



CONCISE INFORMATION ON THE PROCESSING OF PERSONAL DATA
IN ACCORDANCE WITH ART. 13-14 OF EU REGULATION 2016/679 (GDPR).

According to law, treatment will be based on principles of correctness, lawfulness, transparency and protection of your privacy and your rights.

Data Controller

The Data Controller is Commify Italia S.p.A., with registered office in 20121 Milan, Via Montenapoleone, 29 (hereinafter, for the sake of brevity, the “**Controller**” or the “**Company**”).

Data Types

Personal Data (name, surname, telephone number, email address, etc.) will be given at the time the Service Contract is signed.

The Navigation Data and data collected from the skebbly.com website (IP address or browser type, domain name, time of request, 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 (good order, error, etc.) and other parameters related to your operating system and IT environment) are used for the sole purpose of obtaining anonymous statistical information on the use of the site and check its correct functioning, and are deleted immediately after processing; the Data could be used to ascertain responsibility in case of hypothetical IT crimes damaging the site.

In the framework of the provision of the Services, the Company appointed as Responsible for the Treatment by the Customer, processes the Personal Data of the persons to whom the Customer transmits an SMS or email message, such as address records (physical address or registered office), email addresses, and/or mobile telephone numbers. Any information or Personal Data

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relating to parties with whom the Company has no relationship, and content in the text of SMS or email messages sent through the Platform (“**Third Party Data**”), are treated as Data Related to Traffic only to the extent and for the purposes referred to in articles 122, 123, and 132 of the Privacy Code and on the basis of the express consent required by the signing of the contract with the Customer.

Purpose of the Treatment

The data provided will be processed for the following purposes:

1. For carrying out the reporting activities as provided for by the Contract such as:
 - a. concluding, managing and executing contact requests or service provision;
 - b. organizing, managing and executing requests for contact and provision of services also through communication to third parties in general, including suppliers and / or collaborators and / or subsidiaries and / or affiliates for the purpose of providing services and / or for defense of the rights and / or in fulfillment of the obligations foreseen by the law or by regulations, and upon request by the competent Authorities;
2. For the management of the administration and fulfillment of legal obligations (eg. accounting, tax), or to comply with requests of the Judicial Authority;
3. To receive advertising and promotional communications, take advantage of discounts, gifts and exclusive offers, only if you with specific consent to the processing of Personal Data for these purposes.

Provision of Data

The provision of data is mandatory and the failure, partial or incorrect conferment may have, as a consequence, the impossibility of fulfilling the contractual obligations and the provision of services.

Processing Mode

The processing is carried out with manual and / or computerized and telematic tools with organizational and processing logics strictly related to the purposes themselves, and in any case in order to guarantee the security, integrity and confidentiality of the data in compliance with organizational, physical and logics required by current regulations.

Data Transfer

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The transfer of Data for the provision of the Services is a **necessary requirement** for the performance of the contract, and failure to transfer, or partial or incorrect transfer of, Data will consequently render impossible the fulfilment of contractual obligations and the performance of the Services.

Storage Of Data

Data processing and storage are carried out on servers located within the European Union, also in third-party companies.

Personal Data is stored in such a way as to allow identification of the Data Subject for a period of time not exceeding the achievement of the purposes for which it is processed and, in the case of revocation of the consent, will be deleted.

Information related to traffic is retained in compliance with the express consent granted under the contract for a period not exceeding 24 months for the purposes of:

- a. the investigation and prosecution of offences;
- b. documentation in the case of dispute of an invoice or claim for payment including in a court of law;
- c. the marketing of electronic communications services or the provision of value-added services;
- d. consultation on the part of the Customer or End-Customers;
- e. internal organisational purposes, maintenance, and statistical surveys, in addition to complying with such requests for delivery and/or viewing of the data as may be submitted by authorised persons such as, but not limited to, administrative or judicial authorities or public security forces.

The contents of SMS and e-mails are kept in accordance with the express consent given with the contract for a period of no more than 6 months for consultation by the customer, by accessing the website by means of appropriate login and password or through the *customer care* telephone service.

In order to prevent and combat Fraudulent Transactions such as *spamming* (the recipient receives an unsolicited SMS), *phishing* (obtaining access to personal or confidential financial information, using access codes for fraud and/or scams, through electronic communications), *faking* (SMS messages or emails transmitted under a false identity with the intent to deceive the recipient - undue and unauthorized use of a numeric or alphanumeric identification code of which the real owner is unaware), *flooding* (sending a large number of SMS messages to the same recipient), *mailbombing* (sending a large number of emails to the same recipient) or equivalent actions and, in general, any sending, via SMS and/or email, of unauthorised, unsolicited communications and/or not solicited by the recipients, Commify Italia reserves the right to submit the transmitted

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SMS messages and emails to pre-analysis systems using detection algorithms (URL, domain, keywords). In all cases in which Commify Italia believes or fears that Fraudulent Transactions are being planned or committed, Commify Italia will suspend the Service immediately, without prior notice, communicating the reasons for the suspension.

Rights of the interested party

You can, at any time, exercise the rights:

1. access to personal data;
2. to obtain the correction or cancellation of the same, or the limitation of the processing that concerns them;
3. to oppose the treatment;
4. to the portability of data;
5. to revoke consent, where provided: the withdrawal of consent does not affect the lawfulness of the treatment based on the consent given before the revocation;
6. to propose a complaint to the supervisory authority (Privacy Guarantor).

Minors

If you are under the age of 18, the Processing is lawful only if and to the extent that the consent is given or authorized with parental responsibility, for which the identification data and copy of the identification documents must be acquired.

Contact information

The exercise of your rights as well as information and privacy requests may be addressed to the Controller by e-mail to the address info-italy@commify.com.

The person responsible for Data Protection is Cristiano Bertazzoni, who can be contacted at dpo-italy@commify.com.

The complete privacy policy is available here:

[Personal Data Processing Policy](#).

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| I HAVE VIEWED THE DISCLOSURE AND AUTHORISE THE HANDLING OF MY DATA FOR THE AIMS INDICATED |
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Updated December 2018