PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA pursuant to Article 13 of EU Regulation 2016/679

Bit4id S.r.l. processes personal data in compliance with the provisions of European Regulation No. 679/2016 concerning the protection of natural persons with regard to the processing of personal data, as well as the free movement of such data (hereinafter, the "Regulation").
Pursuant to Article 13 of the Regulation, the following information is provided regarding the identification details of the data controller and the information concerning the processing of your personal data in relation to contracts and the provision of qualified trust services, hereinafter the "Services".

Data Controller

The Data Controller is Bit4id S.r.l. (hereinafter, "Bit4id" or "Controller"), with its registered office at Via Diocleziano 107 – 80125 Naples (NA), VAT No. IT 04741241212.
The Data Protection Officer (DPO) can be contacted at the following email address: dpo@bit4id.com.

Types of Data Processed

In the context of the Services provided by Bit4id, the following categories of personal data will be processed:

- **Personal details** (name, surname, tax code, gender, date and place of birth, nationality);
- **Identity document details and copies of the identity document and health card/tax code**;
- **Address data** (residence/domicile);
- **Contact details** (telephone number and email address);
- **Browsing and log data** (IP address, connection data, domain names and other parameters relating to the operating system and browser you use);
- **Payment data** (IBAN and bank/postal details).

Purpose and Legal Basis of the Processing

Your data will be processed for the following purposes::

a. Conclusion of the contract and use of the services: legal basis: Art. 6(1)(b) GDPR – Contract;
b. Management and response to technical support requests, including online: legal basis: Art. 6(1)(b) GDPR – Contract;
c. Compliance with legal or regulatory obligations, national or EU: legal basis: Art. 6(1)(c) GDPR – Legal obligation;
d. Sending information with informational content: legal basis: Art. 6(1)(f) GDPR – Legitimate interest of the Controller;
e. Statistical, business, and market analysis carried out in an anonymous and aggregated form: legal basis: Art. 6(1)(f) GDPR – Legitimate interest of the Controller;
f. Judicial protection of Bit4id's rights: legal basis: Art. 6(1)(f) GDPR – Legitimate interest of the Controller;
g. Prevention of fraudulent activities by verifying the reliability of the data provided by the data subject during identification: legal basis: Art. 6(1)(f) GDPR – Legitimate interest of the Controller.

Provision of Data

Providing the data listed under points a), b), c), f), and g) is mandatory to allow the conclusion of the contract or the provision of the requested services.
Providing data for the remaining purposes is optional: you may at any time request the Controller to stop such processing without affecting the provision of the Services.

Processing Methods and Access to Data

Bit4id processes your personal data in accordance with the principles of the Regulation and based on its legitimate interests related to the type of activity carried out and the need to execute existing contracts or pre-contractual measures requested by you.
Data collected through standard contracts in paper format are processed both on paper and electronically, and may be processed in aggregated form for statistical purposes and for quality control of assistance and maintenance services, excluding identifiable data in such cases.
Data collected through online forms are processed electronically and may be subject to automated processing via management information systems.
Data are accessible exclusively to authorised personnel, who are properly trained and informed about their duties and the activities permitted on the collected data. They operate on behalf of Bit4id and are assigned specific tasks through an appointment letter.
Bit4id will process your data for the purposes stated above, pursuing its legitimate interests that do not override your interests, rights, and freedoms.

Place of Processing and Transfer Abroad

Your personal data will be processed on Bit4id servers located within the European Union. If, in order to provide the requested services, it becomes necessary to transfer data outside the European Economic Area, the transfer will take place in accordance with one of the methods permitted by applicable law. In such cases, the recipients of the data will be required to comply with protection and security obligations equivalent to those guaranteed by Bit4id.

Scope of Communication and Possible Disclosure

Your personal data may be disclosed to third parties appointed as external data processors (the full list is available from the Controller) to group companies, or to commercial consultants for administrative and accounting purposes, as well as to legal consultants for any management of disputes.
Your data may also be communicated to law enforcement agencies or judicial authorities for the purpose of detecting or preventing crimes committed by users of telematic services, if necessary.
Furthermore, your data may be processed by third parties acting as Local Registration Authorities (LRA) or Registration Authority Operators (RAO), as defined in the service general terms, as well as by parties responsible for paper and/or digital storage, formally appointed as external processors or sub-processors by Bit4id.

Retention and Deletion of Personal Data

Bit4id will retain your data in a form that allows your identification for no longer than necessary to achieve the purposes described in this notice.
Identification data relating to the Services will be retained for 20 (twenty) years after the expiry or revocation of the Service, in accordance with Legislative Decree 82/2005 and subsequent amendments (Digital Administration Code).
Data strictly necessary for tax and accounting obligations will be retained for 10 (ten) years, as required by applicable regulations.
Service logs relating to Digital Signature, SPID, PEC will be retained for 6 (six) months to ensure correct tracking of service flows.
After these periods, personal data will be deleted or anonymised, unless further retention is required to fulfil legal obligations or to comply with requests from authorities.

Data Subject Rights

You are informed that you have the right to request, at any time, modifications to the processing arrangements set out in this privacy notice by exercising the rights referred to in the following section.
You may exercise the rights provided under Articles 15 (Right of access), 16 (Right to rectification), 17 (Right to erasure), 18 (Right to restriction of processing), 19 (Right to notification), 20 (Right to data portability), 21 (Right to object), and 22 (Right to refuse automated processing) of the Regulation.
Please note that the exercise of rights such as erasure or objection is subject to the limitations imposed by applicable laws concerning mandatory data retention for the Services.
To exercise your rights under Articles 15–22 of the Regulation, you must submit a written request to:

Bit4id S.r.l., Via Diocleziano 107 – 80125 Napoli (NA)
dpo@bit4id.com – bit4id@sicurezzapostale.it
You also have the right to lodge a complaint with the Data Protection Authority.