



National Service Company s.r.l. - Strada Regina, 29 - 62018 Potenza Picena (MC) – Italy

Tel. 0039.0733.870901 (7 linee r.a.)

INFORMATION FOR THE PROCESSING OF PERSONAL DATA

(pursuant to European Regulation 679/2016, Articles 13/14)

Dear Customer

pursuant to Articles 13/14 of the *European Regulation 679/2016 concerning the protection and processing of personal data, as well as the free movement of such data* and which repeals directive 95/46 / EC (general data protection regulation), We invite you to read the following information carefully as it contains important information on the protection of personal data and on the security measures adopted to guarantee confidentiality in full compliance with the applicable legislation.

OWNER OF THE TREATMENT AND PLACE OF DATA PROCESSING

NATIONAL SERVICE COMPANY SRL_N.SC SRL (hereinafter Company or Owner), with registered office in Via Strada Regina 29 - 62018 Potenza Picena (MC), PI | CF 00916530439, as Data Controller of personal data pursuant to EU Regulation 679/2016 and Legislative Decree 196/2003, updated to Legislative Decree 101/2018, acknowledges the importance of personal data protection and considers their protection a fundamental goal; for this reason it intends to guarantee its customers, as well as all the natural persons with whom it maintains relationships, even if only informative, the maximum transparency regarding the processing of their personal data.

The data processing takes place at the headquarters of the Data Controller and at the premises of the identified third parties.

DATA PROTECTION OFFICER (RPD–DPO)

In consideration of the main activity carried out, as well as the large-scale processing of the acquired data, the Data Controller has proceeded to appoint the Data Protection Officer (RPD or Data Protection Officer) to fulfill the functions required by the EU Regulation. The Data Protection Officer can be contacted at gdpr@nationalservicecompany.it.

PURPOSE AND LEGAL BASIS OF THE TREATMENT

The treatment (Article 4, paragraph 2, of the European Reg.: “any operation or set of operations, performed with or without the aid of automated processes and applied to personal data or sets of personal data, such as the collection, registration, organization, structuring, conservation, adaptation or modification, extraction, consultation, use, communication by transmission, diffusion or any other form of making available, comparison or interconnection, limitation, cancellation or destruction any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction”) of personal data (Article 4, paragraph 1.: “any information relating to an identified or identifiable natural person (“interested”); an identifiable natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more specific elements of your to physical, physiological, genetic, psychic, economic, cultural or social identity any information relating to an identified or identifiable natural person (“data subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”) is necessary for:

1. activities for the execution, management and conclusion of the contract for the provision of services in your favor (Article 6, paragraph 1, letter b). The personal data relating to the contract essentially concern personal and commercial data (company name, address, telephone and telematic numbers), as well as data that can be inferred from the requested services. Such data will also be processed using IT tools and procedures.

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E-mail: info@nationalservicecompany.it - marketing@nationalservicecompany.it
finance@nationalservicecompany.it - techoffice@nationalservicecompany.it
purchasing@nationalservicecompany.it - quality@nationalservicecompany.it



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2. Fulfillments in tax, legal and accounting matters to be paid by the Data Controller established by law, national or community regulations, provisions issued by Authorities or by supervisory and control bodies (Article 6, paragraph 2, letter c);
3. for the pursuit of the legitimate interest of the data controller or of third parties, provided that the interests or fundamental rights and freedoms of the data subject who require the protection of personal data do not prevail, in particular if the data subject is a minor (Art. 6, paragraph 1, letter f);

The collection and processing of personal data for purposes from 1 to 3 is not mandatory but the total and/or partial refusal of their provision could not allow the Data Controller to execute the contract of which he is a part, thus making it impossible to perform the related service.

In particular, as an example, the data will be processed for:

- in relation to point 1), the management of the contractual relationship, to implement the activities preliminary to and consequent to the contract itself;
- in relation to point 2), to proceed with the related invoicing and payment management, as well as the fulfillment of any other consequent obligation;
- in relation to point 3), the management of unpaid debts also through responsible companies, promotional activities (cit. *Soft Spam* Recital 47 of the European Reg.) which, even without consent, the Data Controller may carry out through the contact data communicated for the purposes direct sale of services similar to those covered by the existing contract, unless you explicitly object.

The data can also be processed to evaluate collaboration and/or work proposals. This activity involves the evaluation and processing of identification, judicial and/or health data possibly contained in the attached Curriculum Vitae, but only on the basis of an autonomous and specific consent. It is represented that, on the basis of the provisions in force, this information, in the cases of curricula spontaneously transmitted by the interested parties, may be provided at the time of the first useful contact, following the sending of the curriculum itself.

TYPE OF DATA PROCESSED AND NATURE OF THE PROVISION

To execute contract requests, it is necessary and, in some cases mandatory by law, to collect and process certain data such as, but not limited to:

General personal data

Personal data, business or company name, gender, identification document number, tax code, address and telephone number, e-mail, PEC/Registered Electronic Mail, tax data, bank details, data relating to payment tools, including electronic ones (e.g., credit cards), data relating to economic and commercial activity.

Personal identification data of natural persons connected to you consisting of general personal data, such as, for example, personal data (name, surname, address, telephone number, e-mail and other contact details, an identification number, etc.).

Banking, financial, corporate data, balance sheets or data of economic and fiscal nature, if functional to the correct performance of the assigned tasks, and of the natural persons connected to it.

DATA PROCESSING AND STORAGE METHODS

Based on the Art. 5 of the European Regulation "*Principles applicable to the processing of personal data*", the data are processed in a lawful, correct and transparent manner in relation to the interested party ("lawfulness, correctness and transparency"); collected for specified, explicit and legitimate purposes ("purpose limitation"), adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ("data minimization"), accurate and, if necessary, updated ("accuracy") and processed in such a way as to ensure adequate security, including protection, by means of appropriate technical and

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organizational measures, against unauthorized or unlawful processing and against accidental loss, destruction or damage ("integrity and confidentiality"). Personal data is processed using IT and paper tools, for the time strictly necessary to achieve the purposes for which it was collected or until the mandatory statute of limitations has expired pursuant to applicable regulations in force (for example, 10 years of storage time for accounting and administrative documents).

No automated processing is envisaged and no type of profiling or automated decision-making process is carried out. Specific security measures in line with the provisions **of Art. 32 of the European Regulation** are observed to prevent data loss, illicit or incorrect use and unauthorized access. The Data Controller carries out a treatment based on the principle of Privacy by Design, which requires that the protection of the rights and freedoms of the interested parties with regard to the processing of personal data involves the implementation of adequate technical and organizational measures at the time of both the planning and execution of the treatment itself, in order to guarantee compliance with current legislation. Based on the principle of Privacy by Default, the Data Controller also adopts adequate technical and organizational measures to guarantee the treatment, by default, only of the data necessary for each specific purpose.

SCOPE OF COMMUNICATION AND/OR DISSEMINATION

The data being processed are processed, solely and exclusively for the performance of activities relating to the aforementioned purposes, to authorized third parties and/or employees, in particular:

- subjects delegated and/or appointed by the Data Controller to carry out technical maintenance and/or installation of electronic equipment strictly related to the performance of security services;
- subjects who provide services for the management of the IT system and communication networks and take care of the maintenance of the technological part (including e-mail, hosting, cloud, etc.);
- freelancers, consulting firms or companies who provide assistance for accounting obligations, personnel management, safety in the workplace;
- subjects who can access the data under the provisions of the law or secondary or community legislation;
- Third parties who perform services for the Owner on the basis of specific contracts.

In case of communication of data to third parties on the basis of co-ownership agreements, be informed that this co-ownership is based on the sharing of data and the purposes of the processing, in the context of the services requested or envisaged in its favour, including the activity relating to the proposition and conclusion of the contract and to perform the related regulatory obligations.

The subjects belonging to the aforementioned categories have presented sufficient guarantees to implement adequate technical and organizational measures and, where they cannot be identified as *Independent Data Controllers*, have been appointed as *Data Processors* with a formal and written deed, undertaking to process the data only on documented instructions from the Data Controller. The list of managers is constantly updated and available, upon request, at the headquarters of the Data Controller. The undersigned, as Data Controller, has taken steps to train the authorized personnel on the rules established by current legislation on personal data.

The data will not be disseminated.

EXTRA-EU DATA TRANSFER

Data transfers to non-EU countries are not contemplated. In such event, the transfer of personal data to countries that do not belong to the European Union and which do not ensure adequate levels of protection, will be carried out only after the conclusion of a specific agreement between the Data Controller and the third party recipient of the data containing safeguard clauses and appropriate guarantees for the protection of personal data.

RIGHTS OF INTERESTED PARTIES

Pursuant to Chapter III of European Regulation 679/2016, you may exercise the following rights:

- a) the right to obtain confirmation from the Data Controller if personal data concerning yourself is being processed and, if so, to obtain access to such personal data (Article 15);
- b) right of rectification (Article 16);

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- c) right to cancellation (Article 17);
- d) right to limitation of treatment (Article 18);
- e) right to data portability (Article 20);
- f) right to object (Article 21);
- g) right to not be subjected to a decision based solely on automated processing, including profiling, which produces legal effects concerning yourself or which significantly affects your person in a similar way (Article 22);
- h) right to withdraw your consent at any time without prejudice to the lawfulness of the treatment based on the consent given before the revocation (Article 7, paragraph 3);
- i) right to file a complaint with the supervisory authority (Article 77);
- j) right to an effective judicial remedy against the supervisory authority (Article 77) or against the Data Controller or Processor (Article 79).

You can at any time request more information from the Data Controller at the following email gdpr@nationalservicecompany.it or by registered letter with return receipt addressed to the data controller indicated above, specifying the subject of the request, the right you intend to exercise and attaching a photocopy of an identity document certifying the legitimacy of the request.

You can request at any time more information from the Data Controller, by sending an email at gdpr@nationalservicecompany.it or a registered letter with return receipt addressed to the Data Controller indicated above, specifying the subject of the request, the right you intend to exercise and attaching a photocopy of an identity document certifying the legitimacy of the request.

COMPLAINT

If you believe that the processing of your personal data has been carried out unlawfully, you can file a complaint with one of the competent supervisory authorities for compliance with the rules on the protection of personal data. In Italy, the complaint can be presented to the Guarantor for the Protection of Personal Data. More information on how to proceed is available on the Guarantor's website at <http://www.garanteprivacy.it>

The Data Controller reserves the right to modify and/or update this information on the basis of legislative and regulatory developments that may affect the Applicable Regulations, in the face of any interventions by the competent Authority for the protection of personal data.

Potenza Picena (MC) 16/01/2023

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