



## INFORMATION TO CUSTOMERS ON PERSONAL DATA PROCESSING

### **Esteemed Customer:**

The regulation 2016/679 GDPR (General Data Protection Regulation) is in force in all the Member States of the European Union. This company, as Controller having the responsibility to decide on purpose and modality of personal data processing and the instruments to use, including security management, is required to inform its Customers about the processing of their own data.

Controller:	<b>S.A.T.A. Applicazione Tecnologie Avanzate Srl</b>
Registered office:	<b>Via G. Notari 103, 41126 Modena (MO)</b>
Telephone, email:	<b>+39-059-343299, <a href="mailto:privacy@satonet.it">privacy@satonet.it</a></b>
Short name:	<b>SATA</b>

### *Personal data, processing purpose*

Of each Customer, the Controller uses company data (business name, VAT code, bank account, and so on), identification and contact data of the relative users (name and surname, tax code, email address and so on), as well as other data required to process its documents (tax regime, responsible for legal archiving, and so on). SATA may occasionally come to know the contents of certain processed documents when they present particular anomalies requiring a manual intervention to complete the process.

Data processing pursues the following objectives:

- Conclude and perform the contractual relation.
- Fulfil the obligations laid down in the applicable norms.
- Inform on possible changes and evolutions of the provided services.

### *Processing modality*

The Customer data are processed by means of cloud-based computer procedures performed by SATA-owned software platforms. As said above, it may occasionally occur to carry out manual interventions on documents discarded by the automatic process: this is done by the internal SATA personnel or by service companies to that purpose specifically appointed and committed to privacy.

The Customer data are processed on computer systems dynamically hired at highly-qualified server farms, located in Europe and provided with the most advanced access protection and security techniques. The Customer personal data are not submitted to automatic decisional processes nor natural persons are profiled according to Article 22, paragraphs 1 and 4, of the European Regulation.

### *Data provision*

The provision by the Customer of the said data is mandatory as necessary to fulfil the contractual, financial and fiscal obligations. Therefore, any opposition to that data provision would make it impossible for SATA to deliver the services for which the Customer has subscribed the contract.

### *Data retention*

The Customer data are retained the strictly necessary time to meet the objectives for which they are collected and processed. In particular, the processed documents are retained a maximum of three (3) months while a selection of metadata, not including personal data, is retained for fifteen (12) months.

### *Data disclosure and dissemination*

The Customer data can be forwarded to third parties that process them on behalf of SATA and are therefore appointed as Processors through legally binding agreements assuring data protection. Moreover, the Customer data are



communicated to the accountant, to fulfil the tax liabilities, as well as to those authorities and surveillance and control bodies having the right of requesting them.

The Customer data are not subject to dissemination. Should it happen, in the frame of the service purposes, to transfer data towards a country outside the European Union or to an international organisation, the Customer will be informed of the existence of an adequacy decision by the Commission concerning that third party or of equivalent safeguards for personal data protection.

#### *Rights of data subjects*

Each data subject concerned by the Customer personal data can invoke at any time his/her own rights with respect to the Controller:

- Obtain confirmation of existence or absence of own personal data.
- Obtain indications about the processing purpose, the categories of personal data, the recipients or the recipient classes to whom the personal data can be disclosed and, whenever possible, their retention period.
- Obtain the rectification or erasure of personal data.
- Obtain the restriction of processing or object to processing personal data.
- Obtain the data portability or receive the concerned personal data in a structured, commonly used and machine-readable format and thus being enabled to transmit those data to another Controller.
- Revoke at any time the consensus to data processing without prejudice to lawfulness of processing performed before the revocation.
- Lodge a complaint to the Supervisory Authority for the protection of personal data.

For SATA  
*The Legal Representative*