



PRIVACY POLICY

	SUITABILITY	ADEQUACY
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Confidentiality level	Public	
Interested parties	N/A	

VERSION HISTORY

DATE	REVISION	CREATED BY	CHANGE DESCRIPTION
09/01/2025	1.0	Emanuela Gotta	First draft – Revision based on the document “PDR43_2018_Privacy Policy_1.5”

REFERENCES TO STANDARDS

STANDARDS	SPECIFIC REFERENCE
UNI CEI EN 17799:2024	Personal data protection requirements for processing operations (§5.3.4 Data minimisation) (§5.4 Personal data protection policy)
UNI CEI EN ISO/IEC 27001:2017	ANNEX A - A.08.02.03 Asset handling

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1. PURPOSE AND SCOPE

The purpose of this document is to describe the personal data protection policy established by Compet-e's management, with particular regard to processing activities.

The policy has been established by management:

- in line with the organization's purposes and with the personal data processing operations carried out by the organization;
- to provide a clear framework for setting personal data protection objectives in the ICT area;
- as a commitment to meet the applicable and relevant requirements for personal data protection in the ICT area, in accordance with the requirements of PdR43:2018 and the applicable regulatory framework;

The policy, periodically reviewed by management:

- constitutes a commitment to continuous improvement in personal data protection in the organization's ICT area;
- is considered adequate for the company's organization, also taking into account its geographical distribution, the architecture of the IT infrastructure, connectivity aspects and the connection of ICT networks and systems, as well as policies and agreements with third parties (e.g., clients and suppliers) for data exchange.

This document derives from the document **ISO17799_ISMS_Personal Data Protection Policy**.

2. PERSONAL DATA PROTECTION POLICY

Compet-e undertakes to comply with the applicable laws and regulations on personal data protection in the countries where the organization operates or provides its services. This Policy sets out the basic principles according to which the organization processes the personal data of employees, clients, suppliers, business partners and other persons, and indicates the responsibilities of its organizational units and employees when processing personal data.

The purpose of this policy is to protect and safeguard the personal data of data subjects processed by the organization within its business processes and the services provided, with special regard to citizens belonging to the EEA.

This policy takes into account the following mandatory requirements:

- **Regulation (EU) 2016/679 ("GDPR")**, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data;
- the **Italian Privacy Code (Legislative Decree 196/2003)**, as amended by **Legislative Decree 101/2018**;
- the **decisions and guidelines** of the **Italian Data Protection Authority** and, where applicable, of the **European Data Protection Board (EDPB)**;
- **UNI CEI EN 17799:2024**, which defines the requirements for personal data protection in **processing operations**: this document constitutes the "**personal data protection policy**" pursuant to §5.4, providing guidance for **planning** (Ch. 5), **operational activities** (Ch. 6) and **control** (Ch. 7).

The guiding principles of Compet-e's policy derive from Article 5 of the GDPR and from the Reference Practice.

The policy is structured around the following points:

A. LAWFULNESS, FAIRNESS AND TRANSPARENCY

Personal data are processed by Compet-e lawfully, fairly and transparently in relation to the data subject.

B. PURPOSE LIMITATION

Personal data are collected by Compet-e for specified, explicit and legitimate purposes and are subsequently processed in a manner that is not incompatible with those purposes.

C. DATA MINIMISATION

The personal data collected by Compet-e are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed. Compet-e ensures the anonymisation or pseudonymisation of personal data, where possible, in order to reduce the risk to data subjects.

We collect only the data **strictly necessary** for the stated purposes; **optional fields** are clearly indicated and failure to provide them does not affect services that are **not necessary** for those purposes.

D. ACCURACY

Compet-e ensures that data are accurate and, where necessary, kept up to date; Compet-e takes all reasonable steps to erase or rectify without delay inaccurate data in relation to the purposes for which they are processed.

E. STORAGE LIMITATION

Compet-e ensures that personal data are kept for no longer than is necessary for the purposes for which they are processed.

F. INTEGRITY AND CONFIDENTIALITY

Taking into account the available technologies and other security measures, the implementation costs and the likelihood and severity of risks to personal data, Compet-e implements technical and organizational measures to ensure an appropriate level of security for personal data, including protection against accidental or unlawful destruction, loss, alteration, unauthorized disclosure or access.

G. ACCOUNTABILITY

Compet-e is responsible for complying with the principles described above.

In this regard, Compet-e adopts the following definition/translation of the principle of Accountability provided by Prof. Francesco Pizzetti, former President of the Italian Data Protection Authority: ***“Accountability means being worthy of the trust placed by data subjects”***, whoever they may be. This vision is fundamental for Compet-e, as it combines and makes coherent the organization’s business purposes with the guiding principles of “Data Protection”.

H. COLLECTION OF PERSONAL DATA

Compet-e is constantly committed to collecting the smallest possible amount of personal data. Where personal data are collected from third parties, Compet-e ensures that such personal data are collected lawfully.

I. USE, STORAGE AND DISPOSAL

Compet-e ensures that the purposes, methods, recording limit and retention period of personal data are consistent with the information contained in the Privacy Notice (Articles 13 and/or 14 of the GDPR). Compet-e ensures the accuracy, integrity, confidentiality and relevance of personal data based on the purpose of the processing. Compet-e uses appropriate security mechanisms designed to protect personal data, prevent them from being stolen or used improperly or unlawfully, and prevent personal data breaches.

J. ACTIVITIES CARRIED OUT BY THIRD PARTIES

Whenever Compet-e uses a third-party supplier or business partner to process personal data on its behalf, it undertakes to ensure that such party provides security measures appropriate to the risks associated with safeguarding the personal data.

Compet-e commits the supplier or business partner already at contractual level (or through confidentiality agreements, contractual clauses and/or qualification questionnaires) so that it implements a level of protection appropriate to the risks. The

supplier or business partner shall process personal data only to fulfil its contractual obligations towards Compet-e or according to Compet-e's instructions, and not for other purposes.

K. CROSS-BORDER TRANSFER OF PERSONAL DATA

Before transferring personal data outside the European Economic Area (EEA), Compet-e verifies whether the country concerned is subject to an adequacy decision. If not, Compet-e first analyses whether the service or process involving the data transfer can be redesigned so that the data are transferred to an adequate country. Where possible, this solution is adopted. If this is not possible, Compet-e assesses which appropriate protection measures (safeguards) must be implemented (Article 46 GDPR).

L. DATA SUBJECTS' RIGHT OF ACCESS

Compet-e is aware of its commitment to respond, within the prescribed time limits, to data subjects' requests and to provide data subjects with a reasonable mechanism allowing them to access their personal data and submit requests for the updating, rectification, erasure or transmission of their personal data, where applicable or required by law. The access mechanism is detailed in the relevant policy.

M. DATA PORTABILITY

Data subjects have the right to receive, upon request, a copy of the data they have provided to Compet-e in a structured format and to transmit those data to another Controller free of charge.

N. RIGHT TO ERASURE

Upon request, data subjects have the right to obtain from the Organization the erasure of their personal data. Where the Organization acts as Controller, it takes the necessary actions, including technical measures, to also involve the third parties processing such data in order to comply with the request.

O. COMMUNICATIONS TO DATA SUBJECTS

At the time of collection, or before collecting personal data for any type of processing activity, Compet-e adequately informs data subjects at least of the following: the types of personal data collected, the contact details of the Controller and the DPO, the purposes of processing, the methods of processing, the rights of data subjects regarding their personal data, the retention period, any potential international data transfers and whether the data will be shared with third parties. This information is provided through a Privacy Notice.

Where personal data are shared with third parties, Compet-e ensures that data subjects have been informed of this through a Privacy Notice.

P. OBTAINING CONSENT

Whenever the processing of personal data is based on the data subject's consent, Compet-e keeps a record of such consent. Compet-e ensures that data subjects are provided with options to give their consent and guarantees that their consent, whenever used as the legal basis for processing, can be withdrawn at any time.

Personal data are processed only for the purposes for which they were originally collected. If Compet-e wishes to process the personal data collected for another purpose, it shall request the data subjects' consent in clear and concise written form. Any such request shall include the original purpose for which the data were collected as well as the new or additional purposes.

Q. ROLES AND RESPONSIBILITIES

Compet-e firmly believes that the personal data protection policy must be followed and pursued day by day, in everyday decisions taken and operations carried out. To this end, it has carefully defined the "Roles and Responsibilities" in the field of Data Protection in order to ensure a clear allocation of tasks.

In order to comply with and satisfy these points, Compet-e has also adopted a company regulation.

3. COMMUNICATION METHODS AND POLICY REVIEW

Periodically, during management reviews, this policy will be reviewed and, where necessary, updated.

Compet-e makes this policy available to interested parties in the appropriate forms and methods, including through its website.

4. VIOLATIONS

Compet-e implements procedures to address any violations of this policy.