

Information on the processing of personal data pursuant to Art. 13 of EU Regulation 2016/679 (General Regulation on Data Protection)

1. Subject-matter of the data processing

The data controller processes personal, identification and non-sensitive data (specifically: name, surname, city, e-mail, user name, mobile phone number) disclosed on registration.

2. Purpose of the processing of personal data

Personal data processed to:

- perform all activities necessary to enable access to the public connectivity service through a Wi-Fi platform;
- extract statistics regarding service use;
- fulfil specific data subject requests prior to the termination of the agreement;
- manage any complaints and/or disputes;
- fulfil pre-contractual, contractual and tax obligations arising from existing relationships;
- fulfil any obligations established by law, regulation, EC law or public authority order;
- prevent or detect fraudulent activities or abuse harmful to the service;
- exercise the rights of the data controller, such as the right of defence in legal proceedings.

3. Procedure for processing of personal data

The processing of personal data is performed by means of the operations indicated in Art. 4 no. 2) of Regulation (EU) 2016/679 (the "Regulation") specifically: collection, recording, organisation, storage, consultation, use, selection, extraction, blocking, communication, erasure and destruction of data. Personal data are processed both on paper and by electronic and/or automated means.

The data controller will process the personal data for the time necessary to fulfil the above purposes and in any case will proceed to store them in accordance with Article 24 of Law no. 167 of 20 November 2017 for 72 months.

4. Access to personal data

The personal data may be made accessible for the purposes referred to in point 2 to employees and partners of the data controller and the data processors in their capacity as authorised data subjects and/or system administrators.

5. Communication of personal data

The Data Controller does not require explicit consent to communicate the personal data for the purposes referred to in point 2 to the supervisory authority, judicial authorities and to all other parties to whom such communication is required by law for the fulfilment thereof. The data will not be disseminated.

6. Transfer of personal data

The management and storage of personal data will take place on servers - located within the European Union - at the disposal of the data controller and/or third-party companies contracted and formerly appointed as data processors. The servers are currently located in Italy.

7. Nature of provision of personal data and consequences for the data subject of refusal to provide the information

The provision of personal data for the purposes referred to in point 2 are required in order to use the service. In case of failure to provide the requested personal data, it will not be possible to guarantee the services provided for under point 2.

8. Rights of the data subject

As a data subject, the rights referred to in Articles 15 et seq. of the Rules of Procedure are recognised, specifically the rights of:

- I. access to personal data;
- II. obtainment of rectification or erasure or the restriction of processing thereof;
- III. data portability;
- IV. lodging a complaint with the supervisory authority.

9. Means of exercising rights

The data subject may exercise their rights by contacting the data controller at the addresses indicated in point 10.

10. The data controller, the data protection officer and the data processor.

The data controller of the personal data referred to in this document is the Friuli Venezia Giulia Region, represented by its temporary Chairman.

Mauro Vigni, acting as Chairman, Board Resolution no. 2497 dd. December 18, 2014 and no. 538 dd. March 15, 2018, is the Data Protection Officer (DPO) pursuant to Article 28 of the EU Regulation as of May 25, 2018.

Chairman

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INSIEL (Informatica per il Sistema degli Enti Locali) S.p.A. with Friuli Venezia Giulia Autonomous Region as sole shareholder, manager and coordinator with registered office at Via San Francesco d'Assisi 43 – 34133 Trieste is the data controller connected with the provision of the relevant service.

INSIEL S.p.A. appointed the Consortium CINECA as data processor pursuant to Article 28.2 of the Regulation.

11. Amendments to this document

This document may be added to, orally or in writing, with further elements and guidance, to better satisfy any other known need of the relevant data subject in relation to "processing of personal data" and to comply with regulatory developments.