



# Data Privacy Notice

According to art. 13 EU Reg. 679/2016 (GDPR)



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## GENERAL INFORMATION

### Documentary Check

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### Formal Control

Prepared by:	Revised by:	Approved by:
<i>Legal &amp; Compliance</i>	<i>Privacy Responsible</i>	<i>Direction/DPO</i>

### Version Control

Version	Modified parts	Changelog	Date
1.0	Original	File Creation	01/12/2020
1.1	Entire document	Updating of the Policy	03/05/2021
1.2	1.1, 1.5, 1.6, 1.7, 1.9, 1.10	Updating of the Policy	26/07/2021
1.3	1.4, 1.5, 1.6, 1.11	Updating of the Policy	06/06/2022
1.4	1.1	Updating company information	27/03/2024

# 1. Personal Data Processing Policy

In accordance with the provisions of the EU Regulation No. 679/2016 of the European Parliament and of the Council of April 27, 2016 (hereinafter also only "GDPR") regarding the protection of Personal Data, Uanataca S.A. unipersonale (hereinafter also only "Uanataca") explains, in this Data Privacy Notice, what Personal Data it acquires from Clients as part of the activity of providing Qualified Trusted Services, how it is processed and for what purposes as well as the additional information required under Articles 13 of the GDPR. For the definitions contained within this Privacy Notice, please refer to the Uanataca Certification Practice Statement as well as the GDPR Regulation.

## 1.1. Data Controller

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Uanataca SA unipersonal is the Controller, pursuant to art. 4, n. 7 of the GDPR, of all the Personal Data provided by the Subscribers relating to the activities of qualified trust service provider referred to in the Certification Practice Statement of Uanataca, available in its latest version at the following link:

<https://web.uanataca.com/it/politiche-di-certificazione>.

Furthermore, for any information concerning the processing of Personal Data by Uanataca SA single-member company it is possible to write to the following contacts:

**Uanataca SA unipersonal**

Via Diocleziano n. 107 (80125) Napoli - Italy

**Email address:** [info@uanataca.com](mailto:info@uanataca.com)

**Telephone number:**

(IT) +39 081 7625600

With reference only to the processing for the issuing CNS certificates, in compliance with the CPS, Uanataca operates, pursuant to art. 26 of the GDPR, as joint controller with the following subject:

**University of Naples Parthenope**

Registered office: Via Amm. F. Acton 38 (80133) Naples - Italy

Tax code / VAT number: 01877320638

## 1.2. Data Processor/s

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For the purposes of carrying out the activities relating to the personal data processing, in accordance with this notice, Uanataca may use, pursuant to art. 28 co. 1 of the GDPR, third parties who present sufficient guarantees to implement appropriate technical and organizational measures in such a manner that processing will meet the requirements of the GDPR Regulation and ensure the protection of the rights of the data subject.

A complete list of Data Processors, if any, appointed by Uanataca can be requested from the latter at any time, by contacting one of the addresses indicated in the previous paragraph.

## 1.3. Data Protection Officer

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Uanataca has designated, pursuant to art. 37 of the GDPR, a Data Protection Officer (DPO or DPO "Data Protection Officer") identifying him among those subjects who, pursuant to art. 37 n. 5 of the aforementioned standard, possess the professional qualities, the requisites of specialist knowledge of the data protection legislation and practices.

The Data Protection Officer of Uanataca, who is the figure in charge of monitoring compliance with the GDPR Regulation, is available to respond to all requests from interested parties on how the data are processed and can be contacted at the Uanataca headquarters or directly at the following addresses:

- DPO electronic address: [dpo@uanataca.com](mailto:dpo@uanataca.com).

For the identification of the roles and tasks of the DPO, please refer to the provisions of art. 39 of the GDPR.

#### **1.4. Data Processing Methods**

Personal Data are processed in paper and electronic format in compliance with the organizational and security measures provided for by the applicable law and the related Processing will be based on compliance with the principles of correctness, lawfulness, transparency, completeness, limitation of purposes and conservation, not excess, minimization and accuracy, integrity and confidentiality, as well as the principle of accountability pursuant to art. 5 of the GDPR in order to guarantee the most adequate security measures and reduce the risks of destruction / loss, unauthorized access or processing that does not comply with the purposes described in this document.

The data collected through the completion of online forms are processed electronically and may be subject to automated processing by means of information systems of a managerial nature.

These processing activity take place at the headquarters of Uanataca and/or at the external managers who carry out the treatment according to the instructions given by Uanataca.

#### **1.5. Personal Data Processed**

Pursuant to art. 4 n. 1 of the GDPR is meant by "*personal data*": "*any information concerning an identified or identifiable natural person ("interested"); is considered identifiable the person who can be identified, directly or indirectly, with particular reference to an identifier such as the name, an identification number, location data, an online identifier or one or more characteristic elements of his physical, physiological, genetic, psychic, economic, cultural or social identity*".

Are meant by "*personal data*", therefore, all those information or fragments of information that allow the identification of a natural person.

In order to execute requests for the issuance of qualified digital certificates (signature, seal), of National Service Card and Qualified Time Stamps by the Subscribers as well as, in the context of the contractual relationship with them, Uanataca will process the following categories of Personal Data:

- **Personal data:** all personal data that allow the certain identification of a natural or legal person, provided at the time of the request for issuance of the certificate including: name, surname, sex, date and place of birth, tax code, address of residence/domicile, home/mobile telephone number, VAT number, details and copy of a valid identity document, or other information such as, for example, the company where the person works or provides service, the position held and sector of activity;
- **IT data:** IP address of origin, log; this category also includes images and videos, acquired during the remote video-recognition session (via webcam), in case of identification through the use of this procedure, of the subjects to be identified;
- **Biometric data:** consisting of those fragments of images and / or videos which, through automatic processing by means of specific hardware / software tools, allow the identity of a natural person to be verified. This type of data is processed only where the data subjects requests to be recognized with recognition methods that use the use of biometrics to ascertain the declared identity and provided that he gives explicit and informed consent.
- **Information for billing and payment data:** any VAT number, tax code, address, IBAN code and bank / postal data of the Subscribers;
- **Usage data:** generated in the context of the product / service purchased;

- **Other data:** including data and documents used by the Subscribers to request the issuance of the digital certificate or processed by Uanataca as part of the Subscribers' identity verification activities or in order to ascertain the presence of the conditions for updating or revocation of the certificate issued to the Holder, as well as information that Uanataca may come into possession of during maintenance and/or technical assistance activities or processed by Uanataca as part of the support and caring purposes carried out for the user.

## **1.6. Purpose of the Processing**

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The processing of the categories of Personal Data listed in the previous chapter is carried out by Uanataca, in the performance of its activities, for specific purposes, as better described below:

- **Contractual and Legal Purposes**
  - a) activities necessary for the conclusion and execution of the contract for the purpose of issuing the required digital certificate and the activities related to its management and use;
  - b) customer assistance activities and support for the use of the service;
  - c) management of any communications necessary for the relationship between Uanataca and the Data Subjects, as well as management of any complaints and / or disputes;
  - d) fulfillment of the obligations to identify the Subscribers referred to in art. 24 co. 1 of Regulation (EU) No 910/2014 of the European Parliament and of the Council of 23 July 2014 on electronic identification and trust services for electronic transactions in the internal market and repealing Directive 1999/93/CA (eIDAS Regulation) and Article 32 paragraph 3 letter a) of Legislative Decree no. 82 of 7 March 2005 and subsequent amendments (CAD). With regard to this purpose, Uanataca has adopted an electronic identification system through audio-video recording, or through authentication with electronic identity card (CIE) or SPID Digital Identity. These systems are used for the purpose of identifying the Subscribers and for the registration of consent, to allow the correct execution of requests for the conclusion of contracts for the supply of goods or for the execution of remote services relating to the Certificates, without the necessary physical presence;
  - e) fulfillment of the additional obligations of qualified trust service providers pursuant to Articles 24 et seq. of the eIDAS Regulation and art. 30 et seq. of Legislative Decree no. 82 of 7 March 2005 and subsequent (CAD);
  - f) fulfillment of other legal obligations (including tax and accounting obligations), regulations, community regulations, or management and response to requests from the competent tax and administrative authorities, including the supervisory authority (Agency for Digital Italy), as well as from the judicial authority.

The provision of data for the purposes referred to in letter d) is mandatory to allow the conclusion of the contract or for the provision of the services requested exclusively in the event that the Data Subjects decides to use an electronic identification system.

Consent to the processing of Personal Data for the additional Contractual and Legal Purposes described above is necessary and mandatory so that, in the event of refusal, Uanataca cannot follow up the contractual relationship and the related provision of the requested service.

- **Marketing Purposes**

- g) to send updates on news and commercial offers of Uanataca products and services, also after interconnection of usage data and analysis of user behavior with respect to the use of Uanataca's services and products or for the invitation to participate in events, conduct market research or other commercial and customer satisfaction initiatives either through traditional communication channels such as paper mail or a telephone call from an operator or through automated communication tools such as e-mail, chat, messages (SMS and other instant messages), chatbots and other remote communication tools;
- h) to communicate Personal Data to other companies of the Uanataca group and / or business partners belonging to its sales network, to send marketing communications and for other commercial initiatives such as those indicated in the previous letter.

The processing of Personal Data for "Marketing Purposes" is not mandatory and remains optional following the provision of the consent of the Data Subjects.

In addition, Uanataca may process the Personal Data acquired to carry out checks on the quality of the service and the security of the system.

The Personal Data acquired by Uanataca will not be processed for purposes other than those described above or in a manner incompatible with them.

Uanataca informs the Data Subjects that their Personal Data may be communicated to public subjects and judicial authorities at the explicit request of the latter, in compliance with the applicable legal provisions and in order to prevent fraud and illegal activities.

### **1.7. Legal Basis of the Processing**

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The legal basis of the Processing, pursuant to Article 6 of the GDPR, is identified:

- with reference to the Contractual Purposes referred to in letters a), b), c) the legal basis that legitimizes the Processing of Personal Data is the fulfillment of the activities necessary for the provision of digital certificates requested by customers (contractual execution);
- with reference to the Purpose of the Law, referred to in letters d), e), f) the legal basis that legitimizes the processing of Personal Data is the fulfillment of the regulatory obligations imposed on Uanataca (fulfillment of a legal obligation) while with reference to the Purposes of the Law referred to in letter d) in the context of the processing of biometric data (in case of choice of identification methods that provides for this type of processing by the Applicant) the legal basis that legitimizes the processing is the prior consent of the Data Subject;
- with reference to the Marketing Purposes, referred to in letters g) and h), the legal basis that legitimizes the processing of Personal Data is the prior consent of the Data Subject, which Uanataca will collect when requesting the issuance of the digital certificate. The express consent is always revocable without any consequence with respect to the contractual relations with Uanataca and the provision of the requested service.

The expression of consent by the Data Subject must always be freely expressed: the Subscribers / Holders are always adequately made aware of the Privacy Policy and all the rights connected to it, including the right to revoke the consent already given or to oppose the Processing at any time.

This consent can be withdrawn at any time by contacting the management of Uanataca S.A. or the DPO at one of the contacts indicated above.

### **1.8. Storage and cancellation of Personal Data**

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The User's Personal Data will be processed for the time necessary to fulfill the aforementioned purposes and, in particular:

- For the Contractual and Legal purposes the Personal Data provided by the Subscribers, relating to the Certificates, will be kept for 20 (twenty) years from the termination of the contract or from the expiration or revocation of the Certificate, in accordance with the provisions of the art. 28, co.4 bis of Legislative Decree 82/2005 and subsequent amendments of the Digital Administration Code.
- For Marketing purposes, the data is kept for a period of 24 months from the date on which the consent is given or renewed when a new product or service with the TeamSystem brand is purchased or the date of the last contact from including participation in a Uanataka event, the use of a product or service provided by Uanataka, the opening of a newsletter;

The service logs relating to the Certificates will be kept for a period equal to 6 (six) months in order to guarantee the correct identification of the flows of services.

After these periods, Uanataka will delete the Personal Data thus acquired.

### **1.9. Recipients or categories of recipients of Personal Data**

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In compliance with the principle of purpose and minimization, the Personal Data acquired by Uanataka may be communicated to the following categories of third parties who carry out activities functional to those specific to the Trust Service Provider, such as (a) personnel in charge of processing (e.g. the staff of the CRM, IT, Retail Offices); (b) third party providers of assistance and consultancy services for Uanataka with reference to the activities of the technological, accounting, administrative, legal, insurance sectors (but not limited to); (c) companies belonging to Uanataka group; (d) banks and credit institutions; (e) debt collection companies; (f) public subjects and authorities whose right of access to your personal data is expressly recognized by law, regulations or provisions issued by the competent authorities; (g) potential purchasers of the company and entities resulting from the merger or any other form of transformation concerning the company; (h) public databases and credit information systems.

For Marketing Purposes, and only with prior express consent, Personal Data may also be disclosed to third parties and business partners in charge of marketing campaigns carried out on behalf of Uanataka or other companies of the Uanataka group.

These recipients, depending on the case, will process the Personal Data as autonomous controller, processors or authorized of the processing. The complete and updated list of subjects who process data as Data Processors is available on request to the Data Protection Officer, according to the contact methods indicated in this Notice.

### **1.10. Personal Data Transfer: EU Area/Extra UE Area**

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The Personal Data acquired by Uanataka may be freely transferred within the European Union. Uanataka does not transfer or provide for the transfer of personal data to subjects located outside the European Union.

However, where, for the purposes indicated, Uanataka needs to transfer such data outside the European Union, to countries not considered adequate by the European Commission (eg United States), the latter will take the necessary measures to protect the Personal Data transferred, in compliance with the guarantees of the law, pursuant to the applicable legislation and in particular articles 45 and 46 of the GDPR.

The interested parties have the right to obtain a copy of the Data held abroad, outside the European Economic Area, and to obtain information about the place where such Data are stored by making an express request to Uanataka at the contacts indicated in this statement.



### 1.11. Rights of the Data Subjects

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In relation to the processing of the data referred to in this Policy, the Data Subject may exercise at any time the rights provided for by the GDPR Regulation (articles 15 et seq.) including:

1. **RIGHT TO ACCESS PERSONAL DATA:** pursuant to art. 15 of the GDPR (entitled "*Right of access by the data subject*"), the Data Subject has the right to obtain from the Data Controller the confirmation that a Personal Data Processing concerning him or her is in progress and in this case, to obtain access to Personal Data in possession of this. The Data Subject can directly contact the DPO who will take charge of the request and provide a copy of all the Personal Data being processed. Although not expressly referred to herein, the provisions of art. 15 of the GDPR are applied.
2. **RIGHT TO RECTIFY PERSONAL DATA:** pursuant to art. 16 of the GDPR (entitled "*Right to rectification*") the Data Subject has the right to obtain from the Data Controller the correction of inaccurate Personal Data concerning them; the Data Subject has the right to obtain the integration of incomplete personal data, also by providing an additional declaration, taking into account the purposes of the Processing.
3. **RIGHT TO CANCELLATION OF PERSONAL DATA:** pursuant to art. 17 of the GDPR (entitled "*Right of cancellation ("right to be forgotten")*") the Subscriber or the Data Subject has the right to obtain the cancellation of the Personal Data concerning them from the Data Controller; it will therefore be Uanataca's duty to delete, without undue delay, the Personal Data being processed, provided that the reasons set out in art. 17 co. 1 mentioned above are existing and save the application of paragraphs 2 and 3.
4. **RIGHT TO REQUEST A PROCESSING LIMITATION:** pursuant to art. 18 of the GDPR (entitled "*Right to restriction of Processing*"), the Data Subject has the right to obtain the limitation of the processing from the Data Controller in all the cases provided for by art. 18 co. 1 just mentioned. In the event that the limitation of the processing takes place, the personal data subject to the limitation may be processed, except for storage, only with the consent of the Data Subject or for the assessment, exercise or defense of a right in court or to protect the rights of another natural or legal person or for reasons of significant public interest of the Union or of a Member State.
5. **RIGHT TO OBJECT:** pursuant to art. 20 of the GDPR (entitled "*Right to object*") the Data Subject has the right to object at any time, for reasons related to his particular situation, to the processing of personal data concerning him pursuant to article 6, paragraph 1, letters e) or f), including profiling based on these provisions. Following the manifestation of the interested party to want to exercise the right of opposition, the Data Controller refrains from further processing Personal Data unless he demonstrates the existence of binding legitimate reasons to proceed with the Processing that prevail over interests, rights and on the freedoms of the interested party or for the assessment, exercise or defense of a right in court. If Personal Data are processed for direct marketing purposes, the Data Subject has the right to object at any time to the Processing of Personal Data concerning him / her carried out for these purposes, including profiling to the extent that it is connected to such direct marketing. If the interested party objects to the processing for direct marketing purposes, the personal data are no longer processed for these purposes. Although not expressly referred to herein, the provisions of art. 21 of the GDPR.
6. **RIGHT TO DATA PORTABILITY:** pursuant to art. 20 of the GDPR (entitled "*Right to data portability*") the Data Subject has the right to receive the Personal Data concerning him / her provided to a Data Controller in a structured, commonly used and machine-readable format and has the right to transmit such Data to another Data Controller without hindrance by the Data Controller to which it has provided them in the cases provided for by co. 1 letter a) and

- b) of the aforementioned article. This right does not apply if the processing is necessary for the performance of a public interest task or connected to the exercise of public powers with which the Data Controller is invested.
7. **RIGHT TO WITHDRAW CONSENT ALREADY PROVIDED:** pursuant to Articles 7 co. 3 and 13 co. 2(c) of the GDPR, the Data Subject has the right to revoke his or her consent already given at any time. Revocation of consent does not affect the lawfulness of the Processing based on the consent before revocation.
  8. **RIGHT TO OPPOSE PROFILING AND AUTOMATED PROCESSING:** according to the art. 22 the Data Subject has the right not to be subjected to decisions based on automated processing, including profiling, which produce legal effects towards them or which have a similar impact on their person.
  9. **RIGHT TO PROPOSE A COMPLAINT TO THE SUPERVISORY AUTHORITY:** pursuant to art. 77 of the GDPR, the Data Subject, who believes that the processing that concerns them violates the Regulation, can lodge a complaint with a supervisory authority located within the Member State in which he resides.

We inform that the exercise of the rights of the Data Subjects referred to in the aforementioned articles, such as the right of cancellation or opposition, meets the limits imposed by the regulations applicable to the services with regard to the obligations of conservation of personal data.

Pursuant to Article 2-terdecies of the Privacy Code, in the event of death, the aforementioned rights referring to the personal data of the Data Subjects may be exercised by those who have an interest of their own, or act for their protection as an agent, or for family reasons worthy of protection. The Data Subjects may expressly prohibit the exercise of some of the rights listed above by the assignees by sending a written statement to Uanataca at the e-mail address indicated below. The declaration may be revoked or modified later in the same way.

To exercise your rights regarding the protection of personal data at any time and free of charge, you can contact the Data Protection Officer, who can be contacted by sending a request to the following address: [dpo@uanataca.com](mailto:dpo@uanataca.com), or by sending the communication by post to:

Uanataca S.A. unipersonal  
Via Diocleziano n. 107  
(80125) - Naples  
c.a.: Data Protection Officer

When contacting Uanataca, it is necessary that the Data Subjects includes his name, e-mail/postal address and/or telephone number(s) to be sure that his/her request can be handled correctly.



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