

## PRIVACY POLICY

This privacy policy sets out how **SAA INTERNATIONAL ASSISTANCE, SRL**, (hereinafter **SAA**) uses and protects any information provided through **www.saa-international.com** (hereinafter also referred as the “website”).

**SAA** is serious about protecting the users’ privacy. Therefore, **SAA** applies the General Data Protection Regulation (GDPR) (EU) 2016/679 to ensure that their privacy is protected.

Should **SAA** ask you (the user) to provide certain information by which you can be identified when using this website, be assured that it will only be used in accordance with this privacy statement.

Please, read the following carefully to understand **SAA**’s views and practices regarding personal data.

### 1. Name and Address of the Controller

The Data Controller that will collect and process your personal data is:

- **SAA INTERNATIONAL ASSISTANCE, SRL** (hereinafter **SAA**)
- Registered at the Verona Business Registry with the number IT08051000969
- Address: Via Pacinotti, 4/b/15, 37100 Verona. Italy.
- TEL: 0039-045-825 11 11
- FAX: 0039-045-825 11 55
- e-mail: info@saa-international.com

### 2. Data collected

While using the website, **SAA** may ask you to provide certain personally identifiable information that can be used to contact or identify you. Personally identifiable information may include, but is not limited to, your email address, name, phone number, postal address,

### 3. Purposes of the processing

The purposes for which personal data is processed are the following:

1. Identifying users correctly;

2. Providing information requested by the users through the contact-form located on the website;
3. Understanding users and their needs through analytic analysis;
4. For management of basic administration processes;
5. In case where the user has signed an agreement with **SAA**, for providing requested services and for the performance of a contract; as well as for improving our services;
6. Sending promotional emails, newsletters or push notifications about services related to **SAA**, using the email address provided by the user. In each commercial communication, we will provide you with the appropriate information to exercise your right of objection in case you wish to object to the sending of commercial communications (you may unsubscribe at any time). The acceptance for receiving commercial information is always revocable, without retroactive effects.

**SAA** will not use personal data for profiling purposes and will not make any automated decision based on it.

#### **4. Data Storage**

The data shall only be stored for the time strictly required for each purpose of the processing and shall promptly be deleted straight afterwards, without prejudice to the legal storage obligations provided for by the law. According to that:

- In case where the user has entered into an agreement with **SAA**, the personal data will be kept as long as the contractual relationship between the parties is maintained and, in any case, until legal liabilities are extinguished definitively (by expiry of the statute-of-limitations period).
- In all other cases, the personal data provided will be kept as long as the data deletion is not requested by the user. Likewise, data will be kept according to the legal time-frame set forth in legal, fiscal and accounting matters, taking as reference the date of the request for data deletion.

#### **5. Legal bases for processing**

The legal bases for the processing are the following

- In case where the use has entered into an agreement with **SAA**, the legal basis for the processing is the performance of the contract entered into the parties.
- In all other cases, the legal basis for the processing is the consent provided by the user.

## 6. Data disclosure

Users personal data may be disclosed to third parties which are companies that provide services to **SAA**. However, **SAA** has made its best efforts in checking that all its providers apply GDPR's principles to protect personal data and that such providers only process data for each specific purpose under written instructions.

Some personal data of users may be stored in or transferred to a destination outside the European Economic Area (EEA). It may also be processed by staff operating outside the EEA which provides services for **SAA**. **SAA** will take all reasonable steps necessary to ensure that users' data is treated securely.

**SAA** may also disclose personal data of users as required by law, or when we believe in good faith that disclosure is necessary to protect our rights, protect the safety of our users or the safety of others, investigate fraud, or respond to a government request.

## 7. Rights of the Data Subject

Each user (data subject) has the following rights regarding his or her personal data:

a) Right of confirmation: to obtain from the controller the confirmation as to whether or not personal data concerning him or her is being processed. If a data subject wishes to exercise this right, he or she may at any time contact the controller.

b) Right of access: to obtain from the controller free information about his or her personal data stored at any time and a copy of this information.

c) Right to rectification: to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her.

d) Right to erasure (Right to be forgotten): to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds Applies and as long as the processing is not necessary:

- The personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed.
- The data subject withdraws consent on which the processing is based according to point (a) of Article 6 (1) of the GDPR, or point (a) of Article 9 (2) of the GDPR, and where there is no other legal ground for the processing.
- The data subject objects to the processing pursuant to Article 21 (1) of the GDPR and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21 (2) of the GDPR.
- The personal data has been unlawfully processed.
- The personal data has to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.

- The personal data has been collected in relation to the offer of information society services referred to in Article 8 (1) of the GDPR.

e) Right of restriction of processing: to obtain from the controller restriction of processing where one of the following Applies:

- The accuracy of the personal data is contested by the data subject, for a period enabling the Controller to verify the accuracy of the personal data.
- The processing is unlawful and the data subject opposes the erasure of the personal data and requests instead the restriction of their use instead.
- The controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims.
- The data subject has objected to processing pursuant to Article 21 (1) of the GDPR pending the verification whether the legitimate grounds of the controller override those of the data subject.

f) Right to data portability: to receive the personal data concerning him or her, which was provided to a controller, in a structured, commonly used and machine-readable format. He or she shall have the right to transmit those data to another controller without hindrance from the controller to which the personal data has been provided as long as the processing is based on consent and the processing is carried out by automated means. Furthermore, in exercising his or her right to data portability pursuant to Article 20 (1) of the GDPR, the data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible and does not adversely affect the rights and freedoms of others.

g) Right to object: to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on point (e) or (f) of Article 6 (1) of the GDPR. This also Applies to profiling based on these provisions.

i) Right to withdraw data protection consent: to withdraw his or her consent to processing of his or her personal data at any time.

If the data subject wishes to exercise any of the aforementioned rights, he or she may at any time directly contact the data controller by sending the appropriated request at the following addresses:

- Address: Via Pacinotti, 4/b/15, 37100 Verona. Italy.
- [info@saa-international.com](mailto:info@saa-international.com)

Finally, each data subject has the right to lodge a complaint before the Supervisory Authority.