Privacy Policy for the users/visitors of the site www.cso.it (hereinafter the “Site”)

1. INTRODUCTION

The following Privacy Policy is aimed at describing the site that can be found at the internet address www.csoitalia.it (hereinafter the “Site”) management procedures in relation to the users/visitors personal data treatment. The following Privacy Policy is published according to Article 13 of the Eu Regulation 2016/679 – for the users of the Site. The Site is property of CSO S.r.l., with registered office in Scandicci (Firenze), Via degli Stagnacci 12/E (hereinafter “CSO”). The following report is published by CSO only in relationship to the Site and not in relation to other sites or sections/pages/spaces which are property of third parties which the user has visited through particular links found in the Site.

CSO guarantees the respect of the Eu Regulation and the Italian law in relation to personal data protection. The users/visitors are invited to read carefully the following Privacy Policy before sending any personal data and/or filling out any electronic forms found in the Site.

2. DEFINITIONS ACCORDING TO THE ARTICLE 4 OF THE EU REGULATION 2016/679

«personal data»: means any information relating to 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 factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

«processing»: means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

«restriction of processing»: means the marking of stored personal data with the aim of limiting their processing in the future;

«profiling»: means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyze or predict aspects concerning that natural person’s performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements;

«pseudonymization»: means the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organizational measures to ensure that the personal data are not attributed to an identified or identifiable natural person;

«filing systems»: means any structured set of personal data which are accessible according to specific criteria, whether centralised, decentralised or dispersed on a functional or geographical basis;

«controller»: means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;

«processor»: means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

«recipient»: means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which have received the personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;

«third party»: means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data;

«consent»: of the data subject means any freely given, specific, informed and unambiguous indication of the data subject’s wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;

«personal data breach»: means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed;
«genetic data»: means personal data relating to the inherited or acquired genetic characteristics of a natural person which give unique information about the physiology or the health of that natural person and which result, in particular, from an analysis of a biological sample from the natural person in question;

«biometric data»: means personal data resulting from specific technical processing relating to the physical, physiological or behavioural characteristics of a natural person, which allow or confirm the unique identification of that natural person, such as facial images or dactyloscopic data;

«data concerning health»: means personal data related to the physical or mental health of a natural person, including the provision of health care services, which reveal information about his or her health status;

«representative»: means a natural or legal person established in the Union who, designated by the controller or processor in writing pursuant to Article 27, represents the controller or processor with regard to their respective obligations under this Regulation.

For other definitions please read the Article 4 of the Eu Regulation 2016/679.

3. TYPOLOGY OF TREATED DATA AND SCOPE OF THE TREATMENT

I. Navigation data. The computer systems and the software procedures used for the Site functioning acquire, in the standard activity and in the respect of the treatment methods and of the data requirements according to the Eu Regulation 2016/679, some personal data which are sent implicitly in the Internet for communication protocols use. These are data which by nature, through associations or elaborations with data in property of third parties, could identify the user/visitor (for instance, IP addresses, domain names, used by the users/visitors connected to the Site, etc., so-called “identification data”). These data are used only with the aim of obtaining statistical information (so anonymous) and for controlling the correct Site functioning. Immediately after the elaboration, said data are deleted. The data concerning the web contacts are stored, for no more than seven days - a time span strictly necessary that respects the Eu Regulation 2016/679 - in a database only available to the treatment owner, except in the case of investigations by the competent Authorities concerning computer crimes damaging said Site. Any data coming from the web service will not be communicated or published, except in case of fulfillment of duties provided in laws, regulations or provisions.

II. Data voluntarily given by the users/visitors (so-called “data subjects”). In case the users/visitors, connecting to the Site send their own personal data to access services or to send requests by email, this data will be acquired by CSO and/or third parties with whom CSO may provide the service requested by the user/visitor; this data will be treated exclusively in response to the request, or to provide the service according to this privacy policy and the laws in force. In particular, the user account and profile data, necessary for the access to the services subjected to the user registration, will be treated and stored for the time strictly necessary in order to consent the provision of those services. The personal data expressly sent by the users/visitors will be communicated to third parties only in case said communication is necessary to satisfy the requests of the users/visitors and for the provision of the services, and in order to fulfill duties provided by law.

III. Cookie. The Site uses cookies or markers, which technically are information packages sent by a web server (in this case, from the Site) to the visitor/user’s internet browser and by this one automatically saved in the personal computer/device and automatically sent back at the time the user accesses the Site. Therefore, for a complete use of the Site, it is recommended to accept the reception of cookies. We inform you that the defaults of nearly all web browsers are set up for accepting cookies automatically. The visitors/users can modify definitively disable cookies modifying the default setup following the instructions that appear at the moment of the connection to the Site on the head of the page, or deleting cookies in the personal computer/device by accessing to from “Control Panel” “to “Network and internet settings”, “Internet Options”, “General”, clicking bottom “Delete” in the section “Browsing history”, finally choosing “cookies and website data”.

As hereinbefore described, however, the disapplication or the deletion of cookies could preclude the successful use of some of the Site areas or compromise the use of the services under authentication. Lasting cookies are used in order to simplify the navigation in the Site and its correct use, to simplify access to the services which require the authentication (avoiding that users send elements of authentication every time they access to the services) and for statistical aims in order to know which Site areas have been visited, and, in certain cases, for an optimal management of the pages and of the advertisement spaces or to provide contents and advertisements according to net surfers’ choices.

The cookies relative to each session are used in order to send the session identification elements which are necessary to permit a safe and efficient exploration of the Site. The cookies relative to each session used in the Site avoid the use of other computer methods potentially dangerous for the privacy of users/visitors navigation and are used even for improving the provision of the services. Furthermore, cookies can be peculiar to the Site (for instance, used in order to know the number
of pages visited within the Site) or belonging to third parties (meaning they can be made by other sites to provide the content of the site visited).

4. TREATMENT METHODS AND SECURITY

The treatment is done through automatized tools (for instance using electronic procedures and supports) and/or manually (for instance on a paper support) for the time strictly necessary to achieve the aims which the data has been collected for and, anyway, in compliance with the laws ruling this field. This electronic and paper supports are stored in the CSO offices or in the offices of other people in charge for the data treatment with passwords or other means that guarantees the security of such data.

5. OPTIONAL DATA.

Except what is provided for navigation data, the users/visitors may elect to provide or not provide their personal data. If not provided or if the user do not consent to his personal data treatment it leads only the impossibility to obtain the requested services for which the personal data provision and treatment is necessary.

6. CONTROLLER, RESPONSIBLE AND DATA SUBJECTS TYPOLOGIES

The controller is CSO, with registered office is in Scandicci (Firenze), Via degli Stagnacci 12/E.

A detailed list of the processors and the people in charge for personal data treatments and the treatments is deposited at CSO’s registered office and can be known by the user writing to cso@csoitalia.it.

In the company user’s data will be treated by the employees, under the direct authority of the processors for the treatment. As well as the CSO employees the personal data treatment can be handled even by third parties, to whom CSO assign activities connected to or instrumental for the execution of the treatments or for the provision of the offered services (or parts of them). In this case those will work as independent controllers, co-controllers or will be appointed as processors or people in charge of the treatment.

7. RIGHTS OF THE DATA SUBJECTS

According to Articles 12 and followings of the EU Regulation 2016/679, the data subjects have some rights in relation their personal data treatments.

Article 12 - Transparent information, communication and modalities for the exercise of the rights of the data subject

1. The controller shall take appropriate measures to provide any information referred to in Articles 13 and 14 and any communication under Articles 15 to 22 and 34 relating to processing to the data subject in a concise, transparent, intelligible and easily accessible form, using clear and plain language, in particular for any information addressed specifically to a child. The information shall be provided in writing, or by other means, including, where appropriate, by electronic means. When requested by the data subject, the information may be provided orally, provided that the identity of the data subject is proven by other means.

2. The controller shall facilitate the exercise of data subject rights under Articles 15 to 22. In the cases referred to in Article 11(2), the controller shall not refuse to act on the request of the data subject for exercising his or her rights under Articles 15 to 22, unless the controller demonstrates that it is not in a position to identify the data subject.

3. The controller shall provide information on action taken on a request under Articles 15 to 22 to the data subject without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. The controller shall inform the data subject of any such extension within one month of receipt of the request, together with the reasons for the delay. Where the data subject makes the request by electronic form means, the information shall be provided by electronic means where possible, unless otherwise requested by the data subject.

4. If the controller does not take action on the request of the data subject, the controller shall inform the data subject without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

5. Information provided under Articles 13 and 14 and any communication and any actions taken under Articles 15 to 22 and 34 shall be provided free of charge. Where requests from a data subject are manifestly unfounded or excessive, in particular because of their repetitive character, the controller may either:

(a) charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested; or

(b) refuse to act on the request.

The controller shall bear the burden of demonstrating the manifestly unfounded or excessive character of the request.

6. Without prejudice to Article 11, where the controller has reasonable doubts concerning the identity of the natural person making the request referred to in Articles 15 to 21, the controller may request the provision of additional information necessary to confirm the identity of the data subject.

7. The information to be provided to data subjects pursuant to Articles 13 and 14 may be provided in combination with standardised icons in order to give in an easily visible, intelligible and
1. Where personal data relating to a data subject are collected from the data subject providing standardised icons, information to be presented by the icons and the procedures for determining the significance and the envisaged consequences of such processing for the data subject.

2. In addition to the information referred to in paragraph 1, the controller shall, at the time when personal data are obtained, provide the data subject with all of the following information:

(a) the identity and the contact details of the controller and, where applicable, of the controller’s representative;
(b) the contact details of the data protection officer, where applicable;
(c) the purposes of the processing for which the personal data are intended as well as the legal basis for the processing;
(d) where the processing is based on point (f) of Article 6(1), the legitimate interests pursued by the controller or by a third party;
(e) the recipients or categories of recipients of the personal data, if any;
(f) where applicable, the fact that the controller intends to transfer personal data to a third country or international organization and the existence or absence of an adequacy decision by the Commission, or in the case of transfers referred to in Article 46 or 47, or the second subparagraph of Article 49(1), reference to the appropriate or suitable safeguards and the means by which to obtain a copy of them or where they have been made available.

2. Where the controller intends to further process the personal data for a purpose other than that for which the personal data were collected, the controller shall provide the data subject prior to that further processing with information on that other purpose and with any relevant further information as referred to in paragraph 2.

4. Paragraphs 1, 2 and 3 shall not apply where and insofar as the data subject already has the information.

8. The Commission shall be empowered to adopt delegated acts in accordance with Article 92 for the purpose of determining the information to be presented by the icons and the procedures for providing standardised icons.

Article 13 - Information to be provided where personal data are collected from the data subject

1. Where personal data relating to a data subject are collected from the data subject, the controller shall, at the time when personal data are obtained, provide the data subject with all of the following information:

(a) the identity and the contact details of the controller and, where applicable, of the controller’s representative;
(b) the contact details of the data protection officer, where applicable;
(c) the purposes of the processing for which the personal data are intended as well as the legal basis for the processing;
(d) where the processing is based on point (f) of Article 6(1), the legitimate interests pursued by the controller or by a third party;
(e) the recipients or categories of recipients of the personal data, if any;
(f) where applicable, the fact that the controller intends to transfer personal data to a third country or international organization and the existence or absence of an adequacy decision by the Commission, or in the case of transfers referred to in Article 46 or 47, or the second subparagraph of Article 49(1), reference to the appropriate or suitable safeguards and the means by which to obtain a copy of them or where they have been made available.

2. In addition to the information referred to in paragraph 1, the controller shall, at the time when personal data are obtained, provide the data subject with the following further information necessary to ensure fair and transparent processing:

(a) the period for which the personal data will be stored, or if that is not possible, the criteria used to determine that period;
(b) the existence of the right to request from the controller access to and rectification or erasure of personal data or restriction of processing concerning the data subject or to object to processing as well as the right to data portability;
(c) where the processing is based on point (a) of Article 6(1) or point (a) of Article 9(2), the existence of the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
(d) the right to lodge a complaint with a supervisory authority;
(e) whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether the data subject is obliged to provide the personal data and of the possible consequences of failure to provide such data;
(f) the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.
1. The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

3. The controller shall provide the information referred to in paragraphs 1 and 2:
   (a) within a reasonable period after obtaining the personal data, but at the latest within one month, having regard to the specific circumstances in which the personal data are processed;
   (b) if the personal data are to be used for communication with the data subject, at the latest at the time of the first communication to that data subject; or
   (c) if a disclosure to another recipient is envisaged, at the latest when the personal data are first disclosed.

4. Where the controller intends to further process the personal data for a purpose other than that for which the personal data were obtained, the controller shall provide the data subject prior to that further processing with information on that other purpose and with any relevant further information as referred to in paragraph 2.

5. Paragraphs 1 to 4 shall not apply where and insofar as:
   (a) the data subject already has the information;
   (b) the provision of such information proves impossible or would involve a disproportionate effort, in particular for processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, subject to the conditions and safeguards referred to in Article 89(1) or in so far as the obligation referred to in paragraph 1 of this Article is likely to render impossible or seriously impair the achievement of the objectives of that processing. In such cases the controller shall take appropriate measures to protect the data subject’s rights and freedoms and legitimate interests, including making the information publicly available;
   (c) obtaining or disclosure is expressly laid down by Union or Member State law to which the controller is subject and which provides appropriate measures to protect the data subject’s legitimate interests; or
   (d) where the personal data must remain confidential subject to an obligation of professional secrecy regulated by Union or Member State law, including a statutory obligation of secrecy.

Article 15 - Right of access by the data subject

“1. The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information:
   (a) the purposes of the processing;
   (b) the categories of personal data concerned;
   (c) the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations;
   (d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
   (e) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
   (f) the right to lodge a complaint with a supervisory authority;
   (g) where the personal data are not collected from the data subject, any available information as to their source;
   (h) the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

2. Where personal data are transferred to a third country or to an international organization, the data subject shall have the right to be informed of the appropriate safeguards pursuant to Article 46 relating to the transfer.

3. The controller shall provide a copy of the personal data undergoing processing. For any further copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs. Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form.

4. The right to obtain a copy referred to in paragraph 3 shall not adversely affect the rights and freedoms of others.”

Article 16 - Right to rectification

“The data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.”

Article 17 - Right to erasure (‘right to be forgotten’)
1. The data subject shall have the right to obtain from the controller restriction of processing where one of the following applies:
(a) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
(b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
(c) the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defense of legal claims;
(d) the data subject has objected to processing pursuant to Article 21(1) pending the verification whether the legitimate grounds of the controller override those of the data subject.
2. Where processing has been restricted under paragraph 1, such personal data shall, with the exception of storage, only be processed with the data subject’s consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.
3. A data subject who has obtained restriction of processing pursuant to paragraph 1 shall be informed by the controller before the restriction of processing is lifted”.

Article 19 - Notification obligation regarding rectification or erasure of personal data or restriction of processing

“The controller shall communicate any rectification or erasure of personal data or restriction of processing carried out in accordance with Article 16, Article 17(1) and Article 18 to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The controller shall inform the data subject about those recipients if the data subject requests it”.

Article 20 - Right to data portability

“1. The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where:
(a) the processing is based on consent pursuant to point (a) of Article 6(1) or point (a) of Article 9(2) or on a contract pursuant to point (b) of Article 6(1); and
(b) the processing is carried out by automated means.
2. In exercising his or her right to data portability pursuant to paragraph 1, the data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.
3. The exercise of the right referred to in paragraph 1 of this Article shall be without prejudice to Article 17. That right shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.
4. The right referred to in paragraph 1 shall not adversely affect the rights and freedoms of others”.

Article 21 - Right to object

“1. The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on point (e) or (f) of Article 6(1), including profiling based on those provisions. The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defense of
legal claims.

2. Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing.

3. Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

4. At the latest at the time of the first communication with the data subject, the right referred to in paragraphs 1 and 2 shall be explicitly brought to the attention of the data subject and shall be presented clearly and separately from any other information.

5. In the context of the use of information society services, and notwithstanding Directive 2002/58/EC, the data subject may exercise his or her right to object by automated means using technical specifications.

6. Where personal data are processed for scientific or historical research purposes or statistical purposes pursuant to Article 89(1), the data subject, on grounds relating to his or her particular situation, shall have the right to object to processing of personal data concerning him or her, unless the processing is necessary for the performance of a task carried out for reasons of public interest”.

8. AUTOMATED INDIVIDUAL DECISION-MAKING, INCLUDING PROFILING

According to Article 22:

“1. The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.

2. Paragraph 1 shall not apply if the decision:
   (a) is necessary for entering into, or performance of, a contract between the data subject and a data controller;
   (b) is authorized by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard the data subject’s rights and freedoms and legitimate interests; or
   (c) is based on the data subject’s explicit consent.

3. In the cases referred to in points (a) and (c) of paragraph 2, the data controller shall implement suitable measures to safeguard the data subject’s rights and freedoms and legitimate interests, at least the right to obtain human intervention on the part of the controller, to express his or her point of view and to contest the decision.

4. Decisions referred to in paragraph 2 shall not be based on special categories of personal data referred to in Article 9(1), unless point (a) or (g) of Article 9(2) applies and suitable measures to safeguard the data subject’s rights and freedoms and legitimate interests are in place. 8. Amendments to the privacy policy

The above described privacy policy can be amended even in connection to the becoming in force of new laws ruling the field, the improvement or the provision of new services or the upcoming of technological innovations. For this reason it is recommended that the user/visitor consults this page periodically”.

For any communication, information or for the exercise of the illustrated rights, the data subjects can contact CSO at the following addresses:

Ordinary mail:
CSO Srl
Via degli Stagnacci 12/E
50018 Scandicci (Firenze)
email. cso@csoitalia.it | tel. +39 055 721557