#### **PRIVACY POLICY**

(pursuant to Articles 13 and 14 of the European General Data Protection Regulation 2016/679 - 'GDPR')

**Data Controller:** World Technology

Data processor:

ORION SKY GLOBAL SRL, registered office in Turin, via Caboto, 35, appointed data controller for the purpose.

contact details: dpo@orionskyglobal.com

The purpose of this notice is to explain how the Data Controller collects, uses and stores your personal data. For the purposes of this information notice, 'personal data' is defined as any information relating to an identified or identifiable natural person; 'processing' is defined as any operation of collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, comparison or interconnection, restriction, erasure or destruction, of personal data.

#### SOURCE OF PERSONAL DATA AND CATEGORIES OF DATA:

Your personal data are collected through the https://wts25.egms.net website and, in particular, through the forms present on its pages, such as, among others, those provided for purchasing services.

The personal data subject to processing are those:

- identification data (first name, surname, identity document references, etc.);
- computer data (e.g. log and User ID and PW for the management of the trading account);
- identification of the document

### 2. PURPOSE AND LEGAL BASIS OF THE PROCESSING OF PERSONAL DATA:

The Data Controller mainly processes your personal data for the fulfilment of contractual and legal obligations:

- for the purpose of registration on the 'EGMS' platform, which is necessary for managing the services purchased;
- for the performance of all activities that are instrumental and ancillary to the main ones and in any case necessary for the pursuit of the above purposes (such as, for example, registration, data processing, also for accounting purposes, filing, consultation and storage);

The processing of personal data for the aforementioned purposes is necessary, therefore any refusal will result in the non-provision of the service.

On a secondary and optional basis and without prejudice to the main purposes, the Controller may collect and process

- with your explicit consent, your data, and in particular your contact data, for information and promotional purposes, i.e. in order to update you via newsletters, on the activities of the site.
- Lastly, the Controller may process your personal data on the basis of the legitimate interest of guaranteeing the security and confidentiality of the processing carried out, taking into account, among other things, the voluntary application regulations referring to the ISO standards that the Controller adopts, and also in fulfilment of further legal obligations, when it carries out:
- control and monitor the hw and sw systems, applications and IT equipment used for processing personal data, and also when implements procedures for detecting and notifying personal data breaches.

## 3. CATEGORIES OF RECIPIENTS: to whom may the data be provided?

For the pursuit of the above-mentioned purposes, your data will mainly be transmitted to ORION SKY GLOBAL SRL (in its capacity as Data Processor for the management of the website and IT platform, etc.).

Furthermore, your data may be communicated to the competent authorities, in order to comply with legal obligations, regulations, also of EU origin, and provisions issued by authorities empowered to do so by law or by supervisory and control bodies or in the public interest.

## 4. TRANSFER OF DATA ABROAD AND OUTSIDE THE EU: Can your data be transferred abroad? Even outside the European Union?

The Data Controller processes data within the European Union or in third countries for which the European Commission has issued an adequacy decision or adequate guarantees exist.

## 5. DATA STORAGE PERIOD: How long will your data be stored?

With regard to collection and selection, data will be processed for a period of no longer than 6 months after the event. After this period has expired, the data may be anonymised and stored for statistical purposes only, otherwise permanently deleted.

6. **PROFILING:** No profiling is carried out.

# 7. RIGHTS OF THE DATA SUBJECT: What are your rights in relation to the processing of your data? You may exercise the following rights:

- a. Right of access to stored data, which implies the possibility of obtaining confirmation or otherwise that personal data processing is taking place;
- b. Right to rectification of data if you believe that the data are incomplete or inaccurate.
- c. Right of erasure, which may be exercised if the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed, if the data subject objects to the processing, if the personal data are unlawfully processed, if the personal data must be erased in order to comply with a legal obligation laid down by the law of the Union or of a Member State to which the Data Controller is subject;
- d. Right to restriction of processing which may be exercised when the data subject contests the accuracy of personal data, for the period necessary for the Data Controller to verify the accuracy of such personal data, when the processing is unlawful and the Data Subject objects to the erasure of the personal data and requests instead that its use be restricted, when, although the Data Controller no longer needs the personal data for the purposes of the processing, the personal data are necessary for the Data Subject to ascertain, exercise or defend a legal claim, when the Data Subject has objected to the processing pending verification as to whether the Data Controller's legitimate reasons prevail over those of the Data Subject.
- e. Right of portability, which means the right for the data subject to receive personal data concerning him or her in a structured, commonly used and machine-readable format, including for transmission to another data controller, provided that the processing is based on consent or on a contract, the data have been provided by the data subject and the processing is carried out by automated means.
- f. Right of objection and withdrawal of consent: on grounds relating to your particular situation, you may object at any time to the processing of your personal data if it is based on legitimate interest, by sending your request to the Controller at the addresses listed below. You have the right to the deletion of your personal data if there is no legitimate reason overriding the one that gave rise to your request.

The aforementioned rights may be exercised by means of a written request to be addressed to World Technology (as data controller) or directly to the data controller via the contact details above.

You also have the right to lodge a complaint concerning the processing of your data with the Garante per la Protezione dei dati personali (https://www.garanteprivacy.it).