



[PRIVACY POLICY](#)

Version no. 2 – 02.09.2022

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## 1 GENERAL ASPECTS

### 1.1 Purpose of the document

This document defines the principles adopted by Integrae SIM to ensure compliance with the legal and regulatory provisions currently in force regarding the protection of personal data. By browsing the website [www.integraesim.it](http://www.integraesim.it) and expressly consenting where necessary, you agree to be bound by this privacy policy.

Definitions:

- Processing: any operation or set of operations, carried out with or without the aid of automated processes and applied to personal data or sets of personal data, such as collection, recording, organization, structuring, storage, adaptation or modification, extraction, consultation, use, communication by transmission, dissemination, or any other form of making available, comparison or interconnection, restriction, deletion or destruction.
- Personal data: any information concerning an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more characteristic elements of his or her physical, physiological, genetic, mental, economic, cultural or social identity.

### 1.2 Purpose and content

This Policy identifies the purposes of the management of personal data processed on the company website and outlines the organizational methods adopted by SIM.

### 1.3 Regulatory references

The external regulatory sources are:

- Legislative Decree no. 196 of 30 June 2003, Personal Data Protection Code
- EU Regulation 2016/679 on Data Protection Regulation

## 2 ADDRESSEES

The main recipients of this Policy are Internet users [www.integraesim.it](http://www.integraesim.it)

### 3 APPROVAL, UPDATING AND DISTRIBUTION OF THE DOCUMENT

This Policy has been defined by the Data Controller.

This Policy is made available through publication on the company website.

### 4 ROLES AND RESPONSIBILITIES

#### 4.1 The Data Controller

Company name: Integrae SIM S.p.A.

Address Piazza Castello, 24 20121 Milan

VAT and Tax Code 02931180364

Telephone +39 02 96 84 68 64

E-mail: info@integraesim.it

#### 4.2 Contact Data of the Data Protection Officer - DPO

E-mail: dpo@ambientelavorosalute.com

### 5 SUBJECT MATTER, PURPOSE, AND LEGAL BASIS OF THE PROCESSING

#### 5.1 Browsing data

The computer systems and software procedures used to operate the website acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols.

This is data of the following types: IP addresses, the type of browser used, and other parameters related to the operating system and computer environment of the user.

The processing of personal data is legitimate as necessary to provide access to and navigation of the site pursuant to art. 6 paragraph 1 letter B and C of EU Regulation 2016/679 on Data Protection.

Refusal of this processing means that Integrae SIM is unable to complete the service.

### 6 RECIPIENTS OF PERSONAL DATA

Personal Data may be made accessible, for the purposes mentioned above or in compliance with legal obligations or for carrying out activities instrumental to the aforementioned purposes, in addition to Autonomous Data Controllers to two other categories of subjects:

- to the Data Controller's workers, specifically appointed and authorized for this purpose, also as data processors, for specific processing;
- to third-party companies or other third parties that carry out outsourced activities on behalf of the Data Controller, in their capacity as external Data Processors, specifically appointed and authorized for specific processing.

The agreements signed with these subjects are aimed at allowing only the indispensable processing and to guarantee the confidentiality, security, and integrity of the data.

Categories of External Processors who may be appointed:

- subjects who carry out technical, organizational, professional, and operational services on behalf of the Data Controller to achieve the declared purposes.
- subjects who carry out IT, legal, administrative – accounting, financial and insurance services, technical and managerial consultancy, verification, control, and audit on behalf of the Data Controller to support the achievement of the declared purposes.
- subjects who carry out commercial and marketing services on behalf of the Data Controller in compliance

With the limits and constraints set out in the preceding paragraphs.

Personal Data may be transferred to Independent Data Controllers such as Banks, Insurance, and Public Supervisory or Supervisory Authorities.

## 7 PERSONAL DATA PROCESSING TOOLS AND LOGICS

In relation to the purposes mentioned here, the processing takes place through manual, IT, and telematic tools with logic strictly related to the aforementioned purposes and, in any case, in order to guarantee the security and confidentiality of the data themselves.

## 8 STORAGE PERIOD OF PERSONAL DATA

The data is kept for 10 years from the termination of the relationship or, in the event of regulatory changes or jurisprudential guidance until storage is necessary to assert a right of both parties. A periodic check is carried out on the obsolescence of the data.

## 9 RIGHTS OF DATA SUBJECTS

All the rights mentioned below may be exercised through the contact details of the data controller expressed at the beginning of paragraph 1:

- the right to ask the data controller for access to your personal data
- the right to request the data controller to rectify /erase /restrict your personal data
- the right to request the data controller to object to the processing of your personal data
- the right to receive the complete list of data controllers
- the right to receive your personal data stored in a structured, commonly used, and legible format
- the right to lodge a complaint with a Supervisory Authority such as the Privacy Guarantor to the contact details listed at the following link:  
<https://www.garanteprivacy.it/home/footer/contatti>

There is no automated decision-making process, including profiling referred to in Article 22 (1) and (4) of the European Privacy Regulation 2016/679

## 10 EXTERNAL DATA TRANSFER

No data transfers are made outside the EU.

*This information may undergo changes and additions over time, so we suggest you check it periodically. In particular, in the case of long-term relationships, the SIM will take all necessary measures to promptly inform the changes made.*