**INFORMATION FOR THE PROCESSING OF PERSONAL DATA IN ACCORDANCE WITH EU REG. 16/679**

**1. Identity of the Data Controller and contact details**

Pursuant to current legislation and the provisions of Article 13 of the EU Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (hereinafter "Regulation"), we inform you that the Data Controller of the data you provide is

Duepuntozero NPL S.P.A., Registered, administrative and operational office: Corso Monforte, 15 - 20122 MILANO

Mail: info@duepuntozero.net Tel: 02 83540750

Mail PEC: duepuntozeronpl@legalmail.it

**2. Data Protection Officer**

The Data Controller has, in addition, appointed a Data Protection Officer ("Data Protection Officer" or "DPO"), who can be contacted at the following email address

e-mail: dpo@duepuntozero.net

**2. Purpose and legal basis of the processing**

Your data will be processed mainly by computer and telematic means, for the purposes provided for in Regulation (EU) 2016/679 (GDPR), in particular for the following purposes:

A) Navigation data

The computer systems and software procedures responsible for the operation of the Site acquire, in the course of their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols. These are.

This category also includes data processed through the use of cookies. On this point, please refer to the provisions of the specific Cookie Policy.

B) Data related to requests from the data subject

We may process information contained in any request for information you send us regarding goods and/or services ("request data"). The legal basis for this processing is the performance of a contract or pre-contractual measures triggered at the request of the data subject.

The provision of your data is obligatory insofar as it is necessary for the fulfillment of the legitimate interest of the data controller or the performance of pre-contractual or contractual obligations arising from the requested supply and, in any case, for the fulfillment of legal obligations to which the data controller is subject.

The provision of your data for the purposes referred to in points A and B is mandatory as the processing is necessary for the provision of the Services or for the response to requests from the data subject.

**3. Destinatari dei dati personali**

Where strictly necessary for the pursuit of the above purposes, your personal data may also be communicated:

- to employees and collaborators of the Data Controller, in their capacity as authorized data processors (or so-called “data processors”);
- third parties who perform outsourcing activities on behalf of the Data Controller, in their capacity as data processors;
- to judicial or supervisory authorities, administrations, agencies and public bodies;
- to companies and professional operators who provide electronic data processing and consulting services for software and information technology as well as management of information services related also to hosting and website management;

**4**. **Data Transfer to Third Countries.**

Your personal data will be processed by the Data Controller within the territory of the European Union.

If for technical and/or operational issues it becomes necessary to use subjects located outside the European Union, or it becomes necessary to transfer some of the collected data to technical systems and services managed in the cloud and located outside the area of the European Union, the processing will be regulated in accordance with the provisions of Chapter V of the Regulations and authorized under specific decisions of the European Union. Therefore, all necessary precautions will be taken in order to ensure the most complete protection of personal data by basing such transfer: a) on adequacy decisions of the third country recipients expressed by the European Commission; b) on adequate guarantees expressed by the third party recipient in accordance with art. 46 of the Regulation; c) on the adoption of binding corporate rules, so called Corporate binding rules.

**5**. **Period of data retention**

Your personal data will be retained for the period of time strictly necessary for the pursuit of the specific purposes indicated above in compliance with civil and fiscal retention obligations and the limits provided by law;

In some cases it is not possible to specify in advance the periods of retention of personal data. In these cases, we will determine the retention period based on the following criteria: necessity, legal obligation, our legitimate interest.

**6. Rights of the Interested Party**

Data subjects have the right to request from the data controller access to and rectification or erasure of personal data or restriction of processing concerning them or to object to processing (Articles 15 and 21 of the GDPR).
The interested parties, if the prerequisites are met, also have the right to lodge a complaint with the Guarantor as the Supervisory Authority in accordance with the established procedures.

More specifically, at any time, the following rights may be exercised:

a. Access to personal data: obtain confirmation or otherwise that a processing of data concerning you is taking place and, if so, access to the following information: the purposes, the categories of data, the recipients, the period of storage, the right to request rectification or cancellation or restriction of processing or opposition to the processing itself as well aś the existence of an automated decision-making process including profiling and the logics used;

b. Request for the rectification or erasure of the same or limitation of processing concerning you; “limitation” means the marking of the data stored with the aim of limiting their processing in the future;

c. for the performance of a public interest task or the pursuit of a legitimate interest of the Holders;

d. Portabilitỳ of data: in the case of automated processing carried out on the basis of consent or in performance of a contract, to receive in a structured, commonly used and machine-readable format the data concerning you;

e. Revocation of consent to processing for purposeś of marketing, both direct and indirect, market research and profiling; the exercise of this right does not affect in any way the lawfulnesś of the processing carried out prior to revocation;

f. To lodge a complaint pursuant to Article 77 of the GDPR with the competent Supervisory Authorityỳ based on your habitual residence, place of work or the place of violation of your rights; for Italy, the competent authority is the Garante per la protezione dei dati personali, which can be contacted through the contact details given on the website http://www.garanteprivacy.it

The aforementioned rights may be exercised by sending an appropriate request to the Data Controller through the contact channels indicated in Article 2 of this policy.

Requests relating to the exercise of your rights will be processed without undue delay and, in any case, within one month of the request; only in cases of particular complexitỳ and number of requests this deadline may be extended by an additional 2 (two) months.

**7. Updates**

This policy is effective as of _____

We may update this policy from time to time by posting a new version on our website.

You should check this page occasionally to make sure you are happy with any changes to this policy.

We may notify you of significant changes to this policy via email or other communication systems.