## Privacy Policy of the website www.nhoe.it

The website www.nhoe.it is owned and operated by NHOE S.r.l. and ensures compliance with the legislation on the protection of personal data EU Regulation 2016/679.

Users visitors of the site should carefully read this privacy policy before submitting any kind of personal information and/or filling in any electronic form on the site itself.

The policy is provided only for the above mentioned site and not also for other websites that may be consulted by the user through appropriate links on this site.

## 1. General purposes and legal basis of the processing for which the data are intended

The processing of personal data that you may provide is intended solely for the purpose of performing contractual obligations and fulfilling your specific requests, as well as fulfilling regulatory obligations, in particular accounting and tax obligations provided by our business. See Sec. 4 for further details on specific purposes.

## 2. Method of processing

In connection with the stated purposes, your data are subject to computer and manual processing. Processing operations are implemented in such a way as to ensure the logical, physical security and confidentiality of your personal data.

## 3. Legitimate interests pursued by the data controller or third parties

The legitimate interests pursued by the Data Controller in the processing of data derive from having to respect and honor Your requests and/or contractual obligations that may have been signed between the parties.

## 4. Nature of personal data and specific purposes

The object of processing constitutes your personal data processed in the performance of the service you requested and in particular:

## Data provided voluntarily by the user

Personal data provided by the user through telephone contact or by sending requests via e-mail, to the telephone numbers or e-mail addresses indicated in the "Contact Us" and "Telephone & E-mail Addresses" sections, are collected and processed for the following purposes:

- a) for carriyng out relationship activities or under contractual agreements;
- b) for administrative purposes and for the fulfillment of legal obligations such as accounting, tax, or to give effect to requests of judicial authorities;
- c) in the case of sending resumes, exclusively for selection purposes.

#### Data generated by access to the site

Navigation data, computer systems and software procedures used to operate this site acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols.

These data (such as domain names, IP addresses, operating system used, type of browser device used for connection) are not accompanied by any additional personal information and may be used to:

- I) derive anonymous statistical information about the use of the site:
- II) manage needs to control the way the site is used;
- III) ascertain responsibility in case of hypothetical computer crimes.

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## 5. Compulsory or optional nature of provision

Your personal data are processed without your consent, with mandatory nature, in order to fulfill pre-contractual, contractual and fiscal obligations; fulfill obligations required by law, regulation, EU legislation or an order of the Authority; exercise the rights of the Owner, such as the right to defense in court.

## 6. Scope of communication and dissemination of data

Your data may be communicated to:

- all parties to whom the right of access to such data is recognized by virtue of regulatory provisions;
- to our collaborators and employees, within the scope of their respective duties;
- to all those physical and/or juridical, public and/or private persons when the communication is necessary or functional to the performance of our activity and in the manner and for the purposes illustrated above, for example: banks, insurance companies, auditing bodies, debt collection companies, etc.

## 7. Transfer of personal data to a third country

The data will not be transferred outside the European Union except if the fulfilment of your request makes it necessary. In this case they will be transferred in the form and manner provided for by the regulations in force, guaranteeing in any case an adequate level of protection. In any case, personal data will never be disseminated.

#### 8. Methods and duration of personal data storage

Your personal data will be kept for the time required by current regulations or, where not indicated by regulations, for the time strictly necessary to perform the requested service. After this time the data will be deleted without undue delay.

## 9. Existence of an automated decision-making process:

There is no automated decision-making process.

#### 10. Identification details of the data controller.

The Data Controller, pursuant to Article 28 of the Personal Data Protection Code is NHOE S.r.l. with registered office in Via Sangro, 5 - 00071 Pomezia, email privacy@nhoe.it.

#### 11. Rights of the interested party

#### 11.1 Art. 15 (right of access), 16 (right of rectification) of EU Reg. 2016/679

The data subject shall have the right to obtain from the data controller confirmation of personal data relating to him/her are being processed and, if so, to obtain access to the personal data and information set out in this notice.

## 11.2 Right under Article 17 of EU Reg. 2016/679 - right to erasure ("Right to be forgotten")

The data subject shall have the right to obtain from the controller the erasure of personal data concerning him/her without undue delay, and the controller shall be obliged to erase the personal data without undue delay, if any of the following grounds applies:

- (a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- (b) the data subject withdraws the consent on which the processing is based in accordance with point (a) of Article 6(1) or point (a) of Article 9(2) and if there is no other legal basis for the

#### processing

- (c) the data subject objects to the processing pursuant to Article 21(1) and there is no overriding legitimate ground for the processing, or objects to the processing pursuant to Article 21(2);
- (d) the personal data have been unlawfully processed;
- (e) the personal data must be erased in order to comply with a legal obligation laid down by Union or Member State law to which the controller is subject;
- (f) the personal data have been collected in connection with the provision of information society services as referred to in Article 8(1) of EU Reg. 2016/679

## 11.3 Right referred to in Article 18 Right to restriction of processing

The data subject shall have the right to obtain from the controller the restriction of processing when one of the following cases occurs:

- (a) the data subject contests the accuracy of personal data, for the period necessary for the controller to verify the accuracy of such data
- (b) the processing is unlawful and the data subject is opposed to the erasure of the personal data and requests instead that their use be restricted
- (c) although the controller no longer needs the personal data for processing purposes, the personal data are necessary for the establishment, exercise or defence of legal claims by the data subject (d) the data subject is opposed to the processing pursuant to Article 21(1) EU Reg 2016/679 pending verification that the legitimate reasons of the data controller override those of the data subject.

## 11.4 Right under Article 20 Right to data portability

You have the right to receive in a structured, commonly used and machine-readable format the personal data concerning you that you have provided to a data controller and you have the right to transmit such data to another data controller without hindrance from the data controller If you wish to receive more information about the processing of your personal data, or to exercise the rights referred to in Section 11 above, you may contact us at the following e-mail address: privacy@nhoe.it. Before we can provide you with, or change any information, in the shortest possible technical time, we may need to verify your identity and answer some personal questions about the data provided.

### 12. Withdrawal of consent to processing

You have the right to revoke your consent at any time without affecting the lawfulness of the processing based on the consent given prior to revocation. You are entitled to revoke your consent to the processing of your personal data by sending an e-mail to the following address: privacy@nhoe.it with the following text: "revocation of consent to the processing of all my personal data". Upon completion of this operation, your personal data will be removed from the archives as soon as possible.

#### **COOKIE POLICY**

#### **Definition of cookies**

Cookies are small text strings that the sites you visit send to your terminal (usually to your browser), where they are stored and then transmitted back to the same sites the next time you visit.

#### **Use of Cookies**

When you access the pages of the www.nhoe.it website, "technical" cookies are sent to the device you are using (computer, telephone, tablet, etc.).

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#### **Technical cookies**

These are fundamental cookies for navigating within the site and using all the functions, such as access to reserved areas. Without these cookies it would not be possible to provide the services requested. These cookies do not collect information to be used for commercial purposes.

**Analytics cookies** collect information, in aggregate form, about the number of users and how they visit the site.

## **Deciding how to surf the Internet**

All browsers offer the possibility to prevent the recording of cookies on the hard disk. With this operation, some functions of web pages may not be performed correctly. The modes of the main browsers:

**Internet Explorer** 

Chrome

Firefox

<u>Opera</u>

Safari

With regard to analytics, cookies can be deactivated via the following link:

# **Google Analytics**

## Reference regulation on cookies

"Identification of the simplified modalities for the information and acquisition of consent for the use of cookies", Guarantor for the Protection of Personal Data, 8 May 2014, published in the Official Gazette no. 126 of 3 June 2014

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