Privacy policy for personal data processing
“Access to the facility”

In compliance with the information obligations set out in the European Regulation on the protection of personal data 2016/679, which aims to safeguard the fundamental rights and freedoms of natural persons — in particular the right to the protection of personal data — you are required to read the following information, which will help you understand the reasons why your personal data will be processed.



1. Who is the Data Controller (who decides which data to process and how)?

The Data Controller, as defined by Article 4, paragraph 1, point 7 of EU Regulation 2016/679 (General Data Protection Regulation, hereinafter referred to as GDPR), is Storti SpA, with registered office at Via Francesco Dioli, 11, 26045 Motta Baluffi (CR), Tax Code and VAT no. 00765230198, hereinafter referred to as the "**Company**".
Pursuant to Article 13 of the GDPR, the following information is provided regarding the processing of personal data.



2. Who are the data subjects (the recipients of this privacy notice)?

The data subject is the natural person to whom the personal data processed by the Company refers. For the purposes of this privacy notice, the data subject is any individual who accesses the Company’s premises as an external party, hereinafter referred to as the “External Visitor”.



3. What data is collected, for what purposes, and on what legal grounds (why is the data collected)?

The personal data of the External Visitor (identification data) is collected and processed in order to ensure secure access procedures for third parties entering the Company’s premises.

For full transparency, please note that the Company uses the XAtlas platform to manage access. Information about the platform's data usage and GDPR compliance can be found here.

The legal basis for processing is the protection of the vital interests of the External Visitor (Art. 6.1 letter d), as well as compliance with a legal obligation (Art. 6.1 letter c) of the GDPR.



4. Is the provision of data mandatory or optional?

The provision of data is optional; however, any refusal to provide such data, in whole or in part, will result in the External Visitor being denied access to the facility, thereby preventing the Company from fulfilling the contract.



5. Where are the data processed, how, and for how long?

The collected data are processed at the Company's premises.

The data will be processed using electronic or otherwise automated, IT, and telematic tools, or through manual processing, with logic strictly related to the purposes for which the personal data were collected, and in any case in such a way as to ensure the security of the data.

The data will be retained only for the time strictly necessary to manage the purposes for which they are processed ("storage limitation principle", Art. 5 of EU Regulation 2016/679), and in any case no longer than 3 months from the time of collection.

In any case, the Company applies policies that prevent the indefinite retention of data and therefore limits the storage period in accordance with the data minimization principle.

Data may be retained for a longer period only in compliance with specific legal obligations.



6. Who is authorized to process the data and to whom may the data be disclosed?

The processing of the collected data is carried out by internal personnel of the Company, specifically identified and authorized to process the data, following specific instructions and in compliance with current regulations.

The data collected, within the scope of the purposes indicated and where necessary or instrumental to achieving those purposes, may be processed by third parties appointed as external Data Processors, or, depending on the case, disclosed to all parties necessary for the proper fulfillment of the purposes outlined in point 3.

The data may also be disclosed to judicial authorities upon legitimate request and only in the cases provided for by law.

Under no circumstances and for no reason will your data be subject to dissemination.



7. Can the processed data be transferred to non-EU countries?

Data may be transferred abroad to non-European countries, particularly to the United States, only after verifying the application of Standard Contractual Clauses adopted/approved by the European Commission pursuant to Article 46, paragraph 2, letters (c) and (d) of the GDPR, or Binding Corporate Rules pursuant to Article 47 of the GDPR, or, in the absence of these, under one of the derogations provided for in Article 49 of the GDPR.

The transfer to the United States is authorized under the specific agreement known as the EU-US Data Privacy Framework (available [here]), which does not require additional consent.



8. What are your rights?

With regard to the personal data provided, the External Visitor has the right to exercise the following rights:

a. (Art. 7.3 of EU Regulation 679/2016 – GDPR) Withdrawal of consent;
b. (Art. 15 of the GDPR) Access the data and request a copy;
c. (Art. 16 of the GDPR) Request rectification;
d. (Art. 17 of the GDPR) Request erasure (“right to be forgotten”);
e. (Art. 18 of the GDPR) Request restriction of processing;
f. (Art. 20 of the GDPR) Receive the data in a structured, commonly used and machine-readable format for the purpose of exercising the right to data portability;
g. (Art. 21 of the GDPR) Object to the processing.

The External Visitor may exercise these rights, or request further information regarding their personal data, by sending an email to privacy@storti.it, specifying the nature of the request in the subject line.

Requests concerning the exercise of the External Visitor’s rights will be handled without undue delay and, in any case, within one month from the date of the request. In cases of particular complexity or if multiple requests are received, this period may be extended by an additional two (2) months.

Please also note that you have the right (pursuant to Art. 77 of the GDPR) to lodge a complaint with the Data Protection Authority, whose contact details are available here.

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