

Privacy Policy

INFORMATION NOTICE ON CLIENT PERSONAL DATA PROCESSING

Updated on 15 November 2023

Ins & Outs English Services, with place of business in Trieste, via Francesco Trevisani 6 (hereinafter “**Data Controller**”), as data controller, informs you, in compliance with art. 13 EU Regulation No. 2016/679 (hereinafter “**GDPR**”), that your data will be processed with the following methods and for the following purposes.

1. Processing Subject

The Data Controller processes the personal data—personally identifiable information and not special categories of personal data (including but not limited to name, surname, trading name, address, telephone, email; hereinafter, “**personal data**” or “**data**”)—provided by you to the Data Controller upon filling out of contact or newsletter forms, submission of contact request to request service supply by the Data Controller and contract undersigning.

The Data Controller, using computer systems and software procedures for the functioning of this website, acquires, during normal operation, some personal data (including but not limited to IP addresses, computer domain name, server request method, user operating and computer system parameters), the transmission of which is implied in the use of Internet communication protocols.

2. Purposes of Processing

Your personal data are processed as follows:

A) Without your explicit consent (art. 6 (b), (c) and (e) GDPR), for the following Service Purposes:

- Managing and maintaining the Website;
- Allowing you to use the services you may explicitly request;
- Processing a contact request;
- Fulfilling obligations required by law, legislation, EU regulations or an order by the Authority;
- Preventing or identifying fraudulent activities or damaging abuses against the Website;
- Exercising the rights of the Data Controller, for example, the right to exercise a right in a court of law.

B) Only with your specific and explicit consent (art. 7 GDPR), for the following Other Purposes:

- Sending you via email newsletters, marketing communications, and/or marketing and promotional material;
- Downloading educational and information material;
- Providing support services;
- Managing marketing profiling activities.

3. Processing Methods

The processing of your personal data is performed through the following operations: collection, recording, organization, storage, consultation, adaptation, alteration, selection, retrieval, comparison, use, interconnection, blocking, transmission, erasure and destruction of the data. Your personal data are subjected to both paper, and electronic and/or automated processing. The Data Controller will process the personal data for the time necessary for fulfilling the above purposes and at any rate for no longer than 10 years from the termination of the relationship for Editing Service Purposes and 5 years from data collection for the Other Purposes.

4. Data Protection

The Data Controller has employed a variety of safety measures to protect your data from loss, abuse and forgery risk in compliance with art. 32 of the GDPR, considering the state of the art and realization costs, as well as processing nature, subject, context and purposes.

5. Data Access

Your data may be made available for the purposes in compliance with art. 2 (A) and 2 (B) to the following:

- Third-party companies or individuals (including website providers, cloud providers, IT providers, technicians providing software and hardware support, lending institutions, professional firms, etc.) that perform outsourcing activities for the Data Controller, as data processors.

6. Data Transmission

Without your explicit consent (art. 6 (b), (c) and (e) GDPR), the Data Controller can share your data for the purposes indicated in art. 2 (A) to Supervisory Authorities and Legal Authorities, as well as all other parties with whom data sharing is required by law for the indicated purposes. Data will not be disseminated.

7. Data Transfer

The processing and storage of the personal data will take place in Europe at the Data Controller's places of business on the Data Controller's servers based in Europe.

8. Nature of Data Supply and Consequences of Not Giving Consent to Data Supply

Providing data for the purposes indicated in art. 2 (A) is compulsory. Without such data, we will not be able to supply the services as indicated in art. 2 (A).

On the other hand, providing data for the purposes indicated in art. 2 (B) is not compulsory. Thus, you may decide not to provide any data or to subsequently oppose to the processing of data you have already provided; in this case, you will not be able to receive emails. You will still be entitled to the services as indicated in art. 2 (A).

9. Rights of the Data Subject

In compliance with artt. 13 et seq. GDPR, which are explicitly referenced, the data subject is entitled to the following rights:

- Right to ask the Data Controller for access to personal data and their correction or erasure, right to restriction of the processing of personal data that concern the data subject and right of opposition to their processing, as well as right to data portability;
- If consent for one or more specific purposes has been given, right to withdraw consent at any time without jeopardizing the legitimacy of data processing based on the consent given prior to withdrawal;
- The right to lodge a complaint with a Supervisory Authority.

10. Method for Enforcing Your Rights

At any time, you may enforce your rights as follows:

- By sending a letter by registered mail to **Ins & Outs English Services**—legal representative Mrs. Alexa Spanghero; place of business via Francesco Trevisani 6, 34139, Trieste, Italia
- By sending an email to the email address insandouts.enservices@gmail.com.

11. Minors

This Website and the services provided by the Data Controller are not for meant for persons under 18 years of age, and the Data Controller does not intentionally collect personal information related to minors. In the case

where information related to minors is involuntarily recorded, the Data Controller will promptly erase it, upon users' request.

12. Data Controller, Person in Charge and Appointees

The Data Controller and Person in Charge of data processing is **Ins & Outs English Services—legal representative Mrs. Alexa Spanghero; place of business: via Francesco Trevisani 6, 34139, Trieste, Italia.**

Email: insandouts.enservices@gmail.com

13. Amendments to the Present Notice

The present Notice may undergo amendments. It is thus recommended to regularly check this Notice and refer to its latest updated version.