



Weltix

Weltix Fiduciaria S.p.A.

Notice on the Processing of Personal Data **Website Navigation**



Notice on the processing of personal data – privacy policy – Website navigation

Weltix Fiduciaria S.p.A. (hereinafter also the “Data Controller”) provides the Data Subject – i.e. the person to whom the personal data relate – with the following information pursuant to Article 13 of the European Regulation on the protection of personal data (Regulation (EU) No. 2016/679, hereinafter also “GDPR”). This notice is intended to describe the characteristics of the processing carried out in relation to the personal data provided by the Data Subject and the measures adopted to protect their rights.

This notice is published on the Weltix Fiduciaria S.p.A. website at: www.weltix.tech (hereinafter also the “Website”) in the section dedicated to the personal data processing policy on the Website’s home page.

Data processed, purpose, retention period and legal basis of processing

DATA PROCESSED	PURPOSE	RETENTION PERIOD	LEGAL BASIS
• User identification data, such as, for example, IP addresses and computer domain names • Data relating to the User’s use of the Website • Data voluntarily provided by the User in order to access certain services offered through the Website (please refer to the specific notices in the relevant sections of the Website) • Data voluntarily provided by the User by sending an email • Cookies. These consist of text files that are automatically generated on the User’s computer following a visit to certain pages of the Website (for further information, please refer to the cookie policy).	a. To manage the correct use of the Website. a. To manage the User’s requests for information. a. To carry out both direct and profiled marketing activities by means of third-party cookies. a. To ascertain any unlawful acts committed by users to the detriment of third parties or of the Data Controller. a. To comply with European and national legislation, as well as with measures issued by the Data Protection Authority.	The data processed will be retained as further specified in the relevant notices.	• Legitimate interest of the Data Controller (managing the correct use of the Website and ascertaining any unlawful acts committed by users to the detriment of third parties or of the Data Controller). • Consent of the Data Subject expressed during the browsing experience (e.g. use of cookies).

Methods of processing personal data

Personal data are processed in pursuit of the Purposes indicated in this notice, including by automated means on electronic media.

Mandatory or optional nature of the provision of data

The provision of the data required to pursue the Purposes set out

- under letters (a) (d) (e) is **mandatory** and refusal to provide such data will not allow the Data Subject to browse the Website and make use of the services offered by the Platform.
- Under letters (b) (c) it is **optional** and refusal to provide such data will make it impossible for the Data Subject to receive a response to the requests made.

Categories of recipients to whom personal data may be disclosed

The processing of the personal data provided may be carried out, in compliance with the principle of strict necessity of the processing, both by internal personnel (Article 29 of the GDPR or Article 2 *quaterdecies* of Legislative Decree No. 101/2018) and by external parties (Article 28 of the GDPR).

Within Weltix Fiduciaria

The data will be processed by personnel belonging to the following departments:

- Administrative Department
- Marketing and Customer Service Departments

Outside Weltix Fiduciaria

The data will be processed by parties belonging to the following macro-categories:

- service providers engaged by the Data Controller to carry out activities instrumental to achieving the Purposes (e.g. software providers, cloud partners, data centres, consultants). Service providers appointed as External Data Processors (Article 28 GDPR) will be subject to contractual and regulatory obligations in order to maintain the confidentiality of the data and will only have access to the information necessary to carry out their functions. A complete named list of the External Data Processors is made available upon request by the Data Subject.
- Third parties, acting as independent Data Controllers, whose right to access the Data Subject's personal data is recognised by provisions of European Union law or Italian law (e.g. competent Authorities for the fulfilment of legal obligations, and public Administrations for their institutional purposes).

Dissemination of data

The data will under no circumstances be disseminated.

Rights of the Data Subject

The Data Subject may exercise the following rights against the Data Controller:

- **Right of access:** the right to obtain a copy of the personal data we hold and that are subject to processing.
- **Right to rectification:** the right to rectify the personal data held by the Data Controller where they are not up to date or accurate.
- **Right to object** to the processing of personal data for commercial Purposes: the Data Subject may request that the Data Controller cease sending commercial communications at any time.
- **Right to object** to decisions based solely on automated processing: the Data Subject may request not to be subject to decisions based solely on automated processing, including profiling.
- **Right to withdraw** consent given: the right to withdraw consent given for a specific processing activity at any time.
- **Right to lodge a complaint with the Data Protection Authority:** the right to lodge a complaint with the Data Protection Authority should the Data Subject have concerns regarding the processing of personal data carried out by the Data Controller.

The Data Subject may also exercise the following rights where certain circumstances apply:

- **Right to erasure:** the Data Subject may request that the Data Controller erase their personal data where the purposes of the processing have ceased and there are no legitimate interests or legal provisions requiring its continuation.
- **Right to object** to a processing activity: the Data Subject may request that the Data Controller cease carrying out a specific processing activity on the Data Subject's personal data.
- **Right to restrict** processing: the right to request that the Data Controller restrict the processing operations carried out on the Data Subject's personal data.
- **Right to data portability:** the right to obtain a copy of the data in a structured, commonly used and machine-readable format from another Data Controller.

To exercise any of the above-mentioned rights, the Data Subject may send an email or write to the following address, specifying the request and providing the Data Controller with the information necessary to correctly identify the sender (also attaching a copy of their identity document):

- by email: privacy.fiduciaria@weltix.tech
- by post: Weltix Fiduciaria S.p.A., Milan, Piazzale Cadorna No. 13 – 20123

Weltix Fiduciaria will respond within one month. If for any reason the Data Controller is unable to respond, it will provide a detailed explanation of why it cannot fulfil the request.

Data Controller

The Data Controller is Weltix Fiduciaria S.p.A., with registered office in Milan, Piazzale Cadorna No. 13 – 20123 – VAT No. 10879140969 - email: privacy.fiduciaria@weltix.tech