

# ***Sistema di Gestione per la Privacy (SGP)***

## **Data Protection Policy**



eGlue S.r.l

*Sede Legale e Operativa*  
Via degli Alpini, 34  
20090 Segrate (MI) | Italia

*Sede Direzionale e  
Amministrativa*  
Via Cassanese, 224  
Pal. Raffaello B  
20090 Segrate (MI) | Italia

Tel +39 02.36.68.44.1  
Fax +39 02.26.51.00.34  
info@eglue.it  
www.eglue.it

Cod.Fisc. e P.IVA 07334940157  
Cap. Soc. Euro 400.000,00= i.v.  
Ufficio del Registro  
di Milano (MI)  
n. R.E.A. 1156916

## Versioni

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## Approvazione

Nome	Data	Note
Davide Aprea	21/05/2018	Approved and published

## Riferimenti

	Riferimento	Pubblicato	Stato
I.	Politica di gestione per la Sicurezza delle Informazioni (SGP)	Marzo 2018	Final
II.	Sistema di Gestione Integrato (SGI)	Ottobre 2017	Final
III.	Information Security Policy (SGSI)	Ottobre 2017	Final

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## 1 Introduction

eGlue is committed to protecting the privacy of its customers and users and declares itself responsible for data security. We will be clear and transparent about the information we collect and what we will do with this information.

This disclosure establishes the following:

- What personal data is collected and processed;
- In relation to which relationship with the customer;
- Where we get the data;
- What we do with such data;
- How we store data;
- To whom we transfer / disclose such data;
- How we treat your data protection rights;
- And how we comply with data protection regulations.

All personal data are collected and processed in compliance with the European Regulation for the Protection of Personal Data, also referred to as GDPR (EU Regulation 679/2016).

## 2 Data controller

"eGlue" in this statement refers mainly to eGlue srl. eGlue by default is the "data controller" of all personal information collected through web sites, portals and any other information systems delivered to our customers. In case of personal data agreement between eGlue and customer, eGlue acts and processes personal data as responsible for personal data protection on behalf of the customer.

## 3 Processed data

Personal data means all information relating to the user that allows us to identify him, such as the name, contact details, booking reference number, payment details and information on his access to our website.

We may collect user personal data when accessing our websites, either public, operative or dedicated to monitoring of electronic and paper production.

Specifically, we could collect the following categories of information:

- 1) Name and Surname, Company, e-mail address, telephone number;
- 2) Information on the use of our website and / or app;
- 3) Communications exchanged with us or addressed to us via letters, e-mail, chat service, telephone calls and social media.
- 4) Possibly, the IP address from which connections are accepted by the Customer.

Personal details about the user's physical or mental health, crimes or criminal convictions are considered "sensitive" personal data and completely out of our scope and there is no intention to deal with these kind of data.

## 4 How we process personal data

Personal data may be used for the following purposes:

- 1) Provide the requested products and services: we use the information provided by the user to perform the services requested in relation to the agreements made with the Customer;
- 2) Contact the Customer in case of modification of the work or problem not foreseen on its operation;
- 3) Communications with customer service: we use the user's data to manage ours to improve our services and improve the user experience with us;
- 4) Provide tailor-made services: we use user data to provide information that we believe to be of interest before, during and after the service provided by eGlue;

We will only process your personal data if we have a legal basis to do so. The legal basis will depend on the reasons for which we have collected and we must use your personal data.



We will not store data for longer than is necessary to fulfill the purpose for which it was processed. To determine the appropriate retention period, we take into consideration the quantity, nature and sensitivity of personal data, the purposes for which we process them and whether we can achieve these goals by other means.

We must also take into account the periods for which we may need to retain personal data in order to comply with our legal obligations or to examine claims, requests and defend our legal rights in the event of a claim for compensation.

When we no longer need your personal information, we will delete it or destroy it securely. We will also assess if and how we can reduce the personal data we use over time and if we can anonymously make your personal data anonymous so that they can no longer be associated with the user or identify it, in which case we may use that information without notice.

## 5 Security of personal data

We follow strict security procedures in the storage and disclosure of personal data, to protect them against accidental loss, destruction or damage. The data that the users provide us are protected with SSL (Secure Socket Layer) technology. SSL is the standard method of encrypting personal data and credit card numbers allowing them to be securely transferred over the Internet.

We may disclose your information to trusted third parties for the purposes set out in this Privacy Statement. We require all third parties to take appropriate technical and operational security measures to protect personal data, which are in line with the GDPR regarding data protection rules.

## 6 Transfer of personal data to third countries

eGlue does not transfer any data outside the EU.

In the event that this need arises, we will ensure that a formal and written approval is obtained from all customers involved.

## 7 Sharing personal data

The personal data of our Customers / Users are shared only with suppliers formally approved by eGlue itself and by the Customer. All suppliers are required to adhere to specific personal data security policy.

We may also share your personal information with the following third parties for the purposes described in this Privacy Policy:

- 1) Government authorities, law enforcement agencies, regulators and airports included in the itinerary or that the user's flight could fly in compliance with legal requirements;
- 2) Trusted service providers we use to manage our business, such as support operators, call centers that provide assistance to our customers, cloud service providers;
- 3) Legal advisors and other professionals, courts and law enforcement agencies in all countries in which we operate in order to protect our legal rights in relation to our contract with the user;

## 8 Cookies

eGlue web sites may use cookies to improve our service and offer you some useful features. This may include cookies stored on your computer or device when you visit our website or app.

Cookies are small text files that are transferred to your computer's hard drive via the web browser to allow us to recognize the user's browser and help us to monitor visitors to our site, allowing us to better understand the products and services that will be more suitable for users. A cookie contains contact information and useful information to help identify the computer when you visit our site in order to help the user to use the portal.

Most web browsers automatically accept cookies, but, if desired, you can change these browser settings by accepting, rejecting and deleting cookies. The "help" menu of the toolbar on most browsers explains how to prevent the browser from accepting new cookies, how to make the browser notify you when you receive a new cookie or completely disable cookies. If you choose to change these settings, certain features and functionality may not work as expected. The cookies used do not detect the information contained on the computer.



For more information about cookies and how to prevent the browser from accepting them, visit the following website: <http://www.allaboutcookies.org>.

We use specific software to monitor the traffic and use of the site, in order to improve the development of design and layout of websites. This software does not allow us to collect personal data of users who browse our sites except those expressly granted for the registration of the account.

## 9 Data protection officer

We have appointed a Data Protection Officer (DPO) to verify compliance with this statement. The user has the right to make a complaint at any time to the supervisory authority for the protection of personal data.

The Data Protection Officer references are:

Davide Aprea  
eGlue srl, via degli Alpini 34, Segrate (MI)  
tel. +39.02. 36684427  
dpo@eglue.it or privacy@eglue.it

## 10 Rights of data subjects

Under certain circumstances, by law you have the right to:

- Request us if we have personal information about you and, if so, what such information is and why we process it / use it.
- Request access to your personal information (commonly known as "data access request"). This allows you to receive a copy of the personal information of the user in our possession and to check its correct processing.
- Request the correction of the personal information of the user in our possession. This allows the user to correct any incomplete or inaccurate information.
- Request cancellation of your personal information. This allows us to ask ourselves to delete or remove personal information where there are no valid reasons for continuing to process it. You also have the right to ask us to delete or remove your personal information if you have exercised your right to object to the treatment (see below).
- Oppose to the processing of personal data in which a legitimate interest (or of a third party) is invoked and there are elements relating to a specific personal situation that lead to object to the treatment. You also have the right to object to processing where your personal information is used for direct marketing purposes.
- Request the limitation of the processing of personal information. This allows us to ask ourselves to suspend the processing of personal data, for example if we want to verify the accuracy or the reasons.
- Request the transfer of personal information in electronic form and structured to the user or to another party (commonly known as the right to "data portability"). This allows you to take your data in our possession in an electronically usable format and transfer them to another part in an electronically usable format.
- Withdrawal of consent. In the limited circumstances in which you may have consented to the collection, processing and transfer of your personal information for a specific purpose, you have the right to revoke it for such specific treatment at any time. Upon receipt of the consent revocation notification, we will no longer process the user information for the originally agreed purpose or purpose other than on the basis of another legitimate basis.

If you wish to exercise any of these rights, please send an email to [DPO@eglue.it](mailto:DPO@eglue.it).

You will not have to pay any costs to access your personal information (or to exercise one of the other rights). However, if the request for access is clearly unfounded or excessive we may charge the applicant a reasonable cost. Alternatively, we may refuse to meet the request in such circumstances.

We may need to request specific information from the user, to help us confirm their identity and to guarantee their right to access information (or exercise any of the other rights). This is another security measure to ensure that personal information is not disclosed to people who do not have the right to receive it.



## 11 Updates of data protection policy

Our Privacy Policy may change from time to time and any changes will be communicated to you via an email or a notice on our website.

Segrate

21/05/2018

eGlue Data Protection Officer

