

WEB POLICY

Browsing Information Notice pursuant to Article 13 of EU Regulation 2016/679

Applicable Legislation:

- **EU Regulation No. 679 of 27 April 2016** on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter, the “EU Regulation” or “GDPR”).
- **Legislative Decree No. 196 of 30 June 2003** (hereinafter, the “Privacy Code”), as amended by **Legislative Decree No. 101 of 10 August 2018** and subsequent amendments and integrations.
- **Recommendation No. 2 of 17 May 2001** on the minimum requirements for online data collection within the European Union, adopted by the European data protection authorities gathered in the Working Party established under **Article 29 of Directive 95/46/EC** (hereinafter, the “Article 29 Working Party Recommendation”).

SimpleCyb Srl (hereinafter, the “Company”), with registered office at Via Strasburgo 18/A, Parma (Italy), VAT No. 07382220486, hereby informs users about the procedures and conditions applied by the Company in relation to the processing of personal data.

In particular, this notice concerns the personal data of users who access and use the Company’s website, available at the following domain:

 www.simplecyb.com

The Company acts as “**Data Controller**”, meaning “the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.”

The processing of personal data may, in practice, be carried out by individuals specifically authorised and instructed by the Company to perform data processing operations.

Pursuant to applicable data protection legislation, users who browse or use the Company’s website qualify as “**data subjects**”, i.e., the natural persons to whom the personal data refer.

Please note that this notice does **not** extend to any other websites that may be accessed by users through links — including Social Buttons — on the Company’s website.

Social Buttons are digital buttons or direct links connecting users to the Company’s social media pages (for example, LinkedIn, Facebook, Twitter, YouTube), each corresponding to a specific platform.

By clicking these links, users are redirected to the Company’s social media accounts.

The managers of such social media platforms operate as **independent Data Controllers**; therefore, any information regarding how these Controllers process users' personal data can be found in their respective privacy notices.

1. Personal Data Subject to Processing

In relation to the interaction with this website, the Company may process the following categories of users' personal data:

Applicable Legislation:

- EU Regulation No. 679 of 27 April 2016 (General Data Protection Regulation – “GDPR”);
- Legislative Decree No. 196 of 30 June 2003 (“Privacy Code”), as amended by Legislative Decree No. 101 of 10 August 2018 and subsequent amendments;
- Recommendation No. 2 of 17 May 2001 concerning minimum requirements for online data collection within the EU, adopted by the Working Party established under Article 29 of Directive 95/46/EC (“Article 29 Working Party Recommendation”).

a. Browsing Data:

The IT systems and software procedures that ensure the functioning of this website acquire, during their normal operation, certain personal data whose transmission is implicit in the use of Internet communication protocols.

Such information is not collected to be associated with identified data subjects but, by its very nature, could allow users to be identified through processing and association with data held by third parties.

This category of personal data includes IP addresses or domain names of users' computers connecting to the site, URI (Uniform Resource Identifier) 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 response status from the server (successful, error, etc.), and other parameters related to the user's operating system and computing environment.

These data are used solely to obtain anonymous statistical information on the use of the website and to verify its proper functioning.

Browsing data are stored for no longer than **12 months**, except where required by judicial authorities for the detection of criminal offences.

b. Data Voluntarily Provided by Users:

The voluntary, explicit, and optional submission of personal data to the Company — for example, through form completion on the website — entails the acquisition of the user's e-mail address and any other personal data requested in order to fulfil specific requests.

For information regarding the processing of personal data submitted through the **contact form**, please refer to the related “Contact Form Privacy Notice.”

2. Purpose and Legal Basis of the Processing

For the data described in point 1(a), personal data are processed automatically and **necessarily** by the Company to enable website browsing. Such processing is based on the Company's **legal obligations** and its **legitimate interest** in ensuring the correct operation and security of the website; therefore, users' express consent is **not required**.

For the data described in point 1(b), personal data are processed to provide information or assistance to users.

This processing is based on the performance of pre-contractual measures or specific user requests and does **not** require users' express consent.

3. Nature of the Provision of Personal Data

With reference to browsing data, the provision of personal data is **mandatory** as it is necessary for navigating the Company's website.

Users are otherwise free to provide their personal data in order to request information or assistance from the Company.

For data provided through the **contact form**, please refer to the related "Contact Form Privacy Notice."

4. Methods and Duration of Processing

Personal data are processed by authorised personnel who have been duly identified and trained by the Company.

Data processing is carried out using automated systems for access and navigation data.

For information on data provided through contact form submission, please refer to the relevant notice.

In any case, personal data processing is conducted in full compliance with security and confidentiality requirements, ensuring — among other aspects — accuracy, updating, and relevance in relation to the stated purposes.

Browsing data (point 1a) are retained for no longer than **12 months**, while other data are processed for the time strictly necessary to achieve the purposes for which they were collected or in accordance with legal deadlines.

The Company has adopted specific security measures to prevent data loss, unlawful or incorrect use, and unauthorised access.

5. Recipients of Personal Data

For the purposes described herein, personal data may be communicated within Italy or abroad, but only within the **European Union (EU)** or **European Economic Area (EEA)**, for compliance with legal obligations.

For further details on recipients of data submitted via the contact form, please refer to the specific related notice.

Personal data will **not** be transferred outside the EU or EEA, nor will they be disseminated or made available to the public or to an indefinite number of recipients.

6. Data Subjects' Rights (Articles 15–21 of EU Regulation 2016/679)

Users, as data subjects, may exercise the following rights under the GDPR:

- **Access** to their personal data (Art. 15);
- **Rectification** of inaccurate or incomplete data (Art. 16);
- **Erasure ("right to be forgotten")** (Art. 17);
- **Restriction** of processing (Art. 18);
- **Data portability**, where applicable (Art. 20);
- **Objection** to processing (Art. 21).

Requests to exercise these rights may be sent to:

 info@simplecyb.com

If the Company does not respond within the legally prescribed timeframe or if users consider the response unsatisfactory, they may lodge a complaint with the **Italian Data Protection Authority (Garante per la Protezione dei Dati Personali)**:

Garante per la Protezione dei Dati Personali

Piazza Venezia 11, 00187 Rome (Italy)

Fax: (+39) 06.69677.3785

Telephone: (+39) 06.69677.1

E-mail: protocollo@gpdp.it