



PRIMATE®

evolutionary purpose company

PRIVACY POLICY PRIMATE SRL-SB **Last update: November 2019**

This document illustrates the rules that PRIMATE SRL-SB adopts for the collection of data online and for their use, in compliance with the privacy regulations in force (e.g. EU Regulation 2016/679), with particular regard to the principles of correctness, lawfulness and transparency, while protecting the privacy and rights of data subjects.

This information is provided pursuant to art. 13 of the aforementioned EU Regulation No. 2016/679 (GDPR) to those who interact with the web services of Primate accessible electronically from the address: <https://primate.consulting/>.

PRIMATE SRL-SB may amend or update this policy at any time. We will report the change, updating the date that appears at the top of the policy. We invite you to review the policy from time to time.

1. DATA CONTROLLER AND PERSONAL DATA PROCESSOR

The data provided will be processed by PRIMATE SRL-SB, based in Bastioni di Porta Nuova 21 - Milan, 20121.

2. DEFINITIONS

The following definitions and specifications are given below:

- "Site": <https://primate.consulting/>
- "User": means the user of the Site

3. TYPES OF PROCESSED DATA

The processed data are provided voluntarily by the user and detailed as follows:

- **Navigation data**

The computer systems and software procedures used to operate the Site acquire, during their normal operation, some personal data whose transmission is implicit in the use of internet communication protocols.

This information is not collected to be associated with identified subjects, but by its very nature could allow users to be identified.

This category of data includes the IP addresses or domain names of computers used by users who connect to the website, the URI (Uniform Resource Identifier) notation addresses of the requested resources, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (successful, error) and other parameters related to the operating system and the computer environment of the user.

These data are used for the sole purpose of obtaining anonymous statistical information on the use of the website and to check its correct functioning and are deleted immediately after processing.

The website does not use cookies for the transmission of information of a personal nature, nor are used the so-called persistent cookies, or systems for tracking users.

The use of so-called session cookies (which are not stored permanently on the user's computer and disappear when the browser is closed) is strictly limited to the transmission of such session identifiers (consisting of random numbers generated by the server) necessary to allow safe and efficient exploration of the website.

The session cookies used in this website avoid the use of other computer techniques potentially prejudicial to the confidentiality of the navigation of users and do not allow the acquisition of personal data identifying the user.



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- **Data provided voluntarily by the user**

The optional, explicit, and voluntary sending of e-mail to the addresses indicated on the site, involves the subsequent acquisition of the sender's address, necessary to respond to requests, as well as any other personal data contained in the message. Such data will be communicated to third parties only where necessary to comply with the requests of users/visitors themselves.

4. NATURE OF THE DATA AND CONSEQUENCES OF A REFUSAL TO REPLY

Apart from what is specified with reference to the navigation data, which are necessary in order to allow users a proper use of the Site, interested parties are free to provide their personal data to request a reply from PRIMATE SRL-SB. Failure to provide data may make it impossible to obtain what is requested.

5. PURPOSE OF DATA PROCESSING

The processing of the collected data is directed exclusively to the achievement of the following purposes:

- a. Activities related to the use of the services offered for navigating the website;
- b. Activities related and instrumental to the management of customer relations (contact requests);
- c. Marketing and profiling activities, only and exclusively with specific consent, aimed at market research; economic analysis and statistics; sending newsletters, also in relation to programs and promotions, also on-line, communications, development and maintenance of trade relations;
- d. Processing of curricular data for the evaluation of job applications.

6. METHODS OF DATA PROCESSING

The processing of data may consist of the following activities: collection, registration, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, cancellation and destruction, in accordance with art. 4 n. 2) of the GDPR.

Personal data are processed with manual, computerized and automated systems for the time necessary to achieve the purposes for which they are collected. The owner has specific security measures in order to ensure that the processing is carried out in compliance with the Code, having particular regard to the prevention of loss of such data, illicit or incorrect use or unauthorized access to databases. In particular, all technical and organisational measures appropriate to data protection will be taken to meet legal requirements and to protect the rights of data subjects.

7. LEGAL BASIS AND DATA RETENTION TIMES

The legal basis of the processing is the legitimate interest of the Data Controller and the expression of the consent of the interested party through interaction with our website. If you are already a customer of PRIMATE SRL-SB, we may send you commercial communications relating to services similar to those you are already using, unless you disagree.

8. DATA COMMUNICATION AND DISSEMINATION

The personal data collected on the Site are not subject to dissemination or communication and will not be sold or transferred to third parties. Without prejudice, in any event, to the communication or dissemination of data requested, in accordance with the law, by police forces, judicial authorities, information and security bodies or other public entities for purposes of defence or state security or for the prevention, detection or prosecution of criminal offences.



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9. RIGHTS OF THE DATA OWNER

In relation to the personal data processed, the data Owner may exercise the following rights under Articles n° 15, 16, 17, 18, 20, 21 of the GDPR, in particular:

- a. The right of access to personal data;
- b. Correction in case of inaccuracy;
- c. Deletion of data;
- d. Limitation to processing;
- e. Right to data portability, that is to receive in structured format, common and readable by automatic device, the personal data provided and to obtain the transfer to another Data Controller without hindrance;
- f. The opposition to the processing.

These rights can be exercised by writing to the e-mail address of the Data Controller, info@primate.consulting.

Moreover, according to art. n.° 77 of the EU Regulation 2016/679, the data Owner has the right to lodge a complaint with the Guarantor Authority for the Protection of Personal Data in case he/she considers that the processing violates the aforementioned Regulation.

10. CONSENT WITHDRAWAL

The consent given in relation to the processing of the Owner's personal data may be revoked at any time, without prejudice to the lawfulness of the processing of data carried out in the period prior to the revocation, or further processing based on legal bases other than consent.