Privacy Notice pursuant to EU Regulation No. 2016/679 regarding the protection of natural persons with regard to the processing of personal data

European Regulation No. 679 of 27 April 2016 and the subsequent implementing and coordinating provisions provide for the protection of natural persons (so-called "data subjects") with regard to the processing of personal data concerning them.

Superba Consulting S.r.l. protects the personal data of natural persons who are users of the website Superba.Consulting© https://www.superba.consulting in accordance with EU Regulation 679/2016 and the related implementing and coordinating provisions.

Pursuant to Art. 13 of the aforementioned Regulation, we hereby provide the following information.

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1. Who is the Data Controller of the personal data provided?

The Data Controller is Superba Consulting S.r.l., with registered office in Piazza Colombo 2A/17, 16121 Genova (GE), Italy, VAT No. 02815060997 and Tax Code IT02815060997.
Email: g.riccardi@superbaconsulting.it
Website: https://www.superbaconsulting.it/index.php.

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2. What personal data do we collect and process?

"Personal data" means any data that allows the direct or indirect identification of an individual.

We process personal data:

A. Provided directly by data subjects for the execution of a contract or for the use of related services;
B. Collected automatically (for example: cookies collected through our website).

The main categories of personal data we process are: identification data, contact data, and any photographs portraying the data subject.

We do not collect data relating to users' geolocation.

Our website and related software collect certain personal data whose transmission is implicit in the use of Internet communication protocols (for example: IP addresses or domain names of the computers used by users connecting to our site, the URI 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, the numerical code indicating the status of the server response and other parameters relating to the operating system and the user's IT environment). Such data are used solely to obtain anonymous statistical information on website usage and to check its correct functioning; they are deleted immediately after processing. The data may be used to ascertain liability in the event of hypothetical cybercrimes against our website; except for this possibility, they are deleted after no more than seven days.

For further information on how the Controller processes cookie-related data, please refer to the Cookie Policy available at:
https://admin.superba.consulting/zmedia/public/informativa_cookie.pdf.

3. For what purposes do we process the user's personal data?

In general, we process personal data:

A. For contractual purposes, and therefore for carrying out our commercial activities and the sale of our products and services, for entering into and performing contracts, and for administrative, accounting and tax activities carried out in the context of our commercial activity;
B. For the management and improvement of our website functionalities;
C. On the basis of the user's consent, to send newsletters and commercial information regarding our products and services.

4. What would happen if the user did not authorize the processing of their personal data?

If the user does not give consent to the processing of personal data for the purpose referred to in letter A), we would not be able to enter into a contract or perform the requested service or comply with related legal obligations, nor provide a service in accordance with our quality standards, nor respond to your requests.

Failure to consent to cookie collection may exclude certain functionalities of our website and make browsing and use less complete and efficient.

Failure to authorize the processing of personal data for marketing and commercial information purposes has no consequences on the provision of services or purchased products but will prevent the user from receiving updates on the initiatives of Superba Consulting S.r.l.

5. On what legal basis do we process the user's personal data?

As a general and prevailing rule, we process personal data on the basis of the contract with the data subject, including the management of pre-contractual activities; data may also be processed for the fulfillment of legal obligations incumbent upon the Controller in connection with the commercial activity described above (for example: tax obligations).

The sending of newsletters or commercial information, or the publication of any photographs portraying the user on the web or on social networks, is based on prior consent.

6. Where do we process the user's personal data?

Processing related to the web services of Superba Consulting S.r.l. is carried out at the premises of Superba Consulting S.r.l. and is handled only by technical personnel expressly authorized for this purpose. Hosting services for our website are provided by AWS (Amazon Web Services) on servers located within the Europe/Ireland region (eu-west-1), which guarantees compliance with the applicable data protection regulations within its scope of responsibility.

7. How do we process the user's personal data?

In relation to the above purposes, we process personal data using IT tools such as local servers, personal computers, management software, and online databases.

We process and organize user data through automated procedures and operational, analytical or collaborative management applications or CRM systems in order to manage contract execution in the best possible way and improve website functionality.

To protect processed data, we adopt organizational measures such as restricted access and technical measures such as disaster recovery systems (e.g., backup) and protection against unauthorized access (e.g., firewall).

Personal data collected and any reviews made by users via social networks or other applications may be published on social networks for promotional purposes related to the Controller's activities.

Data processed for the purpose of sending newsletters and commercial information may also be processed using automated electronic communication tools.

Any photographs uploaded to our website containing the user's image are made available, subject to consent, to other users of the site and published on our social networks and therefore processed through such platforms (e.g., Facebook, Twitter, Instagram, etc.).

We do not transfer user data to third countries, territories, international organizations or entities outside the European Union, except when publishing, with consent, photographs portraying the user on social networks whose databases may also be located outside the European Union. In such cases, we verify that appropriate safeguards are in place pursuant to Articles 25, 32 and 46 of EU Regulation 679/2016.

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8. How long do we retain the personal data we process?

A. Personal data processed for contract execution: We retain personal data collected for the execution of a contract or related pre-contractual activities, or more generally within the context of customer relationships, until the extinction of all rights exercised or potentially exercisable by the parties. We delete them one year after the user has used our product or service or, in the event of disputes, until resolution.

B. Personal data processed for newsletters and commercial information: We retain such data until consent is withdrawn or, in any case, for a maximum period of 2 (two) years from the expression or renewal of consent. To unsubscribe, simply select the cancellation link at the end of each email or send a request to g.riccardi@superbaconsulting.it. Cancellation is handled automatically within 72 hours.

C. Photographs uploaded by the data subject: Any photographs uploaded will remain available for one year from upload and will then be deleted.

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9. To whom do we disclose the personal data we process?

The data we process are not subject to public dissemination.

Within our activity, we may communicate data to collaborators and employees authorized to process data within the scope of their duties, and to natural or legal persons where communication is necessary to comply with legal or contractual obligations.

Main categories of recipients are:

A. Accountants, tax consultants and labor consultants for accounting and tax obligations;
B. Other consultants (IT, legal, security, certification bodies, etc.) or professionals assisting the Controller;
C. System administrators;
D. Hosting providers and backup system providers;
E. Third parties subcontracted for part of the contractual activities or technological services related to website management;
F. Entities processing financial transactions for purchases made on our website.

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10. What are the user's rights regarding the personal data we process?

As a data subject, the user has the right:

A. To Access personal data, including purposes, legal basis, categories of data processed, recipients, retention period, source of data, and existence of automated decision-making processes;
B. To Erasure of personal data under the conditions provided by law;
C. To Rectification and data portability (including direct transmission to another Controller) by sending an email to g.riccardi@superbaconsulting.it. A response will be provided within 30 days;
D. To Withdraw consent at any time;
E. To Restrict processing under the conditions set out in Art. 18 of EU Regulation 679/2016;
F. To Object to processing for direct marketing purposes by emailing g.riccardi@superbaconsulting.it;
G. Not to be subject to decisions based solely on automated processing, including profiling, producing legal effects concerning them, except in the cases provided for in Art. 22(2) of EU Regulation 679/2016;
H. To lodge a complaint with the competent Supervisory Authority.