

INFORMATION ON PERSONAL DATA HANDLING AND MANAGEMENT

Pursuant to Regulation (EU) 2016/679 (General Data Protection Regulation - hereinafter “GDPR”) and to Legislative Decree 196/2003 (as last amended by Legislative Decree 101/2018 - hereinafter “Privacy Code”) the following information is provided regarding the handling and management of personal data of the Users and/or Visitors who access and browse the website referred to at the URL <http://www.interna.it> (hereinafter the “Site”).

DATA MANAGER

The Data Manager is **Interna Holding Spa**, with registered office in Tavagnacco (UD), Via G. Galilei n. 9/A, Italy (hereinafter “Owner”). To exercise the rights recognized by the Regulation (EU) 2016/679 (hereinafter “GDPR” or “Regulation”) or to request any clarification relating to the handling and management of personal data, you can contact the Data Manager at the following addresses:
email: privacy@interna.it | PEC: internaholding@pec.it | phone: +39 0432 643 211.

DATA SAFETY

The Data Manager has adopted technical and organizational procedures to guarantee a level of security appropriate to the risk and in compliance with the legislation on the handling and management of personal data.

INFORMATION ON THE TYPES OF DATA MANAGED

A) BROWSING DATA

While browsing the Site, a series of personal data are processed, such as IP addresses or domain names of the computers employed by users, web page of origin and exit, URI/URL addresses of the requested resources, date and time of the visit, information related to the operating system and browser of the interested party, as well as further technical data relating to the browsing.

Purpose and legal basis of the processing (GDPR Art. 13, paragraph 1, letter c)

The processing of such data - in an automated and aggregate form - is carried out exclusively for purposes relating to the management and administration of the Site, as well as for statistical purposes. The data could also be used to ascertain responsibility in the event of computer crimes against the Site and/or other crimes.

The legal basis is the legitimate interest of the Data Manager (art. 6, par.1, letter f, GDPR).

Scope of communication (GDPR Art. 13, paragraph 1, letter e, f)

The data are processed exclusively by duly authorized personnel and trained in processing, as well as by the IT service providers involved in the management of the Site, identified as data managers. The data will not be disclosed and/or transferred outside the European Economic Area.

Data retention period (GDPR Art. 13, paragraph 2, letter a)

Unless necessary due to ongoing investigations following illicit acts or malfunctions, the data generally do not persist for more than 7 days.

Data acquisition (GDPR Art. 13, paragraph 2, letter e)

The data are not provided by the interested party but acquired automatically by the technological systems of the Site.

B) CONTACT REQUESTS

Sending messages to the addresses listed on the Site involves the acquisition and processing by the Owner of the site of the contact data of the sender that will be necessary to answer, as well as all the personal data included in the text.

Purpose and legal basis of the processing (GDPR Art. 13, paragraph 1, letter c)

The contact data are requested and processed to provide a response and/or to contact the interested party. The legal basis of the processing is the execution of pre-contractual procedures adopted at the request of the interested party (art. 6, par.1, letter b, GDPR).

Scope of communication (GDPR Art. 13, paragraph 1, letter e, f)

The data are processed exclusively by duly authorized personnel and trained in the processing.

The data are not disclosed and/or transferred outside the European Economic Area.

Data retention period (GDPR Art. 13, paragraph 2, letter a)

As a rule, the data are stored for the time required to answer to the interested party. More generally, the data will be stored for a period identified according to criteria of strict necessity due to the different purposes pursued and, in any case, in compliance with the current legislation on the protection of personal data and according to the logic of protection of the rights of the Data Manager (terms of prescription as per the Italian Civil Code).

Data acquisition (GDPR Art. 13, paragraph 2, letter e)

Failure to provide the data will make it impossible to receive an answer to a request.

C) SUBSCRIPTION TO THE NEWSLETTER

The voluntary and optional subscription to the newsletter involves the processing of the contact data of the interested party for sending periodic electronic communications relating to the activity, services and offers of the Data Manager.

Purpose and legal basis of the processing (GDPR Art. 13, paragraph 1, letter c)

The purpose is to complete the subscription to the newsletter to receive periodic electronic communications regarding the activities, services and offers of the owner.

The legal basis of the processing is the consent of the interested party (art. 6, par.1, letter a, GDPR).

Scope of communication (GDPR Art. 13, paragraph 1, letter e, f)

The data are processed exclusively by duly authorized personnel and trained in the processing and by external suppliers identified as Data Processors.

The Data Manager guarantees that, in providing the service, the data will not be transferred outside the European Economic Area (not even regarding operations carried out by any sub-managers).

Data retention period (GDPR Art. 13, paragraph 2, letter a)

The data will be retained until the interested party requests cancellation.

Data Acquisition (GDPR Art. 13, paragraph 2, letter e)

Failure to provide the mandatory data will make it impossible for the interested party to subscribe to the newsletter.

D) WORK WITH US - OPEN POSITIONS (CAREERS)

The interested party can respond to the job advertisements on the site or send a generic application.

Purpose and legal basis of the processing (GDPR Art. 13, paragraph 1, letter c)

The data are processed to:

- manage the evaluation procedure of the interested party in relation to the selection in which he/she intends to participate;
- keep the CV of the interested party to evaluate it for future positions of potential interest.

Legal basis: art. 6, par.1, letter. b of the GDPR; art. 9, par.2, letter. b of the GDPR.

With regards to specific categories of personal data, the Data Manager guarantees that:

1. the processing will be carried out only if necessary to fulfil or require the fulfilment of specific obligations or to carry out specific tasks required by European Union legislation, laws, regulations, or collective agreements, including corporate ones, pursuant to internal law, in particular for the purposes of establishing an employment relationship;
2. if the CVs sent by candidates contain data that are not relevant to the purpose pursued, the Data Manager will refrain from using such information.

Scope of communication (GDPR Art. 13, paragraph 1, letter e, f)

Only personnel authorized to process data and subjects who, processing data on behalf of the Data Manager, have been identified as Data Processors, will be able to access the personal data. These subjects are bound to secrecy and confidentiality also based on specific internal regulations. Except as indicated in relation to cookies, the data will not be transferred to third countries.

Data retention period (GDPR Art. 13, paragraph 2, letter a)

The data will be stored for 12 months.

Data Acquisition (GDPR Art. 13, paragraph 2, letter e)

Failure to provide the mandatory data will make it impossible to participate in the personnel selection procedure.

E) WORK WITH US - SPONTANEOUS APPLICATION (CAREERS)

The interested party can answer to the job advertisements on the site or send a generic application.

Purpose and legal basis of the processing (GDPR Art. 13, paragraph 1, letter c)

The data are processed to:

- allow the interested party to submit their CV to the Data Manager, even if selections for the desired roles are not currently available;
- keep the CV of the interested party in the appropriate database to evaluate it for potential future positions.
- Legal basis: art. 111-bis of Legislative Decree 196/03 and art. 6, par.1, letter. b of the GDPR (execution of a contract of which the interested party is a part of, or execution of pre-contractual procedures adopted at the request of the same).

Scope of communication (GDPR Art. 13, paragraph 1, letter e, f)

Only personnel authorized to process data and subjects who, processing data on behalf of the Data Manager, have been identified as Data Processors, will be able to access the personal data. These subjects are bound to secrecy and confidentiality also based on specific internal regulations. Except as indicated in relation to cookies, the data will not be transferred to third countries.

Data retention period (GDPR Art. 13, paragraph 2, letter a)

The data will be stored for 12 months.

Data Acquisition (GDPR Art. 13, paragraph 2, letter e)

Failure to provide the data will make it impossible for the Data Manager to examine the application.

RIGHTS OF THE INTERESTED PARTY

Pursuant to the articles 15 and following of the GDPR, with reference to their personal data, the interested party has the right to:

- demand from the Data Manager access to and obtain a copy of, as well as knowing their purpose, retention period and any recipients;
- obtain the rectification of inaccurate personal data and the integration of incomplete data, without unjustified delay;
- obtain the limitation of processing, in the cases provided for by the art. 18 GDPR, merely for conservation or operations for which explicit consent has been given, as well as in cases where it is necessary to safeguard rights in court, to protect public interests or the rights of third parties;
- obtain their cancellation, without unjustified delay, if:
 - the data are no longer necessary for the purposes indicated;
 - the consent to processing has been revoked;
 - the data have been processed unlawfully;
 - the cancellation is necessary to fulfil a legal obligation and in the other cases provided for by art. 17 of the GDPR;
- oppose the processing of their personal data, pursuant to art. 21 GDPR, in particular for direct marketing purposes, with the consequent impossibility of further processing of the data for this purpose;
- receive, from the Data Manager, the data without delays, in a structured, commonly used form, readable by an automatic device, to transmit them to another data manager (so-called right to portability);
- revoke at any time the consent to the processing of the data already supplied, without this jeopardizing the lawfulness of the processing carried out up to that point;

The exercise of the abovementioned rights can be carried out by contacting the Data Manager at the addresses stated above.

RIGHT TO COMPLAIN

The interested party who believes that the processing of their personal data is in violation of the provisions of the GDPR has the right to lodge a complaint with the competent controlling authority.