa, or by sending an email to the email address: [privacy@netresults.it](mailto:privacy@netresults.it).

You may also immediately report to the DPO, using the contact details indicated above, any circumstances or events from which a personal data breach may arise, even potentially (i.e., any breach of security capable of causing, accidentally or illicit, destruction, loss, modification, unauthorized disclosure or access to data), to allow an immediate assessment and, where necessary, the adoption of actions aimed at countering this event.

Finally, we remind you that you have the right to lodge a complaint with the Guarantor for the protection of personal data or with another supervisory authority according to art. 13, par. 2, letter d) of the GDPR.

## **Changes to this policy**

NetResults S.r.l. periodically checks its privacy and security policies and, if necessary, reviews them concerning regulatory, organizational, or technological changes. In the case of modification of policies, the new version is published on this site page.