

PRIVACY POLICY

This Privacy Policy is published by ACTION ICT S.r.l., with registered office in Milan, Via Medici n.8 , 20123 Milan (Italy), VAT number 03187630128 (hereinafter ACTION ICT), pursuant to articles 13 and 14 of Regulation (EU) 679/2016 on the protection of personal data (hereinafter GDPR), in order to provide some relevant information about the use of personal data collected.

ACTION ICT is the data controller and is responsible for the acquisition, use, transmission, storage and protection of personal data in compliance with this Privacy Policy and current legislation.

The privacy policy relates only to this site and does not concern any other external websites to which the user could access through links on the site itself, so it will be provided in the appropriate notice.

Following consultation of this site, data relating to identified or identifiable persons may be processed.

1. Data Controller

ACTION ICT S.r.l. with registered office in Via Medici n.8 , 20123 - Milan (Italy) VAT number 03187630128 is the Data Controller and the owner of the processing of personal data.

2. Purposes and methods of processing

The personal data provided or otherwise acquired are processed, within the normal activity of ACTION ICT, according to the purposes strictly connected and instrumental to the promotion of IT services at customers, as well as to the correct collection, evaluation and selection of the candidacies presented through the site.

To enter into more detail, the following types of data are processed:

2.1 Navigation data

These data are used only to obtain anonymous statistical information on the use of the site and to check its correct functioning. The data could be used to ascertain responsibility in case of hypothetical computer crimes against the site.

2.2 Data released for requesting information/contacts

These data are used in order to fulfill the request for information or contact expressed by the navigator in specific forms (eg: "Keep in Touch" or "Information Request").

2.3 Data released for the job application

These data, entered by the candidate on the "Careers" page, are used with the aim of evaluating a possible recruitment of IT personnel to cover current or future business needs.

The provision of data for these purposes is not mandatory; however, failure to provide the same, even partially, prevents the provision of the requested services.

The processing of personal data takes place using IT and electronic tools, with logics strictly related to the same purposes, and in any case in order to guarantee the security and confidentiality of the data.

The data will be processed exclusively by the staff of ACTION ICT or of any company appointed as Data Processors; in this case, this will be communicated expressly. Outside of these hypotheses the data will not be communicated to third parties or disseminated, except in cases specifically provided for by national law or EU law.

3. Place of data processing

The data processing takes place at the offices of ACTION ICT and at the respective structures of the Data Processors, selected by the company itself, however placed on the national territory or in European countries also subject to the GDPR regulation.

4. Categories of collected data

4.1 Navigation data

The information systems and software procedures used to operate this website acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols.

This information is not collected to be associated with identified person but by their very nature could, through processing and association with data held by third parties, allow users to be identified.

This category of data includes the IP addresses or domain names of the computers used by users connecting to the site, the URI (Uniform Resource Identifier), the addresses of the requested resources, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numeric code indicating the status of the response given by the server (success, error, etc.) and other parameters relating to the operating system and the user's IT environment.

The ACTION ICT website uses "cookie" technology. For information regarding the Cookies used by the ACTION ICT website, how they are used and how to manage them, consult the "Cookie Policy" document of this website.

4.2 Data released for requesting information/contacts

The personal data collected is limited to the contact details (such as personal data, email address and possibly telephone number), necessary to respond to requests.

4.3 Data released for the job application

The personal data collected is limited to those contained in the CV (personal data, email address, telephone, work experience, technological skills, references, certifications), necessary to evaluate a possible recruitment at the company.

On this site, the processing of particular data (those from which it is possible to deduce the religious or political convictions and information on sexual orientation or on the user's health) is not foreseen.

5. Data recipients

Personal data may be disclosed to the following categories of subjects:

- other companies that collaborate with ACTION ICT, for administrative and site management purposes;
- service providers or individual professionals who carry out, in favor of the Data Controller, specific activities aimed at providing the services related to the purposes stated above.

Finally, the data may be disclosed as persons authorized to process, under the direct authority of the Data Controller or any Person in charge, the natural persons belonging to the following categories who, in relation to the performance of the tasks assigned to them, need to access and process the data:

- employees;
- collaborators and consultants;
- employees of the Data Processor companies.

Third parties that are not designated as Data Processors may be aware of personal data as independent Data Controllers, if this is necessary to carry out processing related to those performed by ACTION ICT and if one of the conditions of lawfulness of processing occurs exempt from acquiring consent (art. 6 GDPR).

6. Data retention time

The personal data processed are kept for the time strictly necessary for the fulfillment of the purposes for which they were collected, in compliance with the prescribed terms or the different terms eventually established by the law for the relative conservation or, for a longer time, in the case in which it is necessary to preserve them for reasons of protection of the rights of the Data Controller. Specific security measures are observed to prevent the loss of data, unlawful or incorrect use and unauthorized access.

7. Rights of Data Subject

In relation to the data processing described in the previous point 2 - "Purposes and methods of data processing", the exercise of the rights envisaged and recognized by the articles 15 and following of the GDPR, in particular the right to:

- access, or to obtain confirmation of the existence or not of personal data concerning you, to know the origin, as well as the logic and purposes on which the processing is based, the recipients or categories of recipients to whom the data they can be communicated and the conservation period determined, if it is possible to define it (art. 15 of the GDPR);
- correction of inaccurate data (art. 16 of the GDPR);
- deletion, in the event that the data are no longer necessary with respect to the purposes of collection and subsequent processing, or in the event of withdrawal of consent to processing (where said consent is provided for as optional or other legal basis for the treatment does not exist) (art. 17 of the GDPR);
- limitation to the treatment: the data subject can request the limitation of the processing not only in the cases of violation but also in the case in which he has requested a variation of his personal data while waiting for the Holder to make the requested changes (art. 18 of the GDPR).
- portability, the right to receive in a structured format, commonly used and readable by automatic device, the personal data of the data subject with the possibility of transmitting them to another data controller. This right does not apply to non-automated processing (for example: archives and paper records); furthermore, only the data processed with the consent of the data subject are subject to portability and only if the data have been provided by the data subject (art. 20 of the GDPR);
- opposition, the right to object to the processing for reasons connected to a particular situation of the data subject, including the right to object to the processing of personal data for the purpose of sending advertising material or newsletters, direct sales or for completion of market research or commercial communication (art. 21 of the GDPR);
- complaint, right to submit a complaint about the use of personal data submitted to this site, to the competent Supervisory Authority.

To exercise the above rights, you can contact the Data Controller at the addresses below:

e-mail to privacy@action-ict.com

or send to ACTION ICT - Via Medici n.8 , 20123 Milan (MI) Italy

Milan, 20/07/2019

ACTION ICT