

PRIVACY POLICY INFORMATION

PURSUANT TO THE REGULATION EU/2016/679 ON THE PROTECTION OF NATURAL PERSONS WITH REGARD TO THE PROCESSING OF PERSONAL DATA, ARTICLES 13 AND FOLLOWING (HEREINAFTER “GDPR”)

SDA Express Courier S.p.A. (hereinafter also “SDA S.p.A.” or “SDA”), a single-member limited liability company of the Poste Italiane Group, with registered office in Rome, Viale Europa 175, as Controller of the processing of your personal data, provides you with the following simple and clear information about the said processing.

You are invited to contact us for any request by using the e-mail addresses indicated below.

1. Definitions for the main terms to be found in this policy information

Personal data means any information relating to an identified or identifiable natural person (“data subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

Processing means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

Controller means the legal person which, alone or jointly with others, determines the purposes and means of the processing of personal data;

Joint Controller means the legal person which, jointly with the Controller, determines the purposes and means of the processing of personal data, and that is accountable for the compliance with legal requirements;

Processor means a natural or legal person which processes personal data on the behalf of the controller;

Consent of the data subject means any freely given, specific, informed and unambiguous indication of the data subject’s wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;

Marketing is intended as the performance of commercial, promotional and advertising activities, such as, but not limited to, sending advertising and promotional material, direct sales, market surveys, business communication, or promotional activities carried out during events or prize events sponsored by SDA;

Profiling means any form of automated processing of personal data consisting of the use of that personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person’s performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location or movements.

2. In connection with any single service required, SDA may process Your personal data:

a) Without your express consent for the following Service Purposes:

- In order to execute service agreements of Controller;
- In order to fulfil pre-contractual, contractual and tax obligations deriving from pending agreements between You and the Controller;
- In order to fulfil obligations arising from national laws or regulations, EU laws, or by a National Authority orders (for example to comply with anti-money laundering regulation);
- In order to exercise the Controller rights before courts;

- For payment reminders and debt collection purposes, included the transmission of data to debt collection companies or professionals.

b) Only with Your explicit and clear consent

- for marketing purposes, market surveys and profiling activities enacted by SDA Express Courier S.p.A. or other companies of the SDA Group.

3. Storage modalities of the personal data

Processing of Your personal data will be enacted guaranteeing adequate integrity and confidentiality and to avoid unauthorized use of Your data.

For this reason, Your personal data will be processed and stored following the principles of necessity, data minimization and storage limitation, through technical and organizational measures adequate to the processing risk level and for no longer than the time that will be necessary for the purposes of relevant processing, in any case not exceeding the time period provided by the law.

4. Access to personal data and recipients of the data

Access to Your data may be allowed for the aforementioned purposes to:

- Employees and contractors of Controller to whom the transmission is necessary, functional or instrumental for carrying out the activities requested for the relevant business relationship, under authorization of the Controller, directly or through representatives, persons who may have access to data according to law provisions, as well as to parent, controlled or connected companies, or companies that provide services on the behalf of SDA Express Courier S.p.A. as representatives and/or officers and/or system administrators;
- Third companies or other subjects (such as, but not limited to, debt collection companies, counsels or professionals, marketing and market surveys companies, credit institutions, insurance companies, and so on), to which the Controller outsources activities, as external Processors of the data;
- Third companies which, on whatever ground, provide services for the enactment of the services provided for by the agreements, such as, but not limited to: couriers, software companies, Poste Italiane and companies of the Poste Italiane Group.

SDA Express Courier S.p.A. enacts adequate security programs to ensure information integrity in all its informational systems. Our security programs are periodically upgraded to follow technological evolution.

For the enactment of some activities related to the implementation of the required service as well as in connection to legislative obligations and anyway in compliance with the data protection regulation, SDA may appoint external Processors (third parties who process data on behalf of SDA).

5. Transmission of data

Controller will be entitled to transmit Your data, even in lack of Your explicit consent, for the aforementioned purposes to Supervisory and Judicial Authorities, to insurance companies for insurance services, and to subjects to which the transmission is mandatory. These subjects will process Your data as Controllers.

Your data shall not be made public.

6. Rights of the data subject

As a data subject, You are entitled to exercise the rights provided by Article 15 and following of the GDPR and more specifically:

- To obtain confirmation of the existence of Your personal data and their communication in an intelligible form;
- To obtain indications about: i) the origin of personal data; b) purposes and means of processing; c) logic applied in case of electronic processing; d) identification data of the Controller, the Processors and the representative appointed pursuant to art. 3 of the GDPR; e) the subjects or the categories of subjects to whom your personal data may be transmitted or who may become aware of them as appointed representative in the State territory, as processors or responsible subjects in charge for the treatment;
- To obtain a) update, rectification or, when there is an interest, integration of the data; b) erasure, anonymization or interruption of the treatment of data processed in breach of the law, here included data the storage of which is unnecessary for the purposes for which they were obtained or processed; c) a declaration confirming that operations mentioned in points a) and b), also in relation to their content, have been communicated to the those subjects to whom data are transmitted or disclosed, except in case the fulfilment of this obligation is impossible or implies the use of disproportioned means if compared to the required level of rights protection;
- To object to the process in full or in part: a) for legitimate reasons albeit coherent with the purposes of data collection; b) in connection to advertising or direct sale material, for market surveys or commercial communications, through the use of automated call systems, with no operators involved, through e-mail, through traditional marketing methods, through phone calls and/or paper mail. The right to object, as described in point b), automated direct marketing purposes, includes the right to object traditional marketing purposes and can be exercised also in part. The data subject is entitled to choose to receive only communications by traditional means or only automated communication, or also none of the two options.
- To revoke Your consent to the processing of Your personal data in case You expressed it for one or more specific purposes.

Whenever applicable, You have also other rights provided for by Article 16 to Article 21 of the GDPR (right to correction, erasure, restriction of the processing, data portability, right to object), and the right to lodge a complaint with the supervisory Authority.

7. Modalities for the exercise of Your rights

You can in every moment exercise rights provided for by Article 15 and, whenever applicable, in Articles 16 to Article 21, by sending:

- a registered post mail to the company's registered office in Viale Europa n. 175 – 0144 Roma, or by sending an e-mail to the certified e-mail address sda@pec.sda.it

8. Protection of minors

Minors may be less conscious about risks, consequences, and of their rights connected to the processing of their personal data, for this reason, SDA S.p.A. gives them specific protection, particularly regarding the use of personal data for marketing purposes, profiling, and the collection of personal data in connection with services directly rendered to the minor.

As concern the offer of service of the information society (i.e. any service rendered by electronic means), the processing of personal data requires the explicit consent of the minor and is lawful whenever the minor is in the minimum age required by law for the lawfulness of his or her consent.

9. Controller, Representatives and subjects in charge of the processing

The Controller of the processing is SDA Express Courier S.p.A., with registered office in Rome, Viale Europa n. 175, postal code 00144. The updated list of the Processors is available in its registered office.

10. Data Protection Officer

The Data Protection Officer (DPO) is responsible for the protection of personal data and is appointed by the Controller to fulfil the functions expressly provided by the GDPR.
The DPO is available at the Data Protection Officer's bureau of Poste Italiane, in Rome, Viale Europa n.175, postal code n.0144, and at the e-mail address ufficiorpd@posteitaliane.it