

PRIVACY POLICY

INFORMATION ON THE PROCESSING OF PERSONAL DATA pursuant to art. 13 of EU Regulation 2016/679, General Data Protection Regulation ("GDPR")

This information or Privacy Policy is provided for the site www.sutterprofessional.it and, unless otherwise specified, in relation to websites www.sutteracademy.com, connect.sutterprofessional.it, and/or other websites corresponding to sub-domains dedicated to specific initiatives, as well as to the application for mobile devices. Any changes and/or additions to this list will be communicated and brought to the knowledge of the user during an update of this Privacy Policy.

The www.sutterprofessional.it website, the other sites indicated above and the mobile application will hereinafter be referred to individually as "Site".

Please also note that any third-party websites referred to through links on this Site are governed by a separate privacy policy which is irrelevant to this one.

The information is intended for all those who interact with the web pages of the Site, both those who use the site without registering, and those who, at the end of the appropriate procedure, register with the Site and use the on line services provided through the same.

This information is provided pursuant to art. 13 GDPR and is inspired by the provisions of the Recommendations adopted by the European Authorities for the Protection of Personal Data, gathered in the Group established by art. 29 of Directive no. 95/46/EC in order to identify the minimum requirements for the collection of personal data on-line and through apps, and their subsequent amendments and additions.

DATA CONTROLLER	Sutter Professional S.r.l. Località Leigozze, 1 Borghetto di Borbera (Alessandria) VAT number 01336470065 ("Sutter Professional", "Company" or "Controller")
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PERSONAL DATA
PROCESSING SCOPE

In addition to anything else provided on other pages (in particular with reference to "Cookies"), the following data may be collected and processed through the Site and the use of the related functions and/or subscription to the services provided therein:

- navigation data: are the data that the server automatically registers at every site visit, such as IP addresses or domain names of the computers used by users who connect to the Site, the addresses in URI notation (Uniform Resource Identifier) of the requested resources, the time of the request, the method used in submitting the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (success, error, etc.) and other parameters relating to the user's operating system and to the computer environment;
- common and identifying personal data: this category includes name and surname, address, e-mail address, company of belonging and any additional contact data provided by filling in the electronic forms, from time to time, published on the Site;

In addition to the above, Sutter Professional offers the opportunity to submit your candidacy on-line for job positions, from time to time, published on the Site, through the "Work with us" page. Through the electronic form published on this page, the name and surname, date of birth, address, email address, telephone number, educational qualification, as well as further information provided through the uploaded curriculum vitae will be collected. Interested parties are encouraged not to include particular categories of personal data (and, in particular, health data) in their own curriculum vitae.

LEGAL BASIS AND
PURPOSE OF DATA PROCESSING

The processing of personal data is based on the existence of a contractual or legal obligation or, depending on the case and as further specified in the following paragraph, on the existence of a legitimate interest of the Company or on the user's consent, optional and revocable in any moment, and is exclusively aimed to achieve the following purposes:

- (i) in fulfilment of contractual and pre-contractual obligations - to guarantee the registration on the Site and the correct provision of the services requested through the Site and/or through the forms made available thereto, to allow better use of the services and a better navigation environment, and with specific reference to the data entered in the page "Work with us", to consider and evaluate the application and to contact the candidate to schedule an interview, thus following up on a specific request, as well as to manage and to process the questions and the applications of interactions with the Company and the referable subjects to the organization of the Controller.
- (ii) in fulfilment of legal obligations - for the fulfilment of obligations deriving from the law or regulations, national and/or Community, in force, included in the tax area, as well as provisions issued by pertinent authorities and bodies;
- (iii) by virtue of a legitimate interest of Sutter Professional - for the defence in court of a right or interest before any pertinent authority or body (including in the field of computer crimes); for conducting statistical analyses and market research on aggregated data; for sending, by e-mail, information notices about similar products or services (so-called soft spamming) to those subject to a previous commercial or contractual contact and unless such processing is denied by the user.

It is understood that in no case will the data acquired through the "Work with us" page be processed for soft-spamming purposes.

<p>COMPULSORY OR OPTIONAL PROVISION OF DATA</p>	<p>The provision of data for the purposes referred to in points (i) (fulfilment of contractual obligations), (ii) (fulfilment of legal obligations) and (iii) (legitimate interest of Sutter Professional) mentioned above is purely optional. However, as such processing is necessary to allow for Site registration and the provision of services offered through the latter, including those arising and/or related to the submission of an application for open positions as per the page "Work with us", failure, partial or incorrect provision of the data in question will make it impossible, depending on the case, to register with the Site and/or to use the services provided on line and, in general, to proceed with the establishing or established contractual relationship and/or to fulfil the obligations as provided by the contract or by applicable law or, furthermore, to fulfil specific user requests.</p>
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<p>COMMUNICATION OF DATA</p>	<p>The data may be communicated to the following categories of subjects ("recipients"):</p> <ul style="list-style-type: none"> - to all those parties (including public authorities) with access to personal data under legislative or administrative provisions; - to all those subjects, public and/or private, natural and/or legal persons to whom the communication is necessary or functional for the correct fulfilment of a contractual or legal obligation. <p>In addition to the above, for the pursuit of the purposes described above, personal data may be made known to persons working on behalf of the Company, such as, by way of example only, and not limited to,</p> <ul style="list-style-type: none"> • companies, consultants or professionals who may be in charge of site installation, maintenance, updating and, in general, hardware and software management; • to companies or professionals in charge of sending documentation and/or informative material, • to the Company's legal and tax professionals and advisers <p>who will process them as external data processors for the processing of personal data on behalf of Sutter Professional. A nominative and updated list of persons appointed as data processors is available at the Company's headquarters.</p> <p>In any case, personal data will not be transferred to non-EU countries or outside the European Economic Area.</p>
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<p>DATA RETENTION PERIODS</p>	<p>Personal data will be kept for the entire duration of the contractual relationship (and, as regards the data acquired through the "Work with us" page, for the time necessary to evaluate the application and for the whole selection phase and procedure) and, subsequently, for the maximum time provided for by the applicable legal provisions on the limitation of the rights and/or forfeiture of the action (also in the administrative-fiscal area) and, in general, to exercise/defend the rights of Sutter Professional in the disputes promoted by public authorities, public entities/bodies and private subjects.</p>
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MINORS UNDER THE AGE OF 16

The Site does not contain information or functions or services directly intended for users under the age of 16.

Minors must not provide information or personal data without the consent of their parental guardians.

Therefore, all users under the age of 16 are not required to communicate their personal data under any circumstances without the prior authorisation of a parent or guardian. If the Company becomes aware of the fact that personal data have been provided by a minor (under 16 years of age), the Company will immediately destroy them or request the appropriate consent from parents (or guardians), also reserving the right to inhibit access to the services available on the Site to any user who has concealed their minor age or who has in any case communicated their personal data without the consent of their parents (or guardians).

RIGHTS

As a data subject, the user has the right to ask the Controller to exercise the following rights:

Right of access You may request confirmation of the existence or otherwise of processing your personal data and, if so, to access such data and specific information on the processing, such as, for example, the purposes, the categories of data processed, the existence of the other rights indicated below. You can also ask for a copy of your data.

Right of rectification You have the right to request and obtain correction of your personal data and/or the integration of incomplete personal data.

Right of erasure You may obtain the deletion of your data, without unjustified delay, inter alia, if (i) such data are no longer necessary for the purposes for which they were collected, (ii) you object to the processing of your data (as indicated below) and there is no other legitimate prevalent reason for the processing, (iii) the data are processed unlawfully, (iv) the data must be deleted pursuant to a legal obligation, (v) personal data of a minor under 16 years of age were collected in relation to the supply of company services.

Please note that this right does not apply if data processing is necessary, inter alia:

- for the fulfilment of a legal obligation;
- for the assessment, exercise or defence in court of a right.

Right to restriction You have the right to obtain the processing restriction in case of:

- dispute the accuracy of personal data concerning you within the time necessary to the controller (Company) to verify the accuracy of this data;
- unlawful processing and your request to limit use instead of the relative cancellation;
- necessity on your part of the data for the assessment, exercise or defence of a right in court;
- denial by you to the processing, as indicated below, pending verification of the prevalence of legitimate reasons by the controller.

Right to portability In the event of automated processing, you have the right to receive the personal data that concerns you in a structured, commonly used and machine-readable format and transmit those data to another data controller.

You also have the right to have the personal data transmitted directly from one controller to another, where technically feasible.

The possibility of obtaining the cancellation of data, as indicated above, remains.

Right to object You have the right to oppose processing at any time on a legitimate interest of the controller, except for the proof by the latter of legitimate binding reasons to proceed with the processing that prevail over the interests, fundamental rights and freedoms of the data subject or the assessment, exercise or defence of a right in court.

Lastly, you have the right to file claims with the Supervisory Authority (<http://www.garanteprivacy.it/>).

The above rights may be exercised by request sent to the Controller without formalities. The request can be sent to the Data Controller by letter or e-mail to the following addresses: Località Leigozze, 1, Borghetto di Borbera (Alessandria)- email: privacy@sutter.it .

This Privacy Policy was, lastly, updated in the month of June 2018.

This Privacy Policy may be subject to further updates. The Controller kindly requests users to periodically visit this page to learn of any changes or updates.