

## Privacy Policy of HWG Sababa S.r.l. with sole shareholder

*Information on the processing of personal data pursuant to Regulation (EU) 2016/679 ("GDPR") and Legislative Decree of June 30, 2003, No. 196 and subsequent amendments ("Privacy Code").*

This Privacy Policy describes, in the following sections, how HWG Sababa S.r.l. collects and processes the personal data of its customers, potential customers, and users of its website (<https://www.hwgsababa.com>), as well as in relation to any Whistleblowing reports.

### 1. Data Controller and Data Protection Officer

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The Data Controller is HWG Sababa S.r.l. with sole shareholder (hereinafter also "Data Controller", "Company" or "HWG Sababa"), with registered office in Piazza Tre Torri 2, 20145 Milano (MI), tel. 045 493 2800, [compliance@hwgsababa.com](mailto:compliance@hwgsababa.com).

Data Protection Officer is Mr. Christian Bernieri (e-mail [dpo@6ft.it](mailto:dpo@6ft.it)).

### 2. Purposes for which your personal data may be used and related legal bases. Categories of processed data

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**(a) Web Navigation:** to enable the navigation of our website; conduct aggregated statistical analysis aimed at measuring the proper functioning of this website, and, in case of cybercrimes, ascertain any responsibilities. Regarding the cookies used for this website, please consult our [cookie policy](#).

Processed Data: IP addresses, domain names, URIs, browser (user agent), tracking tools; usage data; number of users; city; device information; session statistics; latitude (city); longitude (city); browser information; email; name; surname; phone number; profession. These data are acquired by the computer systems responsible for the operation of this website.

Legal Bases: provision of services aimed at enabling users to navigate this website; legitimate interest in ensuring the proper functioning of computer systems and proceeding to ascertain possible offenses (possibly also based on a legal obligation).

**(b) Direct Marketing Communications:** sending commercial communications, newsletters, communications about initiatives and events, offers, and promotions via email and SMS, related to products and services marketed by the Data Controller.

Processed Data: Contact data (name, surname, email address, phone number, job title, company).

Legal Basis: Your consent, revocable at any time by writing to [compliance@hwgsababa.com](mailto:compliance@hwgsababa.com) or by clicking the appropriate section within the received marketing email. The revocation of consent does not affect the lawfulness of processing based on consent before revocation.

**(c) Newsletter Subscription:** periodic sending of newsletters for informational purposes. Our company collects your contact data through a dedicated section to send periodic communications via email with informative content about news, events related to our company, or, in general, topics related to cyber security.

Processed Data: Contact data (name, surname, email address, phone number, job title, company).

Legal Bases: In the case of informational newsletters, the execution of a contract represented by subscribing to the newsletter service; in the case of promotional newsletters, your specific consent to receiving this type of newsletter. Consent can always be revoked.

**(d) Contractual Fulfillment:** to fulfill a contract for the supply of products and/or services or other contractually agreed-upon operations, following your requests (after the signing of a specific contract).

Processed Data: Contact data (name, surname, email address, phone number).

Legal Bases: Execution of a contract of which the data subject is a part; execution of pre-contractual measures adopted at the request of the data subject.

**(e) Brand Promotion on Website, Social Channels, or Other Means:** on occasions such as events or fairs where video recording services are provided, HWG Sababa may collect your image data without providing compensation. This is done to promote its brand by publishing the content on this website, social channels, or other communication means (e.g., in print).

Processed Data: image data.

Legal Basis: your consent.

**(f) Defense of Rights in Legal, Administrative, or Extrajudicial Proceedings, and in Disputes Related to Offered Products and Services:** to defend the rights of HWG Sababa and/or take legal action or make claims against you and/or third parties in the course of legal, administrative, or extrajudicial proceedings or disputes related to offered products and services.

Processed Data: Contact data (name, surname, email address, phone number); any other types of personal data provided by you for the execution of a contract.

Legal Basis: Legitimate interest.

**(g) Compliance with Legal Obligations:** to comply with obligations imposed on HWG Sababa by laws, regulations, or provisions/requests from authorities authorized by law and/or supervisory and control bodies.

Processed Data: Contact data (name, surname, email address, phone number); any other types of personal data provided by you for the execution of a contract.

Legal Basis: Compliance with legal obligations.

**(h) Video Surveillance:** recording and monitoring access to our company headquarters in Verona, Genova and Pero. HWG Sababa processes your image data captured through video recording tools (following access to the Verona, Genoa or Pero headquarters) for the protection of the company's assets, as per the General Data Protection Regulation (EU) 2016/679 (GDPR) and the "EDPB Guidelines 3/2019 on processing personal data through video devices, version 2.0, adopted on January 29, 2020." Cameras are indicated by specific signs, and this information complements the summary provided through signs placed near the cameras.

Processed Data: Image data.

Legal Basis: Legitimate interest of HWG Sababa in protecting corporate assets.

**(i) Statistical Analysis and Profiling:** processing data for statistical purposes and analyzing and predicting your purchasing choices through algorithms and other automated systems. This is done to offer products and services that are increasingly satisfactory to our customers and to develop personalized promotions and/or commercial communications (profiling purpose).

Processed Data: Contact data (name, surname, email address, phone number), purchased products/services, and any other types of personal data provided by you for the execution of a contract.

Legal Basis: Your consent.

**(j) Transfer of Personal Data to Third Parties:** forwarding your personal data to third-party entities, commercial partners of HWG Sababa, to enable you to receive commercial communications, initiative and event communications, offers, and promotions via email and SMS in the following areas: information technology products and services.

Processed Data: Contact data (name, surname, email address, phone number).

Legal Basis: Your consent.

**(k) Participation in Webinars:** processing of your personal data (e.g., images) potentially recorded by audio-video recording systems during the consumption of the event (webinar) in deferred mode. The provision of data is necessary for the purpose of registration and participation in the webinar and the subsequent sending of service communications. Refusal to provide them prevents the registration from being completed.

Processed Data: Name, surname, email address, role and sector of affiliation, image data.

Legal Basis: Legitimate interest of HWG Sababa.

**(I) Quality Control, Research, and Development:** in order to improve the products and services of our company, HWG Sababa may use any information received within the contracted and delivered services for quality control and product and service development purposes. Before initiating this processing, your information will be anonymized so that it cannot be traced back to you.

Processed Data: Contact data (name, surname, email address, phone number, job title, company); any other types of personal data provided by you for the execution of a contract.

Legal Basis: Legitimate interest of HWG Sababa in meeting the expectations of its customers and continuing to improve its products and services.

**(m) Reports via the My Whistleblowing Zucchetti Platform or Other Methods:** personal data provided by you are used solely for the purpose of managing the Whistleblowing report made by you (according to the methods and channels specified in the Whistleblowing Regulation, available on the company's website in the dedicated section). The report may concern one of the Italian offices of HWG Sababa listed here: <https://www.hwgsababa.com/contacts>

Processed Data: Name; surname; email address; (optional) phone number.

Legal Basis: Legal obligation arising from the provisions of Article 6 of Legislative Decree no. 231 of 2001, as amended by Law no. 179 of 2017, concerning "Provisions for the protection of authors of reports of crimes or irregularities of which they have become aware in the context of a public or private employment relationship."

### **3. Recipients of Your Personal Data**

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To achieve the purposes listed above, we need to communicate your data to the following categories of entities:

- specifically authorized personnel within HWG Sababa who are entrusted with the processing of data.
- providers of services and IT platforms contracted by HWG Sababa (e.g., IT service providers), who act as "data processors" and are expressly appointed by HWG Sababa through the signing of a specific contract;
- autonomous data controllers such as credit institutions, insurance companies, and consultants who act independently as data controllers. Their involvement is necessary for carrying out operations related to the use of our services (e.g., processing payments, delivering purchased goods).
- in relation to Whistleblowing reports, your personal data may be accessed by employees responsible for investigating Whistleblowing reports and members of the Oversight Body pursuant to Legislative Decree no. 231/2001. Additionally, considering that Whistleblowing reports may be submitted through the My Whistleblowing software, the provider of the said application may also have access to your personal data, designated as the data processor under Article 28 of the GDPR. It is understood that, in line with the principle of protecting the confidentiality of the whistleblower as per Law no. 179/2017, the sharing of your personal data will be limited to what is strictly necessary to ensure confidentiality.

Contact details of external data processors performing activities in the interest of the Data Controller can be requested at the following email address: [compliance@hwgsababa.com](mailto:compliance@hwgsababa.com).

Per raggiungere le finalità sopra elencate, abbiamo la necessità di comunicare i suoi dati alle seguenti

### **4. Data retention of Your Personal Data**

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Your personal data undergoing processing will be retained only for the time necessary to achieve the purposes for which they were collected or for any other legitimate purpose connected (e.g., relevant for defense against claims made against our Company or in the presence of a legitimate interest).

Where your personal data are processed for two or more different purposes, we will keep such data until the purpose with the longest term expires. Below are the retention periods for the main purposes:

- (a) Website Navigation:** 6 months from the collection date, unless legal provisions, regulations, or measures of public or judicial authorities require a different retention period in relation to investigations related to potential computer crimes;
- (b) Direct Marketing Communications:** 24 months from registration. In case of service termination, your data will be deleted within 24 months;
- (c) Newsletter Delivery:** until the revocation of your consent. In case of service termination, your data will be deleted within 24 months;
- (d) Performance of a Contract for the Supply of Products and/or Services or Other Contractual Operations:** until the termination of the contract; even beyond in the case of disputes and/or for compliance with legal obligations;
- (e) Promotion of the HWG Sababa Brand:** until the revocation of your consent;
- (f) Defense of Rights in Legal, Administrative, or Extrajudicial Proceedings and in Disputes Arising in Connection with Offered Products and Services:** for the time during which the relevant claim can be pursued;
- (g) Compliance with Legal Obligations:** For the time imposed by laws, regulations, or provisions/requests of authorities authorized by law and/or supervisory and control bodies;
- (h) Video Surveillance:** two days (unless there are reports to Public Security and/or legal disputes);
- (i) Statistical Analysis and Profiling:** 24 months from registration;
- (j) Forwarding of Personal Data to Third Parties:** 24 months from registration. The revocation of consent does not affect the lawfulness of processing based on consent before revocation;
- (k) Participation in Webinars:** until the end of the webinar, except for your consent for the purpose described in 2.b – Direct Marketing Communications: in this case, your data will be retained for the aforementioned purpose for 24 months from the expression of your consent;
- (l) Quality Control, Research, and Development:** until the termination of the underlying contract in your relationship;
- (m) Reports via My Whistleblowing Zucchetti Platform:** the personal data provided by you will be deleted within 5 years from their collection.

## **5. Transfer of Personal Data to a Third Country or an International Organization**

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The Data Controller may transfer your personal data outside the European Economic Area ("EEA"). To safeguard your data in the context of international transfers, the Data Controller will implement appropriate safeguards, namely decisions of adequacy by the European Commission pursuant to Article 45 of the Regulation, standard contractual clauses approved by the European Commission, and contractual instruments providing adequate guarantees (Article 46 of the Regulation). Alternatively, transfers will take place in the presence of derogations provided for in Article 49 of the Regulation (e.g., data subject's consent, necessity of the transfer for contractual/pre-contractual measures, overriding public interest, the right to a legal defense, vital interests of the data subject or other individuals, data entered in a public register).

**Specifically regarding Whistleblowing reports via the My Whistleblowing Zucchetti platform:** the related processing takes place in Italy, and there is no activity of transfer or dissemination abroad or to non-EU countries. No data is communicated or disclosed, except for statistical purposes, and in any case, in an anonymous and/or aggregated manner.

## **6. Methods of data processing**

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The processing of your personal data is carried out by HWG Sababa with the aid of computer tools. The data will be stored on magnetic or paper media, always in compliance with the security requirements set out in the European Regulation and may be disclosed to the entities referred to in point 3 of this Privacy Policy.

**Specific to Whistleblowing reports:** personal data are processed both with automated/electronic tools and with manual tools for the purposes mentioned above. Specific security measures are implemented to prevent data loss, unlawful or incorrect uses, and unauthorized access.

HWG Sababa commits not to use reported data as inaccurate until the inaccuracy has been verified and, if existing, corrected.

## 7. Data subject rights

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As the data subject, you can exercise the rights guaranteed by the GDPR concerning your personal data by writing to [compliance@hwgsababa.com](mailto:compliance@hwgsababa.com). We commit to responding to your request as promptly as possible, but in any case, not later than 30 days from the receipt of your communication. We may request a copy of an identification document if, in relation to your request, it is necessary to verify your identity.

Among the rights guaranteed by the GDPR to the data subject are the following:

- The right of access, meaning the right to know if there is processing of personal data concerning you and, if confirmed, to obtain a copy.
- The right to obtain the rectification or integration of your data.
- The right to obtain the erasure of your personal data if they are no longer necessary for the purposes for which they were collected, or if we are no longer authorized to process them.
- The right to obtain the limitation of the processing of personal data in cases indicated by the GDPR.
- The right to data portability, meaning the right to receive personal data concerning you in a structured, commonly used, and machine-readable format, and the right to request that such data be transmitted to another data controller.
- The right to withdraw consent for processing based on it.
- The right to object at any time to the processing of your personal data based on our legitimate interest.

You also have the right to lodge a complaint with the competent data protection authority.

The contact details of external data processors acting in the interest of the Data Controller can be requested at the following address: [compliance@hwgsababa.com](mailto:compliance@hwgsababa.com).

## 8. Cookie

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Regarding the cookies used on this website, please refer to our cookie policy available at the following link: <https://www.iubenda.com/privacy-policy/33132937/cookie-policy>

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*We reserve the right to periodically update the content of this page. We encourage you to regularly check this information to stay informed about any changes made since your last visit.*