



Privacy Policy - Privacy Policy

(Pursuant to Article 13 of EU Regulation 2016/679)

Smartpeg, as Data Controller (henceforth also simply "Data Controller") under the EU Regulation 2016/679 (henceforth also: "Regulation") attaches great value to the protection of personal data. We therefore invite you, before transmitting any personal data to the Controller, to read this Policy carefully: it contains important information about the processing of your Personal Data.

This disclosure:

- is understood to be made for the website <https://smartpeg.eu>, (hereinafter also: "Site");
- constitutes an integral part of the Site and the services we offer;
- is made pursuant to Article 13 of the Regulations, to those who interact with the web services of the Site and the Owner, either through simple consultation or through the use of specific services made available through the Site

The Holder can be contacted [at: privacy@smartpeg.eu](mailto:privacy@smartpeg.eu)

This document has been prepared pursuant to Article 13 of the Regulations in order to allow you to learn about our privacy policy, understand how your personal information is processed when you use our site and, where applicable, to give your free and informed consent to the processing of your Personal Data. The information and data you provide or otherwise acquire in the context of using Smartpeg's services will be processed in accordance with the provisions of the Regulations and the confidentiality obligations that inspire Smartpeg's business.

According to the rules of the Regulations, the processing carried out by Smartpeg will be based on the principles of lawfulness, fairness, transparency, purpose limitation and storage, data minimization, accuracy, integrity and confidentiality.



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1. Data controller

The owner of the processing of personal data is Smartpeg, Via Pietro Tuzi 11, 06128 - Perugia, VAT No. 03460790540, Tax Code 03460790540, which can be reached by email at_privacy@smartpeg.eu.

2. The Personal Data being processed

Through your navigation of the Site, we inform you that Smartpeg will collect and process your Personal Data, which may consist of an identifier such as your name, an identification number, an online identifier, or to one or more characteristic elements of your physical, economic, cultural, or social identity capable of making you identified or identifiable.

Other Personal Data you freely provide in the forms on the Site may be processed. No special data, as referred to in Art. 9.1 Reg. 2016/679/EU, will be processed.

a. Navigation data

The computer systems and software procedures used to operate the Site acquire, during their normal operation, some Personal Data whose transmission is implicit in the use of Internet communication protocols. This information is not collected to be associated with identified interested parties, but by its very nature could, through processing and association with data held 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 in submitting 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 computer 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 case of hypothetical computer crimes against the Site or third parties: except for this possibility, at present the data on web contacts do not persist for more than seven days.

b. Data voluntarily provided by the data subject

We may process personal and/or contact data such as first name, last name, e-mail and telephone. Data related to degrees of training and education contained in curricula. Data and meta-data related to the services we provide, including test and examination results and related information about the date, time and manner of use of services and/or taking of tests.

Should you disclose to Smartpeg Personal Data of third parties, you must guarantee - assuming all responsibility - that this particular hypothesis of processing is based on an appropriate legal basis within the meaning of Article 6 of the Regulation, which legitimizes the communication to Smartpeg and the related processing of the information in question.

3. Purpose of processing.

The data processing we intend to carry out may have the following purposes:

- a. To enable the provision of the Services you have requested such as:
 - site registration;
 - Sharing of content on the site;
 - Generic request for information;
 - recounts and analysis of resumes for purposes of collaboration or affiliation with the Institute;
- b. respond to requests for assistance or information;
- c. To fulfill any legal, accounting and tax obligations;
- d. assert or defend rights in court, in case of abuse in the use of the Site and/or our Services or for contractual or non-contractual litigation;

4. Basis of legitimacy and mandatory or optional nature of processing

The legal basis for the processing of Personal Data for the purposes set out in Section 3(a-b) is Article 6.1.b) of the Regulations as the processing is necessary for the provision of the Services or for the response to requests from the data subject. The provision of Personal Data for these purposes is optional but failure to provide it would result in the inability to activate the Services provided by the Site.

For processing purposes falling within the statutory purposes of Smartpeg, included in 3.a, data of individuals in regular contact with Smartpeg could be processed. In the event that you have benefited, for remuneration or free of charge, from services or goods from Smartpeg, your data could be processed for purposes of direct mailing of advertising material in relation to products or services of Smartpeg similar to those purchased by you, without your consent (so-called "soft spam"). The processing of your data for such purposes is the legitimate interest referred to in Art. 6.1.f) of the Regulations and Art. 130 paragraph 4 Legislative Decree 196/2003. In any case, in accordance with Art. 21 of the Regulations, you have the possibility to object to such processing at any time, initially or on the occasion of subsequent communications, easily and free of charge also by writing to the Data Controller at the above-mentioned contact details, as well as to obtain immediate feedback confirming that such processing has been stopped (Art. 15 of the Regulations).

The purpose referred to in Section 3.c represents a processing of Personal Data carried out in accordance with Article 6.1.c) of the Regulations, in fulfillment of a legal obligation. Once Personal Data is provided, the processing is indeed necessary to fulfill a legal obligation to which Smartpeg is subject. Processing for the purposes set out in Section 3.d would be carried out pursuant to Article 6.1.f) of the Regulations.

5. Recipients of Personal Data

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

- a. parties that typically act as data controllers pursuant to art. 28 of the Regulations i.e.: i) persons, companies or professional firms that provide assistance and consultancy to Smartpeg in accounting, administrative, legal, tax, financial and debt collection matters in relation to the provision of the Services; ii) subjects with whom it is necessary to interact for the provision of the Services (e.g. hosting providers) iii) or subjects delegated to carry out technical maintenance activities (including maintenance of network equipment and electronic communication networks); (collectively "Recipients"); the list of data processors that process data can be requested from the Data Controller.
- b. subjects, entities or authorities, autonomous data controllers, to whom it is mandatory to communicate your Personal Data by virtue of provisions of the law or orders of the authorities;

- c. persons authorized by Smartpeg to process Personal Data pursuant to Article 29 of the Regulations necessary to carry out activities closely related to the provision of the Services, who have committed to confidentiality or have an appropriate legal obligation of confidentiality (e.g., employees of Smartpeg)

6. Data Retention.

Personal Data processed for the purposes referred to in section 3(a-d) will be kept for as long as is strictly necessary to achieve those same purposes in compliance with the principles of minimization and limitation of storage ex art. 5.1.e) of the Regulations. In any case, the Data Controller will process the Personal Data for as long as necessary to fulfill contractual and legal obligations.

More information regarding the data retention period and the criteria used to determine this period can be requested by writing to the Data Controller.

7. Transfer of data abroad for the provision of content and information materials

In the event that for the sharing of information materials, platforms such as Facebook, Instagram or Zoom are used, it should be noted that this use of services could necessarily result in the export outside the territory of the European Union of the data of the data subject (identification data, contact details, data and meta-data relating to the days, times and content of the sessions) requesting this service. This transfer takes place on the basis of the exemption in Article 49 paragraph 1 letter b) of the Regulation, as the transfer proves occasionally necessary for the performance of service for which the data subject has expressed interest through a voluntary, free and informed act.

8. Rights of data subjects

Pursuant to Articles 15 et seq. of the Regulation, You have the right to request at any time, access to your Personal Data, rectification or deletion thereof, restriction of processing in the cases provided for in Article 18 of the Regulation, obtain in a structured, commonly used and machine-readable format the data concerning you, in the cases provided for in Article 20 of the Regulation. At any time, you may revoke ex art. 7 of the Regulation the consent given; lodge a complaint with the competent control authority ex art. 77 of the Regulation (Guarantor for the Protection of Personal Data: WWW.GARANTEPRIVACY.IT) 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 under Article 21 of the Regulations in which you give evidence of the reasons justifying the objection: the Data Controller reserves the



right to evaluate 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 Holder.

9. Changes

This privacy policy is effective as of October 1, 2024. Smartpeg reserves the right to change or simply update its content, in part or in full, including due to changes in applicable legislation. Smartpeg will inform you of such changes as soon as they are introduced and they will be binding as soon as they are posted on the Site. Smartpeg therefore invites you to visit this section regularly to become aware of the most recent and updated version of the privacy policy so that you are always up to date on the data collected and Smartpeg's use of it.

