

## **Privacy Policy**

Information notice pursuant to Regulation (EU) 679/2016 on the protection of physical persons in relation to the processing of personal data, the GDPR and any subsequent amendments. This website complies with and safeguards the privacy of visitors and users alike by making any possible and reasonable effort to prevent adversely affecting users' rights.

Dear User,

in compliance with provisions set out under Article 13 of Regulation (EU) 2016/679 (hereinafter "the Regulation"), this information notice is addressed at persons, who, having accessed the <http://www.alphatrading.it> address, wish to interact with web services provided by Alpha Trading S.p.A., for the purposes of supplying information concerning the company's privacy policy; understanding personal data management procedures in place when using Alphatrading websites and, if applicable, granting explicit and informed consent to the processing of users' personal data.

Any information and data provided by website users (hereinafter "the Data Subject"), or otherwise acquired through using the <http://www.alphatrading.it> website (e.g. gaining access to private areas of the website or receiving the newsletter) shall be processed according to provisions set out under the Regulation and other privacy and confidentiality obligations informing and inspiring Alpha Trading S.p.A. business principles.

As a consequence of browsing this website, personal data belonging to data subjects (whether identified or identifiable) may be processed, therefore, this information notice aims to describe site management policies with reference to the processing of website users' personal data.

This information notice is rendered for the Alpha Trading website and for any other company website possibly reached by users via said link (e.g. <http://www.alphatrading.it>, etc.).

With regards to business communication channels conveyed via social networks (e.g. Facebook, Instagram and Twitter), data subjects should refer to information notices issued by relevant personal data controllers for each communication platform and data base, and to this information notice solely with regards to personal data made available to Alpha Trading through said channels.

### **Type of Personal Data**

#### **Web-browsing data**

IT systems and software procedures for the running of this website normally acquire specific items of personal data the transfer of which is inherent in the use of Internet communication protocols.

Said personal data are not gathered for the purposes of associating same with identified data subjects, but may, due to the nature thereof and following processing and association with data held by third parties, allow for the identification of users/data subjects.

This category of data includes such data as IP addresses or dominions of computers used by users to connect to the website, Uniform Resource Identifier (URI) addresses of required resources, request time and server submission mode, resulting reply file size, server-generated reply status code number (successful, error, etc.) along with other parameters relating to the user/data subject's operating system and IT environment.

The abovementioned data shall be used solely for the purposes of gathering anonymous statistical information concerning website use and ensuring the efficient functioning thereof. Said data shall be erased immediately after processing. Said data may be used when ascertaining responsibilities in case of

alleged IT crimes against the website: without prejudice to the above, personal data concerning web contacts shall only be saved for as long as necessary to gather statistical data.

### **Personal data provided freely by users/data subjects**

The optional, explicit and voluntary forwarding of an email to any of the addresses provided by this website implies that the senders' address shall be thereafter acquired, as same is essential with regards to responding to requests forwarded. This applies to any other personal data included on the same email.

We therefore ask that email senders grant their explicit consent to personal data processing directly onto the email itself. Should this not be the case, Alpha Trading shall not be able to respond to any requests therein.

In any case, should any third party personal data be supplied or processed while using this website, it shall be guaranteed from the onset that any responsibility thereto connected shall be undertaken to ensure that the processing aforementioned is lawful under Article 6 of the Regulation legitimising the processing of said information.

Summary information notices shall gradually be released and uploaded to the relevant pages of this website which are specifically meant for the meeting of on-demand services or the submitting of employment applications.

### **Personal Data Processor**

Dr Adriano Parodi is the appointed Personal Data Processor.

### **Location and purpose of Personal Data Processing**

Any processing connected to web services for this website shall occur on abovementioned company premises in Genoa, at no. 3/19 of Via Brigata Liguria and shall be performed by duly appointed members of staff. No data obtained by way of the web service shall be disseminated. Any personal data supplied by users/data subjects wishing to receive information of any nature (receiving newsletters, requesting information, processing claims, forwarding CVs, etc.) shall be processed solely for the purposes of meeting said requests; complying with obligations pursuant to law; accounting and taxation, and shall only be disclosed to third parties when strictly necessary or upon consent from data subjects.

### **Lawfulness and compulsory or optional nature of personal data processing**

The lawfulness of personal data processing for purposes reported in the section above is set out under Article 6 (1 b - f) of the Regulation in so far as processing is required to perform Services and address requests received from data subjects.

Except for provisions relating to internet browsing data, data subjects may supply personal data reported on request forms or, in any case, required for the forwarding of information, applications for employment positions or other communications.

Failure to grant consent to personal data processing shall impede the reception of the requested information.

## **Recipients of Personal Data**

For the purposes mentioned above, data subjects' personal data may be shared with:

- subjects typically acting as personal data processors, i.e.: i) natural persons, companies or professional practises assisting or consulting for Alpha Trading on such subject matters as accounting, administration, law, taxation, finance and debt recovery conducive to supplying said Services; ii) subjects with whom interaction is required for the performance of Services (e.g. host providers); iii) other duly appointed subjects performing technical maintenance (including the maintenance of network devices and electronic communications networks);
- subjects, agencies or public authorities to whom the disclosure of personal data is mandatory or otherwise provided for by enforced authority;
- natural persons appointed by Alpha Trading to the performance of personal data processing required for activities that are strictly related to the provision of Services, and who have duly undertaken to comply with confidentiality requirements or are otherwise bound by appropriate legal obligations of confidentiality (e.g. employees).

## **Personal data processing, transfer and storage**

Personal data may be processed using automated and non-automated means and shall thereafter be held for as long as strictly necessary for the purposes for which said personal data were gathered and/or stored for as long as established by specific obligations or applicable law, and, in any case, for the time allowed by enforced Italian law and legislation safeguarding own interests (Articles 2946 and following of the Italian Code of Civil Law).

Specific safety measures have been implemented in order to prevent any loss, illicit or inappropriate use of and unauthorised accesses to data.

Specific types of personal data may be transferred to recipients outside of the European Economic Area. Alpha Trading S.p.A. ensures users/data subjects that, should the above occur, any personal data processing shall occur pursuant to provisions set out under the Regulation. Indeed, decision-making practices are informed by principles of appropriacy, Standard Contractual Clauses approved by the European Commission or other eligible legal grounding.

## **Rights of the Data Subject**

Pursuant to Article 15 and following of the Regulation, data subjects have the right, at any time, to obtain from Alphatrading S.p.A. access to their personal data, to request the rectification or erasure of same, or to object to or restrict processing thereof pursuant to Article 18 of the Regulation, including, if feasible and pursuant to Article 20 of the Regulation, the right to obtain personal data in a structured, commonly used, machine-readable and interoperable format.

In any case, should personal data processing be deemed contrary to currently enforced law and legislation, data subjects hold the right, at any time, to lodge a complaint with the competent supervisory authority (i.e. the Italian Data Protection Authority), as reported under Article 77 of the Regulation.

Any written applications should be addressed to [sistemiinformativi@alphatrading.it](mailto:sistemiinformativi@alphatrading.it)

Up-dated this May 25, 2018