

PERSONAL DATA PROCESSING POLICY

According to the EU Regulation 2016/679, known as GDPR, and art. 13 Legislative Decree 196/2013, Interzen Consulting s.r.l. (hereinafter also just "Interzen") provides you with information regarding the processing of your personal data related with the completion of the contract and the established or establishing professional relationship.

Data processing purpose

Your personal data, including company data, provided by you and/or acquired from third parties (basically a network of agents, brokers, installers) even during the business relationship, will be processed by Interzen for the following purposes related to the execution of the contract established or establishing:

- a) development and maintenance of software applications, even on site, as well as delivery of products and/or equipment (for example: servers, printers, others) functional to the service provided;
- b) invoicing of the subscription fees and any additional service;
- c) management of any complaint and dispute, fraud prevention and management of delayed or missed payments;
- d) protection and possible recovery of the credit, directly or through third parties (credit recovery agencies/companies) with whom the data needed for these purposes will be shared;
- e) storage and use of accounting data relating to the timeliness of payments for decision-making in relation to future business relationships.

Furthermore, your personal data may be used by Interzen to assert or defend its own rights in court; in this case, data will be processed only for these purposes and in any case only for the time strictly necessary for their pursuit.

During the contractual subscription relationship, your data may also be processed in connection with the possible activation of additional services related to the main contract.

For professional clients (companies and professionals) Interzen may acquire information from public archives or registers (such as prejudicial registrations and protests). As part of accessing these sources, further information may also be acquired by statistical processing with a synthetic judgment (score) on your degree of reliability, based on the results of public data and data acquired from the contract to be activated, in run or terminated with our company.

This information will be used for the purposes of verifying your reliability and punctuality with payments and kept by Interzen for the time strictly necessary for the completion of the activities related to the completion of the contract and in any case for a period of time not exceeding two years from the aforementioned consultation.

The provision of your data for the purposes indicated in points a) to e) is therefore due for the finalization of the contract and the right fulfillment of the service contained therein; therefore, the relative treatment does not require consent.

In the event that you have expressed your further and specific consent at the time of finalizing the contract or you are expressing it later in time, some of your personal data may be processed by Interzen to communicate and/or send, also with automated procedures, advertising and information material.

The release of your data and your consent for the purpose of sending advertising and information material is optional, but may be needed to improve our products and services, as well as to communicate updates of interest to you. You can still verify and revoke any consent given for this purpose at any time by contacting the Data Controller.

Data processing methods

Data processing will be carried out manually (e.g. on paper) and/or through IT and telematic tools, adopting methods of data organization and processing, related to the purposes indicated above and, in any case, in order to guarantee security and confidentiality of data and communications.

Data controller

Data controller for your personal data is Interzen Consulting s.r.l., Strada Comunale Piana, 3 - 65129 Pescara (PE) Italy.

Employees and contractors, acting under direct authority of the data processor, have been designated as appointees and have been adequately trained.

Categories of third parties to whom the data could be disclosed

Personal data provided may be disclosed to:

- a) employees and collaborators of the Data Controller, as in charge of data processing;
- b) administrative and judicial bodies and authorities by virtue of legal obligations;
- c) third parties carrying out activities strictly connected and instrumental to the operation - even technical of Interzen services such as, for example:

- Companies providing archiving services, digital preservation of fiscal, administrative, payment and invoicing documents;
- Operators with whom Interzen is partnering for the installation and/or maintenance of IT systems;
- Companies to whom Interzen outsources advertising, promotion and sales to customers (in case of consent for such treatments by the interested party);
- Credit recovery companies;
- Companies to whom Interzen outsources printing and sending invoices and/or other documentation to customers.

Personal data provided will not be transferred outside the European Union and will not be distributed.

Period of storage of personal data

Personal data collected will be processed and stored for the entire duration of the contracted professional relationship. Starting from the date of expiration of the contract, the data will be kept for the duration of the applicable prescription terms according to the law.

Cookies

Interzen Consulting is Google Ads advertiser (client ID: 984-128-9516) for Search Engine Marketing campaigns. The way Google counts conversions of keyword advertising ads sets a new cookie on the web domain www.zenshare.it by which it connects conversions to ads. Such cookie has a unique identifier, is exclusively limited to web site users and helps to improve accuracy in measuring conversions of Google Ads campaigns.

Rights related to your data

You may always exercise your rights regarding personal data, but in some cases the Data Controller must consider your request in order to verify if it is possible to fulfil it. Your rights are:

a) Right of access.

You have the right to obtain confirmation that your personal data is being processed and, in this case, you can obtain the following information:

- processing purposes;
- categories of involved personal data;
- recipients or categories of recipients to whom the personal data are communicated or will be communicated;
- the amount of time the Data Controller is storing personal data;

- if data has not been personally supplied by you, you have the right to know what the source of the aforementioned data is, and whether the data comes from sources accessible to the public.

b) **Right of cancellation.** You have the right to ask us to delete data concerning you in one of the following cases:

- data is no longer needed;
- you have revoked your previous consent or have opposed a particular treatment;
- the Data Controller has a legal obligation to delete data concerning you.

c) **Right of rectification and integration.**

You have the right to obtain the correction of your inaccurate personal data from the Data Controller without justification. In relation to the purposes of the processing, you have the right to obtain the integration of your incomplete personal data, even providing a supplementary declaration.

d) **Right of portability of personal data.**

You have the right to receive personal data concerning you in a format compatible with common use and readable by commonly marketed devices. You have the right to transmit the aforementioned data to another data controller and to ask Interzen Consulting s.r.l. direct transmission from one holder to another. In this last case, the exercise of this right is subject to a technical feasibility check by Interzen.

e) **Right to object to the processing of personal data.**

You have the right to object to the further processing of your data, giving legitimate reasons connected to your particular condition. However, when processing is necessary for the performance of a task of public interest, to fulfill an obligation imposed on the Data Controller by law or when processing is necessary for the pursuit of Interzen's legitimate interest, Interzen will assess your request to check to what extent it can be satisfied.

f) **Right of limitation to data processing.**

You have the right to request the Data Controller to limit the processing of your data in the following cases:

- when you believe data concerning you possessed by the Data Controller are incorrect and you want to verify their accuracy;
- when you believe that your consent has not been validly given and instead of requesting the deletion of your data to the Data Controller, you prefer to state to what extent they can be used;
- when you want to prevent their cancellation because you must exercise your right in court;
- when you opposed to data processing, waiting for the verification of the possible prevalence of the Data Controller's legitimate reasons to continue processing.

g) **Right to lodge a complaint with the Control Authority.**

You can lodge a complaint with the Guarantor for the protection of personal data to complain about a violation of the regulations concerning the protection of personal data and to request a verification by the Authority. The complaint can be directly signed by you or by the associations that represent you. You will be able to send the document using the method you deem most appropriate, handing it over to the offices of the Guarantor (at the address indicated below) or by sending:

- registered mail with return receipt addressed to The Guarantor for the protection of personal data, Piazza Venezia, 11 - 00187 Rome;
- e-mail: garante@gpdp.it or protocollo@pec.gpdp.it;
- fax: 06/69677.3785.