

# Privacy Policy Arescosmo S.p.A.

Arescosmo S.p.A., within the scope of its activities and in full compliance with the principles for the protection of personal data established by Regulation (EU) 679/2016 (*GDPR legislation relating to the protection of individuals with regard to the processing of personal data, as well as the circulation of such data*), and in accordance with the national legislation in force and national transposition rules, as the "Data Controller" for the processing of personal information, it protects the personal data relating to its employees, those relating to the employees of its customers and the personal data of employees of the same suppliers.

About the personal information processed by the aforementioned subjects and by Arescosmo S.p.A. used as Data Controller, these are always freely granted to Arescosmo S.p.A. used by this in full compliance with the principles (pursuant to Article 5 of the GDPR Regulation) of: confidentiality, correctness, transparency and lawfulness towards the interested party, minimization of the data processed, updating of the purposes of processing and storage, finally, guaranteeing the accuracy and update of the data processed (including deletion).

Being Arescosmo S.p.A. a company operating in the defense and space business, with UNI EN ISO 9100:2018 e UNI EN ISO 14001:2015 certification, pays great attention to the confidentiality and integrity of business data, giving also great value, as required by the GDPR 2016 regulation, to the confidentiality and integrity of the personal information of its employees, customers, and personal data relating to the employees of their suppliers, also extending technical security and protection measures to them, to guarantee the data processed and therefore not only limited to the information security management systems regarding business data.

To the privacy rights of the its employees, customers and suppliers, Arescosmo S.p.A. as far as possible, it uses official communication channels shared on company's websites.

## **METHODS OF PROCESSING THE DATA:**

Arescosmo S.p.A. manages its data processing electronically and on paper adopting the appropriate measures aimed to preventing unauthorized access, disclosure, modification or destruction of Personal Data.

About the specific case of information processed by e-mail in the context of the performance of the company, pursuant to the General Data Protection Regulation - EU 2016/679, and in application of the "guidelines of the Guarantor by e-mail and internet" of the Data Protection Authority of 1 March 2007, paragraph 5.2 letter b), Arescosmo S.p.A. may make them known or circulate them inside their company, while the information sent is reserved for the exclusive use of the recipient. In the event of

a message sent to a wrong recipient, Arescosmo S.p.A. imposes the obligation to delete this without making any copies informing Arescosmo S.p.A. about this instantaneously.

### **MODE OF PROCESSING, PURPOSES AND LEGAL BASIS:**

The personal data collected by Arescosmo S.p.A. performing its business, are processed as follows

- Administrative management of the relationships with customers and supplier:
  - Users: employees of our customers and suppliers.
  - Type of data: personal data, email and telephone contact.
  - Purpose: administrative management.
  - Legal basis: administrative and accounting fulfillment of specific obligations deriving from national and community legislation.
  - Retention period: 10 years..
  
- Web site:
  - Users di dati trattati: personal data, name of the company, mail.
  - Purpose: execution and performance of pre-contractual and after-sales activities.
  - Legal basis: administrative and accounting fulfilment of specific obligations deriving from national and community legislation
  - Retention period: 3 years.
  
- Training:
  - Users: external teachers and internal teachers of Arescosmo S.p.A.
  - Type of data processed: low-value identifiers (in particular: personal data, email, curriculum vitae and telephone contact).
  - Purpose: training courses.
  - Legal basis: Contractual, legal and administrative obligations.
  - Extra-UE transfer: sharing the teacher's CV is required (for the organization of Extra-UE courses).
  - Retention period: maximum 10 years from the closure of the contractual relationship..
  
- Recruiting (also through the website and LinkedIn platform, <https://www.arescosmo.it>)
  - Users: candidates for recruitment.
  - Type of data processed: low-value identification data (in particular: name, surname, place and date of birth, residential address, tax code, marital status, contacts: telephone number, e-mail address, skype contact); sensitive data (in particular: protected categories).
  - Purpose: Selection and hiring of new staff.
  - Legal basis: consent of the users.
  - Retention period: 3 years.

### **ACCESS TO THE DATA**

Following the above purposes, we may share your data to:

- employees and / or collaborators of the Data Controller, in their capacity as persons in charge of the processing and / or internal managers of the processing and / or system administrators;

- third-party companies or other subjects (for example, labor consultants, etc.) who carry out outsourced activities on behalf of the Data Controller, in their capacity as external data processors.

### **COMMUNICATION OF THE DATA**

Your data may be disclosed, even without your consent, to supervisory bodies, law enforcement agencies or the judiciary, the Ministry of Finance, the Revenue Agency, ministerial bodies and competent authorities, local bodies (regions, provinces, municipalities), tax commissions, regional and provincial, following their express request. They will manage these information as independent data controllers for institutional purposes and / or in accordance with the law during the investigations and checks.

Your data may also be disclosed to third parties (for example: partners, freelancers or service companies for business administration and management who operate on behalf of our company, competent doctor and medical offices for clinical analyses, fulfilling the obligations in health and safety in the workplace, insurance companies and credit institutions, trade union organizations already mandate by you, etc.), as independent owners of the data processing, performing the activities related to the above purposes.

### **DATA TRANSFER**

The Data will not be disseminated or transferred for the above purposes to Extra-UE countries.

With regards to the teaching staff of Arescosmo S.p.A. who deals with training abroad, in case of sharing the profile and CV to the companies to whom the training is provided, any possible transfer to Extra-UE countries will take place in accordance with the provisions contained in Chapter V, GDPR (pursuant to art.46).

### **NATURE OF THE DATA COLLECTED – REFUSAL TO ANSWER – CONSEQUENCES**

The data concession is mandatory for contractual purposes: these data are necessary for the relationship with the owner. However, you can refuse to provide the Data, but in this case you won't be able to establish or continue the contractual relationship with the Data Controller.

### **USERS' RIGHTS**

Pursuant to European Regulation 679/2016 (GDPR) and national legislation, interested parties can exercise their rights at any time by contacting the data controller and / or the manager designated by Arescosmo S.p.A. to the dedicated email address [privacy@arescosmo.it](mailto:privacy@arescosmo.it), taking into account the limits provided by the current legislation for the processing of personal data. According to the current legislation, the user has the right to:

- ask for confirmation of the existence of his personal data (access right);
- ask for the origin;
- receive intelligible communication;
- have information about the logic, methods and purposes of the processing;
- request the updating, rectification, integration, cancellation, transformation into anonymous form, blocking of data processed in violation of the law, including those no longer necessary for the purposes for which they were collected;

- in cases of consent-based processing, receive their data provided to the owner, in a structured and readable form by a data processor and in a common format used by an electronic device;
- the right to revoke an appeal to the supervisory authority;

### **HOW TO EXERCISE YOUR RIGHTS:**

You can exercise your rights anytime:

- by sending a mail to the Data Controller address;
- by sending an email to [privacy@arescosmo.it](mailto:privacy@arescosmo.it)
- by calling the phone numbers: Tel +39-06 920161.

### **OWNER AND DATA CONTROLLER:**

- Arescosmo S.p.A., VAT number 01343690598;
- Address: Via delle Valli 46, PO Box 106, 04011 Aprilia (LT) – Italia
- Tel +39-06 920161
- Email address: [privacy@arescosmo.it](mailto:privacy@arescosmo.it)