

Dear User

The company TeamSystem S.p.A. (herein after "TeamSystem", "we", "our" or the "Company"), with main office in Via Sandro Pertini, 88, 61122 Pesaro (PU), Italy, available for contact at [privacy@teamsystem.com](mailto:privacy@teamsystem.com), in its capacity as Data Controller hereby provides you with the information you require to manage your personal data via our website [www.teamsystem.com](http://www.teamsystem.com) (herein after the "Website") pursuant to Regulation (EU) No. 2016/679 (herein after "**Regulation**" or "**GDPR**").

We provide this information not only to fulfill the legal obligations regarding personal data protection envisaged by the GDPR, but also because we consider personal data protection a fundamental value of our business activity. For this reason, we shall provide you with any information that may help you protect your privacy and have control over the way your data is used when you navigate our website.

### **Data Protection Officer (DPO)**

The Data Protection Officer of TeamSystem, namely the person in charge of supervising compliance with the Regulation, is available to answer any questions you may have about how we process your data, and can be contacted at the main office of TeamSystem or at the e-mail address [dpo@teamsystem.com](mailto:dpo@teamsystem.com)..

### **Information regarding the processing of personal data**

When you visit this website or consult or use the services it offers, we can process the personal data (namely any data regarding identified or identifiable persons) listed here below.

For each kind of personal data, you will find in the table here the information regarding the purposes for their processing (a more detailed description of this is given at the foot of the table here below), the mandatory or optional nature of your supply of the data, how the data are processed, the legal basis for their processing, and the subjects to whom the data may be communicated and the relating storage period.



**Identification, contact and access data**, such as first name, last name, username, e-mail address, phone number, TeamSystem ID



| Processing purpose   | Mandatory or optional supply of data   | Legal basis for data processing  |
|--|--|--|
| <ul style="list-style-type: none"> <li>- <a href="#">Contract b), c), d), e)</a></li> <li>- <a href="#">Legitimate Business Interests f), g), h)</a></li> <li>- <a href="#">Marketing i), j), k)</a></li> <li>- <a href="#">Legitimate Marketing Interests l)</a></li> </ul> | <p><b>Mandatory</b> with reference to the <b>Contract Purposes</b> given their essential role in:</p> <p>Allowing you to register and manage your account and to use its functions;</p> <p>Allowing you to use the service you have requested;</p> <p>Conforming to the provisions of the applicable regulations.</p> <p>Should you decide not to supply the data required for Contract Purposes, the Company shall not be able to supply you with the services you have requested.</p> <p><b>Optional</b> with reference to the <b>Marketing Purposes</b>. This means that if you object to receiving marketing messages or you refuse to give your consent, or you revoke it, you will not receive marketing messages. In any case, you may revoke at any time your consent to having your personal data processed via the procedures indicated in this Information notice.</p> <p><b>Optional</b> with reference to the <b>Legitimate Business Interests Purposes</b> and the <b>Legitimate Marketing Interests Purposes</b> and you may object to this processing in the manner described in this Information notice, but should you decide to object to processing, your personal data will not be used for Legitimate Business Interests Purposes and you will no longer receive notifications, unless the Company can demonstrate it has compelling</p> | <p>- As regards <b>Contract Purposes</b>, your data are processed in order to supply you with the service requested.</p> <p>- As regards of <b>Legitimate Business Interests</b>, your data are processed as per Art. 6, letter f) of the GDPR for the purposes of the Company’s legitimate interests that is equally balanced with your interests, rights and freedom considering that the processing of your data is limited to what is strictly necessary for the execution of the operations indicated under letters e), f) and g).</p> <p>- As regards <b>Marketing Purposes</b>, your personal data are processed with reference to the activities indicated under letter i), based on Art. 130 of the ‘Codice Privacy’, by which we may send you via e-mail marketing messages relating to services and products similar to those supplied to you, under the condition that you have given your consent to receive said messages;</p> <p>with reference to the activities indicated under letters j), k), based on your giving your consent.</p> <p>- As regards <b>purposes of Legitimate Marketing Interests</b>, your data are processed as per Art. 6, letter f) of the GDPR for the purposes of the Company’s legitimate interests that is equally balanced with your interests, rights and freedom.</p> |

legitimate grounds for the processing or if it must exercise or defend legal claims pursuant to Art. 21 of the GDPR.



**Information regarding billing and payment data, such as VAT number if any, tax registration code, address, and company name**



| Processing purpose  | Mandatory or optional supply of data  | Legal basis for data processing   |
|---|---|---|
| <ul style="list-style-type: none"> <li>- <a href="#">Contract b), c), e)</a></li> <li>- <a href="#">Legitimate Business Interests f), g), h)</a></li> </ul> | <p><b>Mandatory</b> with reference to the <b>Contract Purposes</b> given their essential role in:</p> <ul style="list-style-type: none"> <li>Allowing you to register and manage your account and to use its functions;</li> <li>Allowing you to use the service you have requested;</li> <li>Conforming to the provisions of the applicable regulations.</li> </ul> <p>Should you decide not to supply the data required for Contract Purposes, the Company shall not be able to supply you with the services you have requested.</p> <p><b>Optional</b> with reference to the <b>Legitimate Business Interests Purposes</b> and you may object to this processing in the manner described in this Information notice, but should you decide to object to processing, your personal data will not be used for Legitimate Business Interests Purposes and you will no longer receive notifications, unless the Company can demonstrate it has compelling legitimate grounds for the processing or if it must exercise or defend legal claims pursuant to Art. 21 of the GDPR.</p> | <ul style="list-style-type: none"> <li>- As regards <b>Contract Purposes</b>, your data are processed in order to supply you with the service requested.</li> <li>As regards <b>purposes of Legitimate Business Interests</b>, your data are processed as per Art. 6, letter f) of the GDPR for the purposes of the Company's legitimate interests that is equally balanced with your interests, rights and freedom considering that the processing of your data is limited to what is strictly necessary for the execution of the operations indicated under letters f), g) and h).</li> </ul> |



**Navigation data, such as IP addresses, domain name and other parameters relating to the computer and to the operating system you are using**



| Processing purpose  | Mandatory or optional supply of data  | Legal basis for data processing  |
|---|---|--|
| <p>- <a href="#">Contract a), b), c), e)</a></p> <p>- <a href="#">Legitimate Business Interests f), g), h)</a></p> <p>- <a href="#">Marketing i), j), k)</a></p> <p>- <a href="#">Legitimate Marketing Interests l)</a></p> | <p><b>Mandatory</b> with reference to the <b>Contract Purposes</b> given their essential role in:</p> <ul style="list-style-type: none"><li>- To allow you to navigate the website;</li><li>- Registration and management of the account and use of functions connected to the account;</li><li>- Allowing you to use the service you have requested;</li><li>- Conforming to the provisions of the applicable regulations.</li></ul> <p>Should you decide not to supply the data required for Contract Purposes, the Company shall not be able to supply you with the services you have requested.</p> <p><b>Optional</b> with reference to the <b>Marketing Purposes</b>. This means that if you object to receiving marketing messages or you refuse to give your consent, or you revoke it, you will not receive marketing messages. In any case, you may revoke at any time your consent to having your personal data processed via the procedures indicated in this Information notice.</p> <p><b>Optional</b> with reference to the <b>Legitimate Business Interests Purposes</b> and the <b>Legitimate Marketing Interests Purposes</b> and you may object to this processing in the manner described in this Information notice, but should you decide to object to processing, your personal data will not be used for Legitimate Business Interests Purposes and you will no longer receive notifications, unless the Company can demonstrate it has compelling legitimate grounds for the processing or if it must exercise or defend legal claims pursuant to Art. 21 of the GDPR.</p> | <p>- As regards <b>Contract Purposes</b>, your data are processed in order to supply you with the service requested.</p> <p>- As regards <b>Legitimate Business Interests</b>, your data are processed as per Art. 6, letter f) of the GDPR for the purposes of the Company's legitimate interests that is equally balanced with your interests, rights and freedom considering that the processing of your data is limited to what is strictly necessary for the execution of the operations indicated under letters f), g) and h).</p> <p>- As regards <b>Marketing Purposes</b> your personal data are processed with reference to the activities indicated under letter i), based on Art. 130 of the 'Codice Privacy', by which we may send you via e-mail marketing messages relating to services and products similar to those supplied to you, under the condition that you have given your consent to receive said messages;</p> <p>with reference to the activities indicated under letters j), k), based on your giving your consent.</p> <p>- As regards <b>purposes of Legitimate Marketing Interests</b>, your data are processed as per Art. 6, letter f) of the GDPR for the purposes of the Company's legitimate interests that is equally balanced with your interests, rights and freedom.</p> |



**Product data**, such as the data relating to the products the licence of which and/or the services you have purchased



| Processing purpose   | Mandatory or optional supply of data  | Legal basis for data processing  |
|--|---|--|
| <ul style="list-style-type: none"> <li>- <a href="#">Contract c), d), e)</a></li> <li>- <a href="#">Legitimate Business Interests f), g), h)</a></li> <li>- <a href="#">Marketing i), j), k)</a></li> <li>- <a href="#">Legitimate Marketing Interests l)</a></li> </ul> | <p><b>Mandatory</b> with reference to the <b>Contract Purposes</b> given their essential role in:</p> <p>Allowing you to use the service you have requested;<br/>           Conforming to the provisions of the applicable regulations.</p> <p>Should you decide not to supply the data required for Contract Purposes, the Company shall not be able to supply you with the services you have requested.</p> <p><b>Optional</b> with reference to the <b>Marketing Purposes</b>. This means that if you object to receiving marketing messages or you refuse to give your consent, or you revoke it, you will not receive marketing messages. In any case, you may revoke at any time your consent to having your personal data processed via the procedures indicated in this Information notice.</p> <p><b>Optional</b> with reference to the <b>Legitimate Business Interests Purposes</b> and the <b>Legitimate Marketing Interests Purposes</b> and you may object to this processing in the manner described in this Information notice, but should you decide to object to processing, your personal data will not be used for Legitimate Business Interests Purposes and you will no longer receive notifications, unless the Company can demonstrate it has compelling legitimate grounds for the processing or if it must exercise or defend legal claims pursuant to Art. 21 of the GDPR.</p> | <p>- As regards <b>Contract Purposes</b>, your data are processed in order to supply you with the service requested.</p> <p>- As regards <b>purposes of Legitimate Business Interests</b>, your data are processed as per Art. 6, letter f) of the GDPR for the purposes of the Company's legitimate interests that is equally balanced with your interests, rights and freedom considering that the processing of your data is limited to what is strictly necessary for the execution of the operations indicated under letters f), g) and h).</p> <p>- As regards <b>Marketing Purposes</b> your personal data are processed with reference to the activities indicated under letter i), based on Art. 130 of the 'Codice Privacy', by which we may send you via e-mail marketing messages relating to services and products similar to those supplied to you, under the condition that you have given your consent to receive said messages;<br/>           with reference to the activities indicated under letters j), k), based on your giving your consent.</p> <p>- As regards <b>purposes of Legitimate Marketing Interests</b>, your data are processed as per Art. 6, letter f) of the GDPR for the purposes of the Company's legitimate interests that is equally balanced with your interests, rights and freedom.</p> |

## Processing purposes

The processing of the categories of personal data indicated in the table shown above is carried out by the Company, in its economic and commercial functions, for specific purposes, as described in more detail here below.

1. **Contract purposes**

- a) to allow you to navigate the website;
- b) registration and management of the account (including account verification and its recovery, where envisaged) and use of functions connected to the account;
- c) execution of the activities necessary for the conclusion and execution of the contract for the supply of the service / product requested or purchased through the Site (for example registration to webinars and events, sending newsletters, formulating estimates, order processing, supplying assistance and support);
- d) management of the requests formulated by you, including any complaints and disputes and sending of service communications and updates, both through traditional communication tools such as paper mail and via remote communication tools, such as email, chat, telephone, SMS , instant message, chatbot, intelligent automated interactive communication systems, banners, notification systems and other distance communication tools;
- e) fulfilment of legal obligations deriving from the laws in force, regulations or community orders (e.g.: fiscal and accounting obligations).

2. **Legitimate Business Interests**

- f) execution and protection of the Company's rights, also with regard to procedures for credit recovery and for assignment of credits to authorised businesses, also via third parties;
- g) analysis and improvement of services and/or products offered;
- h) complete a potential merger, transfer of goods, transfer of a company or business unit, releasing and transferring the data to the other third party or parties.

3. **3. Marketing purposes**

- i) supply you, pursuant to Art. 130, comma 4 of Leg. Decree No. 196/2003 and subsequent amendments (the so-called "Codice Privacy"), marketing messages via e-mail regarding services and/or products similar to those you have used, without prejudice to the fact that, at any time, you may object to our sending you these messages;
- j) with your consent, to provide you with marketing communications, to engage you in market research or other customer satisfaction initiatives either through traditional communication tools such as paper mail or via remote communication tools, such as email, chat, telephone, SMS , instant message, chatbot, intelligent automated interactive communication systems, banners, notification systems and other distance communication tools;
- k) subject to your giving consent, to send you marketing messages with the methods described in letters j) and k) above relating to products and services of other businesses of the group to which the Company belongs and/or of partners belonging to its sales network, to whom your data may be communicated and the list of which is available by contacting the Company via the channels indicated in this Information notice.

#### 4. **Legitimate Marketing Interests**

I) should it be possible to send you messages for Marketing Purposes pursuant to this Information notice, to involve you in scarcely invasive forms of segmentation based, among other things, on professional classification, city/province/region in which you work and the type of service and/or product for which you have requested further information.

You will find further information regarding the purposes for processing your personal data (e.g.: related to the purchase/subscription to products or services of TeamSystem or of other companies of the group that supply the services offered through the portal, customer care services, etc.) in the information notices made available in the other sections of the website and that are suitably highlighted.

### **Communication, release and transfer of data**

As regards **Contract Purposes**, your data may be transferred to the following third party subjects that perform activities that are functional to the services you have requested us to supply and located inside and outside the European Union: (a) third party suppliers of assistance and consulting services for the Company with reference to the activities of the following sectors (for example): technology, accounting, administration, law, insurance; (b) companies of the group the Company is a member of; (c) subjects and authorities whose right of access to the data is acknowledged by the law and by the regulations or provisions issued by the competent authorities.

As regards of **Legitimate Business Interests**, the data may be transferred to the following categories of recipients, located inside and outside the European Union: (a) third party suppliers of assistance and consulting services for the Company with reference to the activities of the following sectors (for example): technology, accounting, administration, law, insurance, (b) companies of the group the Company is a member of, (c) potential purchasers of the Company and entities resulting from a merger or from any other form of transformation involving the Company, (d) competent authorities.

As regards **Marketing Purposes** and **Legitimate Marketing Interests**, the data may be transferred to the following categories of recipients, located inside and outside the European Union: (a) third party suppliers of assistance and consulting services for the Company with reference to the activities of sending marketing messages; (b) companies of the group the Company is a member of.

Depending on the circumstances, these recipients will process your data as data controllers, as data processors or as persons assigned to process the data. The complete and updated list of the subjects processing data as data processors is available on request to the data protection Officer, by means of the contact procedures indicated in this Information notice.

### **Data processing methods**

Your personal data are processed by the Company using electronic and manual systems in compliance with the principles of lawfulness, fairness and transparency envisaged by the applicable regulations relating to the protection of personal data and protecting your privacy by providing technical and organizational safeguards so as to ensure adequate security levels.

Such processing will take place at the Company's main office and/or at the premises of the external data processors who process the data on behalf of TeamSystem within and sometimes outside the European Union and, especially, in the United States of America. With reference to transfers outside the European Union towards countries considered by the European Commission as not capable of providing adequate safeguards, the Company shall provide the safety measures that are suitable and adequate for protecting your data. Consequently, any transfer of data to countries located outside the European Union will occur, in any case, in compliance with the appropriate safeguards and suitable for data transfer, such as data protection contract clauses, as per the regulations applicable and in particular articles 45 and 46 of the GDPR.

Should you wish to receive more information regarding the safeguards provided for and to request a copy of such safeguards, please contact the Company at any time through the channels indicated in this Information notice.

## Data storage

The data shall be stored for the period of time required to pursue the purposes for which they were collected, as stated in this Information notice. In any case, the following storage periods will be applied with reference to the processing of the data for the purposes indicated in the following:

(i) as regards **Contract purposes** and purposes of **Legitimate Business Interests** the data are stored for a period equal to the duration of the supply of services you have requested and for 10 years after that, without prejudice to those cases in which further storage is requested due to disputes, requests from competent authorities or in compliance with applicable regulations;

(ii) as regards **Marketing Purposes** as indicated under **letters i) and j)** and purposes of **Legitimate Marketing Interests**, the data are stored for a period equal to the duration of the supply of services requested and for a period of 24 months following the last contract with you, to be intended, among others, as participation in a Company event, use of a product or service supplied by the Company or the opening of a newsletter (all together defined as **Last Contract**");

(iii) as regards **Marketing Purposes** as indicated under **letter k)**, the data are stored for a period of 12 months as from the creation of your account or your use of a service.

## Change of choices and revocation of consent



If you change your mind, you can change the choices you made at any time by contacting us as indicated here under, or, should you no longer wish to receive our commercial messages, by using the 'unsubscribe' link visible at the bottom of our messages. Should you not give your consent or should you revoke it, this will not prejudice in any way your use of the functions available at our website.

## Rights of the data subject

With regard to the data processing described in this Information notice, you may exercise at any time the rights indicated in the GDPR (articles 15-21), including the following rights:

- to receive confirmation of the existence of your personal data and to access their content (right of access);
- to update, change and/or correct your personal data (right of rectification);
- to ask for the erasure or the limitation of processing of your personal data processed in violation of the law, including those for which storage is not necessary for the purposes for which the data were collected or otherwise processed (right to be forgotten and right of limitation);
- to object to the processing (right of objection);
- to withdraw consent, where given, without prejudice to the lawfulness of the processing based on the consent given prior to withdrawal;
- to lodge a complaint with a supervisory authority (in Italy: Garante per la protezione dei dati personali [www.garanteprivacy.it](http://www.garanteprivacy.it)) in the event of violation of the discipline concerning the protection of personal data;
- to receive a copy in electronic format of the personal data concerning you, to transfer them to yourself or to another service provider, in the event that the Company conducts the processing of these data based on your consent or on the basis of the circumstance that the processing is necessary for the supply of the service(s) you requested and the data are processed using automated means (right of data portability).

In order to exercise these rights, you can contact the Data Protection officer by sending your request to [dpo@teamsystem.com](mailto:dpo@teamsystem.com), or by sending a letter to:

TeamSystem S.p.A.

Via Sandro Pertini 88

Pesaro

c.a.: Responsabile della Protezione dei Dati

When contacting the Company, make sure to include your full name, e-mail/mail address and/or phone number to ensure that your request is handled correctly.

## **Amendments and updates**

The foregoing Information notice may be subject to change also as a consequence of amendments of and/or additions to the regulations. Any changes shall be notified in advance and a constantly updated version of this Information notice will be made available from Data Protection officer.