



Information on training services Customer's personal data processing

Dear Customer,

we need to process your personal data for the below mentioned purposes; according to EU Regulation 679/2016 on personal data protection, we provide the following information.

1. Data Controller

The Data Controller who determines the means and purposes of personal data processing is SMI SPA, with head office in Via C.Ceresa 10 in San Giovanni Bianco.

2. Purposes and lawfulness of data processing

The personal data collected during the employment relationship will be processed for the following purposes and legal basis:

PURPOSES <i>(why your personal data are processed)</i>	LAWFULNESS <i>(legal basis for data processing)</i>	CONSEQUENCES IN CASE OF OBJECTION TO DATA PROCESSING <i>(What happens if you object providing personal data and/or you object to data processing)</i>
Arrangement of offers you requested and/or fulfillment of the contract to which you are a legal party (quality management, planning of activities, drafting and sending of certificates of participation or other certifications, detection of the degree of customer satisfaction)	According to art 6 (1) (b), personal data, except special categories of data shall be processed to fulfill a contract to which the data subject is party or to take steps prior to entering a contract, upon the data subject's request.	For personal data not belonging to special categories, the consent is not necessary.
Compliance with accounting and tax obligations, relating to the contract	According to Art. 6 (1) (c), personal data are necessary for compliance with a legal obligation to which the Controller is subject	The consent is not required, but if you object to providing your personal data, the contract shall not continue, because data processing is necessary for legal obligations.
Promotional activities, by contacting customers with whom the company has entered a contract by using the e-mail address provided upon product/service sale, limiting the promotional activity to offering products/services similar to the sold ones.	According to art. 6 (1) (f) personal data are necessary for legitimate interests pursued by the company to carry out direct marketing activities	The consent is not requested; you can object to data processing at any time, based on art. 21, by sending your request to the Controller

3. Recipients and categories of data

Personal data disclosed for the execution of the contract shall be exclusively processed by authorized personnel or by processors appointed for that purpose.

For the purposes of the processing, the Data Controller may become aware of categories of personal data such as racial or ethnic origins, images of teleworking or teleconferencing sessions.

Besides legal obligations, personal data can be disclosed to the following categories of recipients: Teaching staff of the courses, companies of the entrepreneurial group, consultants related to the execution of the contract.

4. Data transfer abroad

Your personal data shall not be transferred out of the European Union.

5. Data storage period and criteria used to determine that period

Personal data shall be collected and stored for the purposes mentioned here below.

CATEGORY OF DOCUMENTS	STORAGE CRITERIA
Contrat and relating documents	At least 10 years after employment termination



SMI S.p.A. con Unico Socio

Sede amministrativa:

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Società sottoposta a direzione e coordinamento da SMIGROUP S.p.A.
Sede legale: Via Monte Grappa, 7 - 24121 Bergamo (BG) - ITALIA

Accounting/fiscal documents	10 years from their issue
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6. Rights of the data subject

You are entitled to exercise your rights under this Regulation in respect of and against the Controller.

- **Right of access:** according to art.15 of EU Regulation you have the right to obtain from the controller confirmation as to whether or not your personal data are being processed, and, where that is the case, access to your data.
- **Right to rectification:** according to art. 16 of EU Regulation you have the right to obtain from the controller without undue delay the rectification of inaccurate personal data. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, also by providing a supplementary statement.
- **Right to erasure:** according to art. 17 of EU Regulation you have the right to obtain from the controller the erasure of your personal data without undue delay where one of the provisions of the regulation applies.
- **Right to restriction of processing:** according to art. 18 of EU Regulation, you have the right to obtain from the controller restriction of processing where one of the provisions of the Regulation applies.
- **Right to object:** according to art. 21 of EU Regulation, you have the right to object to processing of your personal data at any time on grounds relating to your particular situation, based on art. 6 (1) point (e) or (f), including profiling based on those provisions.
- **Right to data portability:** according to art. 20 of EU Regulation, you have the right to receive your personal data, which you provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided.
- **Right to withdraw your consent:** according to art. 7 of EU Regulation, you have the right to withdraw your consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.
- **Right to lodge a complaint:** according to art. 77 of EU Regulation, you have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement, if you consider that the processing of your personal data infringes this Regulation.

7. Further information

For further information, for consulting our privacy policy or for receiving an abstract of the articles of the EU Regulation, you can write to the Controller's e-mail address privacy@smigroup.net. Your requests to exercise your rights can be sent in writing to the Controller, together with a valid identity document.

8. Co-operation

Data protection and compliance with the EU Regulation, especially with transparency principle, are crucial values for our Group; we would be grateful if you could help us by notifying the Controller of any difficulties of intelligibility or suggesting any improvements to be adopted.