

## PRIVACY POLICY

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The Regulation (EU) n. 679 / 2016 of the European Parliament and of the Council of 27 April 2016 (GDPR) has introduced innovative regulatory requirements for the protection of personal data, with organizational, operational and technological implications concerning the main management processes of the Data within the corporate environment.

The aforementioned Regulation, however, unlike the Italian Privacy Code, does not require the adoption of specific security measures but imposes on the Controllers and Processors a general obligation to adopt technical-organizational measures adequate to the risk associated with the Data Processing (art. 32 of the GDPR).

In compliance with the provisions of the GDPR regarding Personal Data protection, Uanataca illustrates, in this Policy, which Personal Data it acquires, how they are processed and for what purpose as well as the organizational and security procedures it has adopted. in order to guarantee the Processing of personal data against the risk of loss, destruction, falsification and illicit and/or unauthorized treatment.

Below there is the Privacy Policy pursuant to art. 13 of the GDPR (hereinafter also "Policy"):

### a) CONTROLLER

Uanataca SA unipersonale, a Bit4 Group Srl company, is the Controller, pursuant to art. 4, n. 7 of the GDPR, of all the Personal Data provided by the Subscribers in relation to the purposes referred to in this Policy.

Furthermore, for any information concerning the processing of Personal Data by Uanataca SA single-member company it is possible to write to the following contacts:

#### **Uanataca SA single-member company**

**Registered office:** Calle Riera de Can Toda n. 24-26 (08024) Barcelona - Spain

**Secondary office:** Via Diocleziano n. 107 (80125) Napoli - Italy

**Email address:** [info.it@uanataca.com](mailto:info.it@uanataca.com)

#### **Telephone number:**

(IT) +39 081 7625600

(ES) +34 935 272290

### b) DATA PROCESSOR/S

For the purposes of carrying out the activities relating to the Personal Data Processing, in accordance with this policy, Uanataca may use, pursuant to art. 28 co. 1 of the GDPR, of third parties who present sufficient guarantees to implement appropriate technical and organizational measures in such a manner that Processing will meet the requirements of the GDPR Regulation and ensure the protection of the rights of the data subject.

A complete list of Data Processors, if any, appointed by Uanataca can be requested from the latter at any time, by contacting one of the addresses indicated in the previous paragraph.

### c) DATA PROTECTION OFFICER (DPO)

Uanataca has designated, pursuant to art. 37 of the GDPR, a Data Protection Officer (DPO or DPO "*Data Protection Officer*") identifying him among those subjects who, pursuant to art. 37 n. 5 of the aforementioned

standard, possess the professional qualities, the requisites of specialist knowledge of the data protection legislation and practices.

The Data Protection Officer of Uanataca, who is the figure in charge of monitoring compliance with the GDPR Regulation, is available to respond to all requests from interested parties on how the data are processed and can be contacted at the Uanataca headquarters at the addresses indicated in the previous paragraph.

For the identification of the roles and tasks of the DPO, please refer to the provisions of art. 39 of the GDPR.

#### **d) DATA PROCESSING METHODS**

Personal Data are processed in paper and electronic format in compliance with the organizational and security measures provided for by the applicable law and the related Processing will be based on compliance with the principles of correctness, lawfulness, transparency, completeness, limitation of purposes and conservation, not excess, minimization and accuracy, integrity and confidentiality, as well as the principle of accountability pursuant to art. 5 of the GDPR in order to guarantee the most adequate security measures and reduce the risks of destruction / loss, unauthorized access or processing that does not comply with the purposes described in this document.

#### **e) PERSONAL DATA PROCESSED**

Pursuant to art. 4 n. 1 of the GDPR is meant by "*personal data*": "*any information concerning an identified or identifiable natural person ("interested"); is considered identifiable the person who can be identified, directly or indirectly, with particular reference to an identifier such as the name, an identification number, location data, an online identifier or one or more characteristic elements of his physical, physiological, genetic, psychic, economic, cultural or social identity*".

Are meant by "*personal data*", therefore, all those information or fragments of information that allow the identification of a natural person.

In order to execute requests for the issuance of qualified digital certificates by Subscribers as well as, as part of the contractual relationship with them, Uanataca will process the following categories of Personal Data:

- **Personal data:** all personal data that allow the certain identification of a natural or legal person, provided at the time of the request for issuance of the certificate including: name, surname, sex, date and place of birth, tax code, address of residence/domicile, home/mobile telephone number, VAT number, details and copy of a valid identity document, or other information such as, for example, the company where the person works or provides service, the position held and sector of activity;
- **IT data:** IP address of origin, log; this category also includes images and videos, acquired during the remote video-recognition session (via webcam), in the case of identification through the use of this procedure, of the subjects to be identified.
- **Other identification data:** including data and documents referable to the Subscriber or the Holder that Uanataca may come into possession during identification activities or maintenance and/or technical assistance interventions (by way of example and not limited to bank data (IBAN code and bank / postal data of the User), possibly contained in the IT data referred to in the previous paragraph.

Uanataca never asks to provide, on the occasion of the request for the issue of the digital certificate, the so called "*Special categories of personal data*" defined pursuant to art. 9 of the GDPR that reveal racial or ethnic origin, political opinions, religious or philosophical beliefs, association with trade unions, genetic data, biometric data with the aim

of exclusively identifying a natural person, data concerning health or sexual life and/or the sexual orientation of a natural person.

The Subscriber is always provided with suitable and exhaustive informative, pursuant to art. 13 of the GDPR, at the time of the request for the issue of the digital certificate, about the possibility of choosing whether or not to provide his Personal Data but, in the event that he choose not to provide them, Uanataca will not be able to proceed with taking charge of the request and, therefore , will not be able to carry out the contractual relationship between the parties for the issue of the requested certificate.

#### **f) PURPOSE OF THE PROCESSING**

. The processing of the categories of Personal Data listed in the previous chapter is carried out by Uanataca, in the performance of its activities, for specific purposes, as better described below:

- **Purpose of the law:**
  - Identification of the subjects requesting the issuance of the qualified digital certificate;
  - Issue and management of qualified digital certificates;
  - Fulfillment of legal obligations (including tax and accounting obligations), Regulations, Community legislation as well as provisions of the Supervision Authority of the sector in the field of digital identity management;
- **Contractual Purposes:** ie. for the execution of any activity envisaged by the execution of contractual relationships established and established (Article 6 par. 1 letter b of the GDPR) between the Subscriber/Holder and Uanataca in order to allow the provision of the digital identity management service (issue, suspension and revocation); these activities include, by way of example but not limited to the following: any communications necessary for the correct management of the relationship between the QTSP and the Subscriber or Holder, management of any complaints and/or disputes.
- **Additional purposes:** only in cases where the interested party requests it or gives explicit consent to the processing, the Personal Data provided by this can be used by Uanataca for commercial purposes relating to its products and / or services, with the explicit exclusion of treatments involving profiling.

Furthermore, Uanataca may process the Personal Data acquired to carry out checks on the quality of the service and on the security of the system.

The Personal Data acquired by Uanataca will not be processed for purposes other than those described above or in a manner incompatible with them.

Uanataca informs interested parties that their Personal Data may be disclosed to public subjects and judicial authorities upon explicit request of the latter, in compliance with the applicable legal provisions and in order to prevent fraud and illegal activities.

#### **g) LEGAL BASIS OF THE PROCESSING**

The legal basis of the processing, pursuant to art. 13 co. 1 letter c) of the GDPR, is identified, as well as in the execution of the contractual relationship and request from Subscriber/Holder in the "*consent*" here understood as an unequivocal positive act with which the Subscriber/Holder expresses the free, specific, informed and unequivocal intention to accept the Personal Data Processing concerning him/her.

The expression of the consent by the interested party must always be freely expressed: the Subscribers are always adequately made aware of the Privacy Policy and all the rights connected to it, including the right to withdraw the consent already given or to oppose the Processing at any time.

Furthermore, the Personal Data Processing for contractual purposes is mandatory as it is necessary for taking charge of the request for the issue of the qualified certificate and for the subsequent provision of the required trust services.

Finally, the Personal Data Processing for the purposes of the law is mandatory as required pursuant to the laws, to the Regulations and to the applicable Community Regulations; any refusal by the Holder will not make it possible to use the products and services requested and made available by Uanataca.

This consent can be withdrawn at any time by contacting the management of Uanataca SA or the DPO at one of the contacts indicated above or at the addresses indicated on the Organization's website.

#### **h) STORAGE AND CANCELLATION OF PERSONAL DATA**

The User's Personal Data will be processed for the time necessary to fulfill the aforementioned purposes and, in particular, Uanataca will keep the data of the interested parties in a form that allows their identification for a period of time not exceeding the achievement of the purposes for which the data were collected. The Personal Data voluntarily provided by the Subscribers, relating to the Certificates and / or the Digital Identity, will be kept for 20 (twenty) years from the termination of the contract or from the expiration or revocation of the Certificate or the Digital Identity, in accordance with the provisions of the art. 28, co.4 bis of Legislative Decree 82/2005 and subsequent amendments of the Digital Administration Code and in accordance with the provisions of the art. 7, co.8 of the Prime Minister's Decree of 24 October 2014 and subsequent amendments.

The data strictly necessary for tax and accounting obligations, once the purpose for which they were collected has failed, will be kept for the period required by the relevant regulations. The service logs relating to the Certificates and / or the Digital Identity will be kept for a period equal to 6 (six) months in order to guarantee the correct identification of the flows of services.

After these periods, Uanataca will delete the Personal Data thus acquired.

#### **i) ANY RECIPIENTS OR CATEGORIES OF RECIPIENTS OF PERSONAL DATA**

For the purposes referred to in paragraph e), Uanataca may communicate the Data strictly necessary for each processing purpose, to the following categories of subjects: (i) staff in charge of the processing (e.g. staff of the CRM, IT, Retail Offices) ; (ii) professional and technical consultants and service providers (such as, for example, IT service providers, shipping service providers, legal consultants, etc.) and companies belonging to the Bit4 Group S.r.l., also located outside of the European Economic Area in the countries indicated on the site [www.bit4id.com](http://www.bit4id.com) (website of Bit4id S.r.l., a company belonging to the Bit4 Group S.r.l.) and to which they may be transferred in accordance with articles 45 and 46 of the GDPR; (iii) to public entities, banks, third parties involved in corporate and extraordinary transactions, to legitimate recipients. Personal data are never disclosed to third parties.

The data acquired through the identification and registration procedures can, therefore, be directly communicated and processed by the technological and instrumental partners which Uanataca uses to provide the requested services (including ADAM).

The data may also be processed by third parties as Registration Authority, Registration Operator, as well as subjects with paper and / or digital management and archiving function, formally appointed by Uanataca as external data processors / sub managers.

**j) PERSONAL DATA TRANSFER: EU AREA/ EXTRA EU AREA**

Without prejudice to the above, the Personal Data acquired by Uanataca may be freely transferred within the EU territory. However, if, for the purposes indicated, Uanataca needs to transfer such Data outside the European Union, to countries not considered adequate by the European Commission (e.g. United States), this will take the necessary measures to protect the Personal Data transferred, in compliance with legal guarantees, pursuant to applicable legislation and in particular articles 45 and 46 of the GDPR.

Interested parties have the right to obtain a copy of any data held abroad, outside the European Economic Area, and to obtain information about the place where such data are stored by making an express request to Uanataca to the contacts indicated in this statement.

• **RIGHTS OF THE INTERESTED PARTIES**

The Subscribers and all the persons concerned have the right to obtain an indication of the origin of the Personal Data, of the purposes and of the methods with which the latter are processed and of the logic applied in case of processing carried out with the aid of electronic instruments, thus such as the identification details of the Data Controller, of the representatives of the latter and of the subjects or categories of subjects to whom the Personal Data may be communicated or who can become aware about them.

In particular, the Subscriber or the Subject, pursuant to the GDPR, has the following rights:

1. **RIGHT TO ACCESS PERSONAL DATA:** pursuant to art. 15 of the GDPR (entitled "*Right of access by the data subject*"), the Subscriber or the Subject has the right to obtain from the Data Controller the confirmation that a Personal Data Processing concerning him or her is in progress and in this case, to obtain access to Personal Data in possession of this. The interested party can directly contact the DPO who will take charge of the request and provide a copy of all the Personal Data being processed. Although not expressly referred to herein, the provisions of art. 15 of the GDPR are applied.
2. **RIGHT TO RECTIFY PERSONAL DATA:** pursuant to art. 16 of the GDPR (entitled "*Right to rectification*") the Subscriber or the Subject has the right to obtain from the Data Controller the correction of inaccurate Personal Data concerning them; The interested party has the right to obtain the integration of incomplete personal data, also by providing an additional declaration, taking into account the purposes of the Processing.
3. **RIGHT TO CANCELLATION OF PERSONAL DATA:** pursuant to art. 17 of the GDPR (entitled "*Right of cancellation (\"right to be forgotten\")*") the Subscriber or the interested party has the right to obtain the cancellation of the Personal Data concerning them from the Data Controller; it will therefore be Uanataca's duty to delete, without undue delay, the Personal Data being processed, provided that the reasons set out in art. 17 co. 1 mentioned above are existing and save the application of paragraphs 2 and 3.
4. **RIGHT TO REQUEST A PROCESSING LIMITATION:** pursuant to art. 18 of the GDPR (entitled "*Right to restriction of Processing*"), the Subject has the right to obtain the limitation of the processing from the Data Controller in all the cases provided for by art. 18 co. 1 just mentioned. In the event that

the limitation of the processing takes place, the personal data subject to the limitation may be processed, except for storage, only with the consent of the Subject or for the assessment, exercise or defense of a right in court or to protect the rights of another natural or legal person or for reasons of significant public interest of the Union or of a Member State.

5. **RIGHT TO OBJECT:** pursuant to art. 20 of the GDPR (entitled "Right to object") the Subject has the right to object at any time, for reasons related to his particular situation, to the processing of personal data concerning him pursuant to article 6, paragraph 1, letters e) or f), including profiling based on these provisions. Following the manifestation of the interested party to want to exercise the right of opposition, the Data Controller refrains from further processing Personal Data unless he demonstrates the existence of binding legitimate reasons to proceed with the Processing that prevail over interests, rights and on the freedoms of the interested party or for the assessment, exercise or defense of a right in court. If Personal Data are processed for direct marketing purposes, the interested party has the right to object at any time to the Processing of Personal Data concerning him / her carried out for these purposes, including profiling to the extent that it is connected to such direct marketing. If the interested party objects to the processing for direct marketing purposes, the personal data are no longer processed for these purposes. Although not expressly referred to herein, the provisions of art. 21 of the GDPR.
6. **RIGHT TO DATA PORTABILITY:** pursuant to art. 20 of the GDPR (entitled "Right to data portability") the interested party has the right to receive the Personal Data concerning him / her provided to a Data Controller in a structured, commonly used and machine-readable format and has the right to transmit such Data to another Data Controller without hindrance by the Data Controller to which it has provided them in the cases provided for by co. 1 letter a) and b) of the aforementioned article. This right does not apply if the processing is necessary for the performance of a public interest task or connected to the exercise of public powers with which the Data Controller is invested.
7. **RIGHT TO WITHDRAW CONSENT ALREADY PROVIDED:** pursuant to articles 7 co. 3 and 13 co. 2 lett. c) of the GDPR, the interested party has the Operating Manual, made available to the Subscriber, the latter considers himself informed right to withdraw his consent already given at any time. The withdrawal of consent does not affect the lawfulness of the processing based on consent before the revocation. By reading this right.
8. **RIGHT TO OPPOSE PROFILING AND AUTOMATED PROCESSING:** according to the art. 22 the Subscriber or the interested party has the right not to be subjected to decisions based on automated processing, including profiling, which produce legal effects towards them or which have a similar impact on their person.
9. **RIGHT TO PROPOSE A COMPLAINT TO THE SUPERVISORY AUTHORITY:** pursuant to art. 77 of the GDPR, the interested party, who believes that the processing that concerns them violates the Regulation, can lodge a complaint with a supervisory authority located within the Member State in which he resides.

To exercise their rights, the interested parties can send a request directly to the Organization through the contact form or other addresses available on the website <https://web.uanataca.com/it/>. In this request, you must attach a copy of your identity document and clearly indicate which right you wish to exercise.

The information on the processing of personal data that takes place through the use of the contact forms on the Organization's website is published on the Uanatoca website.