

Privacy Policy – with regard to Regulation (EU) 2016/679

GDPR General Data Protection Regulation

Privacy statement in accordance with in art. 13 of D.Lgs 196/2003, (following, the “Privacy Code”) and the new European legislation of private data protection. GDPR- General Data Protection Regulation, Reg. EU 2016/679.

In relation to your personal data processed by ATP s.r.l. within the meaning and for the purposes as specified by the new European legislation of personal data protection GDPR- General Data Protection Regulation, Reg. EU 2016/679, we inform as follow:

1. Type of processed data

The Personal data which will be processed are:

- 1.1. Personal data (name and surname, date of birth, address, phone numbers and email);
- 1.2. Information about education, occupation;
- 1.3. Trading and economic Company data;

2.1. Main purposes of processing of personal data

The processing personal data referred to in point 1.1, is strictly finalized to:

- Allow to use the website service (newsletter, information, training, etc.);
- Allow to receive assistance and notices concerning in how to use the services (by way of example, though not exhaustive, information about changes of the general conditions of the contract and/or the terms of login to the services, update of the privacy policy, etc.)
- Allow the compliance concerning accounting and tax of ATP s.r.l. and, more generally, for administrative and management requirements, to fulfill legal obligations;

- 2.2. Secondary purpose of data processing

The processing personal data referred to in point 1, it is finalized exclusively:

2.2.1. to carry out opinion polls, sending e-mail, ordinary correspondence, fax, other media, of invitations to take part in courses, events and/or similar activities, as well as promotional information about services and products of ATP s.r.l.

The processing personal data referred to in point 1.2., 1.3., it is finalized exclusively:

2.2.2. at the optimization of the use of website services (information, training, etc.).

2. Methods of the data processing

(a) The processing is carried out by means of operations or series of operations listed in the Art. 4 Privacy Code and to art 4 n.2 GDPR and precisely: collection, recording, organizing, storing, retrieving, processing, modification, selection, retrieval, comparison, use, interconnection, block, communication, cancellation and destruction of data;

(b) The processing can be carried out with or without the aid of electronic or automated tools;

(c) The processing is done by the owner and/or by the person in charge for the process .

(d) It should be noted that the given consent can be revoked in any moment by tap the link that is present in each email that as been sent or through the email address: info@groupatp.com, without undermining the lawfulness of the data process done up the time of the withdrawal .

(e) Personal data collected for the purpose of this policy will be retained until the revocation of the consent, referred to in point (d), unless the same information are not the subject of other process by the same owner.

3. Conferment of data

3.1. The conferment of personal data referred to in point 1.1. is necessary for the purposes of conducting the activities referred to in point 2.1; 2.2.1, 2.2.2.;

4. Refusal of data submission

any refusal by the interested party to provide personal data in the case indicated to in 3.1. implies the impossibility of fulfilling the activities referred to in point 2 and therefore to be able to use website services for registered users;

5. Disclosure of personal data to third parties

5.1. personal data may come to know to the processing controller and, limited to the data referred to in points 1.1. and 1.2., can be communicated for the purposes referred to in point 2. To Partner Company, credit Istitutions, professionals and external collaborators in charge of collaborating with the administrative departments of ATP s.r.l., as well as to all those subjects to whom the communication is necessary for the correct fulfillment of the purposes indicated to in point 2;

5.2 without his express consent (ex art.24 lett. a) Privacy Policy and art. 6 lett. b) and c) GDPR), the Data owner may communicate his data for the purposes referred to in art 2. A.) to Supervisory boards, Judicial and to all other subjects to whom the communication is mandatory by law for the accomplishment of this purpose.5.2.The personal data to in point 1.1., they can also be communicated on the website "www.groupatp.com", within the specific forms.

6. Dissemination of Data

There is not disclosure of personal data;

7. Rights of the Data subject

As interested party, has the rights referred to in Art. 15 GDPR and particularly the rights of:

1. obtain confirmation of the existence or not of personal data concerning them, even if not yet registered, and their communication in an intelligible form;
2. Obtain information: a) the origin of the personal Data; b) the purposes and procedures of the Data processing; c) the logic applied when the Data is processed with the use of electronic equipment; d) identification details of the owner, of the Data controller and the ,representative person if designed under Art. 3.1, GDPR; e) parties or the category of parties to whom the personal data may be communicated or who can learn about it as designed Data Controller in the State ,managers or persons in charge;
3. obtain: a) the update and the rectification ,when there is interest, of Data integration; b)the cancellation, the transformation into an anonymous form or the blocking of processed data in violation of the law, including those which not need to be kept in relation to the purposes for which the data were collected or subsequently processed; c) the attestation that the operations, referred to in the letters a) and b) they have been brought to the attention, also regarding their content, of those to whom the data were communicated

or disclosed, except in the case in which such fulfillment is proving impossible or requires a use of means manifestly disproportionate compared to the protected right;

4. oppose, in whole or in part: a) for legitimate reasons the processing of personal data concerning him/her, even if pertinent to the scope of the collection; b) the treatment of personal data relating to advertising material or direct sales or for market research or commercial communication, by the use of automated calling system without the intervention of an operator by e-mail. Please note that the right of opposition of the interested party, exposed to the previous point b), for direct marketing purposes through automated methods, is extended also at the traditional ones and in any case the possibility remains for the interested party to exercise the right to oppose even partially. Therefore, the interested party, It may decide to only receive communications through traditional methods or only automated communications or neither of the two types of communication.

It also owns the rights referred to in Art. 16-21 GDPR (Right of reply, Right to be forgotten, state-imposed, Right to personal data portability, Right to oppose), the Right of complaint to the Guarantor Authority.

8. Specific Permission

It expressly authorizes ATP s.r.l. to:

8.1 process and use the data for the purposes set out in the points 2.1; 2.2.1, 2.2.2.;

8.2 receive from ATP s.r.l., Companies of the group and business partners, invitations to events, events, proposals and commercial information also by e-mail, fax, ordinary correspondence , newsletter, sms, or other communication tools;

8.3 allow the communication of the personal data referred to in the points 1.1, 1.2, 1.3, within the scope of the above points 6 and 7;

9. Holder of the processing of personal data

The holder of the processing of personal data is ATP S.r.l., with registered office in Rome (Italy) via H. Spencer nr., 36 – cap. 00177, Rome, VAT nr. IT07455561006. In case you want to exercise the rights referred to in the previous point 8., you can make a specific written request through a simple email to: info@groupatp.com . The Data Controller is not subject to the assignment of the Data Protection Officer (DPO).