

**NOTICE PURSUANT TO ART. 13 OF EU REGULATION N. 2016/679**

**- CONTACTS -**

**PROGETTARE ZEROSEI S.r.l.** (Tax code and VAT n.: 02001330352) (hereinafter "P06"), in the person of its legal representative pro tempore, with registered office in Reggio Emilia (RE), via A. Gramsci, 54/V, in its capacity as Data Controller pursuant to art. 4 n. 7) and 24 of EU Regulation n. 2016/679 (GDPR), informs you that, pursuant to art. 13 of the GDPR, your personal data described in art. 1 below will be processed for the purpose of processing described in art. 2 below.

**1. Category of personal data being processed.**

**1.1.** P06 collects and processes, for execution of the processing purpose described in art. 2, your personal data pursuant to art. 4 n. 1) of the GDPR so-called identification data (e.g. name; surname; email address) requested within one or more specific forms on the P06 website [www.dragonfly.school](http://www.dragonfly.school) (hereinafter "Site").

**2. Purposes of processing and legal basis.**

**2.1.** Your personal data is processed by P06 for the following purpose:

- a. Execution of your request for contact and/or further information, made by filling in the appropriate form on the Site.

In compliance with art. 13 paragraph 2) letter e) of the GDPR, P06 informs you that failure to communicate (even partially) your personal data, unequivocally requested as compulsory within the specific form on the Site, may result in the impossibility for P06 to correctly and fully perform the processing purpose as art. 2.1. letter a).

In this respect, P06 specifies that the legal basis of the processing purpose referred in art. 2.1. letter a) is found in art. 6 paragraph 1) letter b) of the GDPR.

**3. Retention period.**

**3.1.** Pursuant to art. 13 paragraph 2) letter a) of the GDPR, P06 informs you of the following retention period, after which your personal data will be subject to erasure, destruction or anonymization: (i) for the purposes of the processing of personal data as art. 2.1. letter a): 5 years, starting from the completion and complete execution of your request for contact and/or further information, a period that may be extended if necessary to comply with legal obligations (including those that have arisen) or to assert or defend a right, including in court.

**4. Target audience.**

**4.1.** In compliance with art. 13 paragraph 1) letter e) of the GDPR, P06 informs you that your personal data may be communicated, if appropriate and necessary, to one or more recipients pursuant to art. 4 n. 9) of the GDPR, generally identified by category as follows: (i) for the performance of the processing purpose referred in art. 2.1. letter a): subjects authorized to the processing by P06; companies controlled by or otherwise connected, even indirectly, to P06; consultants or companies of various nature providing, however, services and/or performances (also professional) connected, even indirectly, to the performance of the purpose in question (e.g. IT companies). Finally, P06 informs you that your personal data shall not be subject to any dissemination.

**5. Transfer.**

**5.1.** P06 informs you that your personal data is stored in automated, partially automated or non-automated files belonging to or otherwise traceable, even indirectly, to P06 and located within the European Economic Area (EEA).

**6. Data subject's rights.**

**5.1.** In relation to the user's personal data, P06 informs that the relevant data subject pursuant to art. 4 n. 1) of the GDPR has the right to exercise the following rights which may be subject to the limitations provided for in art. 2 undecies and 2 duodecies of the Privacy Code: right of access pursuant to art. 15 of the GDPR: right to obtain confirmation as to whether or not personal data concerning the data subject are being processed, as well as the information referred in art. 15 of the GDPR (e.g. purpose of processing, storage period); right to rectification under art. 16 of the GDPR: right to correct, update or supplement personal data; right to erasure under art. 17 of the GDPR: right to obtain erasure or destruction or anonymisation of personal data, where, however, the conditions listed in the same article apply; right to restriction of processing under art. 18 of the GDPR: right to obtain the restriction of the processing of personal data in the cases governed by art. 18 of the GDPR; right to data portability under art. 20 of the GDPR: right to obtain the personal data provided to P06 in a structured, commonly used and machine-readable format (and, where required, to transmit them directly to another Data Controller), where the specific conditions set out in that article are met (e.g. legal basis of consent and/or execution of a contract; personal data provided by the data subject); right to object under art. 21 of the GDPR: right to obtain the cessation, on a permanent basis, of a specific processing of personal data; right to lodge a complaint with the Privacy Guarantor

under art. 77 of the GDPR: right to lodge a complaint where it is considered that the processing under analysis violates national and EU legislation on the protection of personal data.

**6.2.** In addition to the rights described in art. 6.1. above, P06 specifies that, in relation to the personal data of the data subject, there is, where possible and conferring, the right to exercise, on the one hand, the (sub)right provided for art. 19 of the GDPR ("The controller shall communicate to each of the recipients to whom the personal data have been transmitted any rectification or erasure or restriction of processing carried out pursuant to article 16, article 17(1) and article 18, unless this proves impossible or involves a disproportionate effort. The data controller shall inform the data subject of such recipients if the data subject so requests"), to be considered connected and related to the exercise of one or more of the rights regulated in articles 16, 17 and 18 of the GDPR; on the other hand, P06 specifies that, in relation to the personal data of the data subject, there is, where possible and conferring, the right to exercise the right provided for in art. 22(1) of the GDPR ("The data subject shall have the right not to be subject to a decision which is based solely on automated processing, including profiling, and which produces legal effects concerning him or her or significantly affects him or her in a similar way"), subject to the exceptions provided for in paragraph 2 below.)

**6.3.** Pursuant to article 12 paragraph 1) of the GDPR, P06 undertakes to provide the User with the communications referred in art. from 15 to 22 and 34 of the GDPR in a concise, transparent, intelligible, easily accessible and plain language form: such information shall be provided in writing or by other electronic means, or, at the User's request, orally provided that the User's identity is proven by other means.

**6.4.** In accordance with article 12 paragraph 3) of the GDPR, P06 informs you that it undertakes to provide you with information regarding the action taken in respect of a request pursuant to art. from 15 to 22 of the GDPR without undue delay and, in any event, at the latest within one month of receipt of such request; this period may be extended by n. 2 months if necessary, taking into account the complexity and number of requests (in this case, the Controller undertakes to inform the user of such extension and the reasons for the delay, within one month of receipt of the request).

**6.5.** The user may exercise the above-described rights at any time (with the exception of the right under Art. 77 of the GDPR) by using the contact details set out in art. 7.

## **7. Contact details.**

**7.1.** P06 can be contacted at the following address: [info@progettarezerosei.it](mailto:info@progettarezerosei.it)

**7.2.** The Data Protection Officer (DPO) pursuant to Article 37 of the GDPR, appointed by P06, can be contacted at the following address: [privacydpoprogettarezerosei@baldiandpartners.it](mailto:privacydpoprogettarezerosei@baldiandpartners.it)

Reggio Emilia (RE), 19.1.2022 (date of last update)

## **PROGETTARE ZEROSEI S.r.l.**

(in the person of its legal representative pro tempore)