

## GEM srl

Via dei Campi, 2  
55049 Viareggio (LU)  
VAT number 01544010463  
Certified email:  
gemsrl@interfreepec.it  
Doc. Code 14313.51.443377.0



## Personal data processing policy pursuant to articles 13-14 of EU Reg. 2016/679

### Data subjects: users of the GEM APP.

GEM srl, in its capacity as Data Controller of your personal data, pursuant to and for the purposes of EU Reg. 2016/679, hereinafter 'GDPR', hereby informs you that the aforementioned legislation provides for the protection of data subjects with respect to the processing of personal data and that such processing shall be based on the principles of fairness, lawfulness, transparency and of the protection of your privacy and rights.

Your personal data will be processed in accordance with the legislative provisions of the aforementioned law and the confidentiality obligations set out therein.

The purposes and legal basis of said processing are: specifically, your data will be processed for the following purposes regarding the implementation of legal obligations:

- the establishment of liability in the event of hypothetical computer crimes against the website or third parties.

Your data will also be used for the following purposes relating to the adoption of measures regarding contractual or pre-contractual obligations:

- access to the Application and use of related services;
- statistical purposes.

Your personal data may also be used, with your consent, for the following purposes:

- geolocation of the application user.

You have the option of refusing the use of your data for the aforementioned purposes, but such a refusal shall not affect the continuation of the relationship or the adequacy of the data processing itself.

Processing methods. Your personal data may be processed in the following ways:

- by means of electronic computers using software systems operated by Third Parties;
- processing by means of electronic computers.

All processing is carried out in accordance with the methods set forth in articles 6, 32 of the GDPR and through the adoption of the appropriate security measures envisaged.

Your data will be processed only by personnel expressly authorized by the Data Controller and, specifically, by the following categories of authorized personnel:

- Sales Department;
- Marketing Department;
- Product Specialist Office;
- Quality Office.

Communication: your data may be communicated to third parties for the proper management of the relationship and, specifically, to the following categories of recipients, including all duly appointed Data Processing Managers:

- Agents;
- Distributors;
- web agencies, social media marketing, hosting providers.

Data sharing: Your personal data will not be disseminated in any way.

Data Retention Period. Please note that, in compliance with the principles of legality, limitation of purpose and data minimization, pursuant to article 5 of the GDPR, the retention period for your personal data is established as:

- the period of time strictly necessary to achieve the purposes for which the data was collected and processed in order to execute and fulfil contractual purposes;
- the period of time strictly necessary for the delivery of the services provided.

Data Controller: the Data Controller, according to the law, is GEM srl (Via dei Campi, 2, 55049 Viareggio (LU); VAT number 01544010463), represented by the person acting as its legal representative pro tempore.

The Data Protection Officer (DPO) designated by the controller pursuant to Article 37 of the GDPR is:

- Dr Miriam Carmassi (contact details: email [dpo@gemitaly.it](mailto:dpo@gemitaly.it)).

You have the right to obtain from the data manager the erasure (the right to be forgotten), limitation, updating, rectification and portability of your personal data and to oppose the processing of your personal data, and in general you may exercise all those rights set out in articles 15, 16, 17, 18, 19, 20, 21, 22 of the GDPR.

You may also view the updated version of this policy at any time by logging on to:

<https://www.wivacY.lab.it/informativa.RhR?14313443377>.

## EU Reg. 2016/679: Articles 15, 16, 17, 18, 19, 20, 21, 22 - Rights of the Data Subject

1. Data subjects have the right to obtain confirmation of the existence or non-existence of their personal data, even if not yet recorded, to receive communication thereof in an intelligible form and to make complaints to the supervisory authority.
  
2. The data subject has the right to obtain information on:
  - a. the origin of personal data;
  - b. the purposes and methods of data processing;
  - c. the logic applied in the case of processing carried out with the aid of electronic instruments;
  - d. the identity details of the data controller, data managers and the designated representative in accordance with article 5, paragraph 2;
  - e. the subjects or categories of subjects to whom the personal data may be communicated or who may become aware of it in their capacity as a designated representative in the territory of the state, as managers or as appointees.
  
3. The data subject has the right to obtain:
  - a. data updates, correction or, when required, integration;
  - b. the deletion, anonymization or blocking of data processed unlawfully, including data for which storage is unnecessary for the purposes for which the data was collected or subsequently processed;
  - c. affirmation that the operations under a) and b) have been notified, including with regards to their contents, to those to whom the data was communicated or shared, except where this requirement is not possible or involves the use of means that are disproportionate to the right being protected;
  - d. data portability.
  
4. Data subjects have the right to object, in whole or in part:
  - a. for legitimate reasons, to the processing of their personal data, even if pertinent for collection purposes;
  - b. to the processing of their personal data for the purpose of sending advertising material, for direct sales or for carrying out market research or marketing communications.

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### Data subject's consent

Date: .....	Place:
Name, Surname:	

Do you give your consent to the processing of personal data for the optional purposes below?

**YES**  **NO**    Geolocation of the application user

The interested party:

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