

	INFORMATION pursuant to Article 13 of the General Data Protection Regulation (EU) 2016/679 WEBSITE USERS	Privacy Organizational Model
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Dear user,

To provide you with the services of the website <https://www.alphatrading.it> (hereinafter also "our website"), we need to process some of your personal data. We therefore invite you to carefully read this document, which contains all the information you need to understand the purpose and methods of data processing.

This information:

- It is valid only for our website. If you visit other websites through links on our website, we invite you to read the relevant information provided there;
- It may be subject to updates over time. We therefore invite you to consult the current document by consulting the Privacy section of our website.

For information regarding the use of cookies, the specific information is always available in the Cookie Policy section of our website.

THE DATA CONTROLLER

The data controller is Alpha Trading SpA, with registered office in Milan, Piazza della Repubblica 26, 20124, VAT number 11879090154, email: info@alphatrading.it, certified email : alphatrading@pec.alphatrading.it (hereinafter Alpha Trading), which you can contact via the address indicated or via the email address privacy@alphatrading.it.

CATEGORIES OF PERSONAL DATA

Depending on the services requested, we may process different categories of personal data; in particular, we will process :

- to respond to your requests made through our "Contacts" page: name, surname, email address and telephone number;
- to receive your application through our "Work with us" page: name, surname, email address, telephone number and CV;
- for consulting our site: navigation data such as, for example, IP addresses or domain names of computers used by users who connect to our site, the URI (Uniform Resource Identifier) addresses of 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, etc.

ORIGIN OF YOUR PERSONAL DATA

The data processed are those you provide when you contact us through the various features of our site to request information and to submit a job application.

We also inform you that if you use plugins (for example, to log in, share, or post, etc.) on other websites or social media, your browsing data on our website may be collected by the website or social media operator. You can refer to the privacy policies of the various websites or social media to learn how their platforms, as data controllers, collect and use this information.

PURPOSE AND LEGAL BASIS OF THE PROCESSING

Alpha Trading processes your personal data as defined and indicated above for the purposes illustrated below and according to the lawfulness bases referred to in the GDPR and specified alongside:

- for the performance of a contract to which the data subject is party or for the implementation of pre-contractual measures adopted at the request of the data subject** (GDPR, art. 6, paragraph 1, letter b) to respond to requests for information, to respond to your application, to navigate our website;

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b. **to pursue the legitimate interest of the data controller** (GDPR, art. 6, paragraph 1, letter f); by way of example, but not limited to:

- protection of the company's rights in and out of court;
- the security and protection of the Data Controller's information systems.

MANDATORY PROVISION OF PERSONAL DATA

Some personal data, duly indicated, requested when activating one of our services is mandatory; failure to provide this personal data, or the partial or inaccurate provision of this data, will prevent us from completing the contractual or pre-contractual relationship because it will jeopardize its proper execution.

Failure to provide personal data not marked as mandatory, however, does not affect the completion of the activity you are requesting.

PLACE OF PROCESSING OF PERSONAL DATA

Your personal data is processed within the European Union.

All operations—collection, processing, consultation, printing, archiving, modification, updating, etc.—may be carried out on paper or using electronic tools.

In the event that the IT service providers used by Alpha Trading are companies established in non-EU countries, personal data will be transferred to these providers only if one of the guarantees set forth in Chapter V (Transfers of Personal Data to Third Countries or International Organizations) of the GDPR is met.

COMMUNICATION OF YOUR PERSONAL DATA TO THIRD PARTIES

Your personal data may be communicated by Alpha Trading for the purposes mentioned above to:

- companies to which we have entrusted the support for Information Technologies;
- natural or legal persons that Alpha Trading uses to manage the site.

These entities will be provided with only the minimum personal data necessary to perform their assigned service. These entities, where applicable, will be appointed as data processors pursuant to Art. 28 of the GDPR. The list of Data Processors is available upon request.

Personal data is processed by data processors under the authority of Alpha Trading, all trained in the relevant privacy legislation. Personal data is not disclosed.

PERIOD OF RETENTION OF PERSONAL DATA

The personal data collected for purpose a) will be stored:

- for the time necessary to respond to your request;
- CVs are retained by the Company for 24 months after receipt. If you are hired, your personal data will be retained along with your personal file;
- for the 6 months following acquisition, for browsing data.

In the event of protection of the data subject's rights and for the purposes referred to in point b), personal data will be processed for the time necessary for the statute of limitations to expire.

At the end of the indicated periods, your personal data will be deleted from all electronic and paper archives, without prejudice to the maximum 30-day period for carrying out the deletion.

YOUR RIGHTS

You have the right to request and receive, at any time, information regarding your personal data processed by Alpha Trading or to request its rectification. Where applicable, you have the right to request erasure, to limit its processing, and to receive your personal data in a structured, commonly used, and machine-readable format. You also have the right to object to the processing of your personal data, pursuant to Article 21 of the GDPR, or to lodge a complaint with the competent Data Protection Authority pursuant to Article 77 of the GDPR.

You can address any requests regarding your rights directly to Alpha Trading at the contact details above.

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AUTOMATED DECISION-MAKING

Alpha Trading does not perform, nor does it intend to perform, automated decision-making, including profiling, on your personal data.

DOCUMENT UPDATE

Alpha Trading reserves the right to update this document. The updated version of this policy is always available in the privacy section of the company's website. We encourage you to always review the updated version.