

## PRIVACY POLICY (GENERAL DATA PROTECTION REGULATION – ART: 13-14 of the GDPR)

TStat S.r.l., with registered offices in via Rettangolo, 12/14 Sulmona (AQ) Italy - tel. 0864 210101 – mail: [tstat@tstat.it](mailto:tstat@tstat.it) – PEC: [tstat@tstat.ticertifica.it](mailto:tstat@tstat.ticertifica.it), recognises the importance of maintaining the confidentiality, integrity and security of your personal data (“*Personal Data*”) and hereby inform you that any *Personal Data* which you provide to TStat S.r.l. either through our Websites ([www.tstat.it](http://www.tstat.it), [www.tstat.eu](http://www.tstat.eu) and [tstattraining.eu](http://tstattraining.eu)) or any personal or company data which you may provide directly to us, will be processed in compliance with the current European Union privacy laws (Regulation (EU) 2016/679 – “*GDPR*”) and with any special local regulations application from time to time for the processing of data outside the European Union.

This Privacy Policy Statement (“*Privacy Policy*”) describes the ways TStat S.r.l. (“*our Company*”) collects information from and about you, and what we at TStat do with the information, so that you may decide whether or not to provide information to us. By accessing our website or purchasing our products or services you agree to this Privacy Policy in addition to any other agreements we might have with you. In the event of such agreements contain terms that conflict with this Privacy Policy, the terms of those agreements will prevail. This Privacy Policy does not govern the practices of entities that our Company does not own or control, or entities that do not own or control our company or people that our Company does not employ or manage.

### 1. Collection of your Personal Information

The information we collect may include your name (first and last name), position, address, email address, phone number, tax registration number, goods or services transaction information, preferences you submit and preferences that are generated based on the data you submit, number of clicks, messages, communications, postings, log-ins (if you are in possession of a technical support account on one of our Websites), network activity, product and service selections and other things that identify you. We collect personal information from you at several different points, including, but not limited to the following:

- when we correspond with you as a customer or prospective customer;
- when you visit our website;
- when you register as an end-user of our services via one of our websites;
- when you contact us for help;
- when you attend our customer conferences, courses or webinars; and
- when the site sends us error reports or application analytics data.

### 2. Our Company Use of your Personal Information

TStat S.r.l. may use information that we collect about you to:

- conclude any commercial contracts relating to the purchase of our goods and services;
- manage your customer relationship and provide you with customer support;
- help improve our products and services and customize user experience;
- perform research and analysis about your use of, or interest in, our products, services, or content, or products, services or content offered by others;

- communicate with you by e-mail, postal mail, telephone and/or mobile devices about our products or services that may be of interest to you;
- develop and display content and advertising tailored to your interests on our site and other websites;
- enforce our terms and conditions;
- manage our business; and
- perform functions as otherwise described to you at the time of collection.

### 3. Data Processing Methods

Your Personal Data will be processed by suitable electronic or automated means and computerised tools, or manually and on hard copy, exclusively for the purposes for which they have been collected and guaranteeing the security and confidentiality of any processed information. Your Personal Data will be processed only by TStat S.r.l. and subsidiaries or internal staff duly authorised to do so under their respective job duties. Your personal data may also be processed by third parties to the extent necessary and/or instrumental for the above purposes. These third parties will act on behalf of TStat S.r.l. as data processors (e.g. service providers, carriers, IT technicians or any other suppliers appointed by TStat S.r.l. to carry out and/or manage any promotional campaigns for TStat's products and services, etc.).

### 4. Our Transfer and Disclosure of your Personal Information to Third Parties

Our Company may use information that we collect about you with third parties ONLY in the ways that are described in this Privacy Policy:

- we may provide your information to our sub-processors (for example course leaders) who perform functions on our behalf;
- third party contractors may have access to our databases. These contractors do however, sign a standard confidentiality agreement with TStat S.r.l.;
- we may share your data with any parent company, subsidiaries, joint ventures, other entities under a common control or third-party acquirers. We expect these other entities will honour this Privacy Policy;
- we may allow a potential acquirer or merger partner to review our databases, although we would restrict their use and disclosure of this data during the diligence phase;
- as required by law enforcement, government officials, or other third parties pursuant to a subpoena, court order, or other legal process or requirement applicable to our Company; or when we believe, in our sole discretion, that the disclosure of personal information is necessary to prevent physical harm or financial loss, to report suspected illegal activity or to investigate violations of our agreements or Company policies;
- we may share your information with third parties (for example, the software producers we represent (necessary to allow them to issue you with a software licence)) with your consent or direction to do so. Please note that these third parties may be in countries outside the EU, where the laws on processing personal information may be less stringent than in your country. We reserve the right to use, disclose and transfer non-personal information to our partners, advertisers and other third parties at our discretion.

**Your Personal Data will not be used for third-party advertising purposes or for the promotion of products, services or initiatives by entities other than the TStat Group, nor shall they be disclosed to unknown persons under any circumstances.**

### 5. The Security Measures Taken to Protect your Personal Information

TStat S.r.l. uses industry-standard technologies when transferring and receiving data exchanged between our Company and other companies to help ensure its security. Our internet sites have security measures in place to help protect information under our control from the risk of accidental or unlawful destruction or accidental loss, alteration or unauthorized disclosure or access. However, "perfect security" does not exist on the Internet. Moreover, if our

websites contain links to external sites, our Company is not responsible for the security practices or the content of such sites.

## 6. TStat S.r.l.'s Use of Cookies, Web Beacons, Web Analytics Services, and Links

- **Cookies:** Many of our web pages use “Cookies.” Cookies are text files we place in your computer’s browser to store your preferences. Cookies, by themselves, do not tell us your e-mail address or other personally identifiable information unless you choose to provide this information to us by, for example, registering at one of our sites. However, once you choose to furnish the site with personal information, this information may be linked to the data stored in the cookie. We use cookies to understand site usage and to improve the content and offerings on our sites. We also may use cookies to offer you products, programs, or services. You have many choices with regards to the management of cookies on your computer. All major browsers allow you to block or delete cookies from your system. To learn more about your ability to manage cookies, please consult the privacy features in your browser;
- **Web Beacons:** Our Company and third parties may also use small pieces of code called “web beacons” or “clear gifs” to collect anonymous and aggregate advertising metrics, such as counting page views, promotion views, or advertising responses. These “web beacons” may be used to deliver cookies that conform to our Company’s cookie requirements;
- **Web Analytics Services:** We use *Google Analytics*, a service for the marketing analysis of the site provided by Google, Inc. *Google Analytics* uses cookies to allow us to see how you use our sites so we can improve your experience. Google’s ability to use and share information collected by *Google Analytics* about your visits to the site is restricted by the *Google Analytics Terms of Use* available at <http://www.google.com/analytics/terms/us.html> and the *Google Privacy Policy* available at <http://www.google.com/policies/privacy/>. You can prevent Google Analytics from recognizing you on return visits to the site by disabling cookies in your browser. If you prefer to not have data reported by Google Analytics, you can install the *Google Analytics Opt-out Browser Add-on* available at <https://tools.google.com/dlpage/gaoptout/>;
- **Links:** We may create links to other web sites. We will make a reasonable effort to link only to sites that meet similar standards for maintaining each individual’s right to privacy. However, many other sites that are not associated with or authorized by our Company may have links leading to our site. Our Company cannot control these links and we are not responsible for any content appearing on these sites. Since this website does not control the privacy policies of third parties, you are subject to the privacy practices of that third party. We encourage you to ask questions before you disclose any personal information to others;
- **Other:** Our Company websites may use third parties to present or serve the advertisements that you may see at its web pages and to conduct research about the advertisements and web usage. This Privacy Policy does not cover any use of information that such third parties may have collected from you or the methods used by the third parties to collect that information.

## 7. Videoconferences and Online Training Initiatives

Videoconferences and online training activities will take place via TStat Training’s Zoom account. The utmost care will be taken with regards to security when using Zoom’s portal. Interested parties are however, referred to Zoom’s own privacy policy (published at <https://zoom.us/it-it/privacy.html>) and conditions regarding the use of their platform, with reference to the management of personal data in this context. TStat S.r.l. cannot be held responsible for any disputes or liabilities arising from other the use and conditions of the portal itself or for Zoom’s privacy policy.

Participants in all training or videoconference activities are required to comply with the following:

- Individual participants are obliged to maintain due confidentiality and diligence with respect to the data he or she has access to during the course of the videoconference or training initiatives, both during the course or

video conference itself and thereafter (Art. 326 of the Criminal Code and Art. 28 of Law 241/90);

- Dissemination (in any form) of teaching or auxiliary materials pertaining to our online conference and training activities, which are not deemed functional to the performance of the participant's work is prohibited. More specifically, it is not permitted to:
  - disclose to third parties and/or disseminate materials related to course content;
  - communicate/disseminate and/or reproduce in full and/or in part course or conference documentation, such as: handouts, software routines developed/used during the course, course datasets and any other type of teaching material acquired during the courses;
  - register (audio or video registration) during the course videoconference neither by means of the Zoom platform nor by any other personal device;
  - capture/share screenshots or images of course/videoconference on one's own PC or devices or on a network (internal servers, social networks, etc.).

Moreover, conference and/or course participants must:

- Securely store, and not divulge to third parties, personal access passwords or links received from TStat to directly access to the course or videoconference platform;
- Immediately communicate via email to [training@tstat.eu](mailto:training@tstat.eu) if he or she is unable to access TStat's Training account on Zoom, suspects someone else to have accessed TStat's course Training portal through the use of the credentials they themselves have received from TStat S.r.l., or if their link/access credentials have been either lost or stolen.

## 8. Legal Basis for Processing your Personal data (EEA and Switzerland only)

With respect to personal data collected from individuals from the European Economic Area or Switzerland, our legal basis for collecting and using the personal data will depend on the personal data concerned and the specific context in which we collect it. Our Company will normally collect personal data from you only where: (a) we have your consent to do so, (b) where we need the personal data to perform a contract with you (e.g. to deliver the services you have requested), or (c) where the processing is in our or a third party's legitimate interests (and not overridden by your data protection interests or fundamental rights and freedoms).

## 9. Limiting Use, Disclosure, Retention

TStat S.r.l. identifies the purposes for which the information is being collected before or at the time of collection. Your personal data will be processed and stored for as long as required for the purposes for which they were collected, and in accordance with the storage periods provided for by the applicable laws, or until you revoke your consent to the processing, if applicable. Unless you consent or we are required by law, we will only use the personal data for the purposes for which it was collected. If TStat will be processing your personal data for another purpose later on, we will seek your further legal permission or consent; except where the other purpose is compatible with the original purpose. We will keep your personal data only as long as required to serve those purposes. We will also retain and use your personal data for as long as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. After such period, your Personal Data will be automatically and permanently erased or made anonymous.

## 10. International Transfers of your Personal data

Your personal data subject to Processing may be transferred abroad, within and/or outside the European Union, always in compliance with the rights and guarantees provided by the applicable legislation.

In connection with its activity as an international software distributor, TStat S.r.l. may transfer your data outside the EEA, depending on where the headquarters of the software manufacturer we are representing in our contacts with you are located. According to the terms and conditions of use of the parent software company which we represent, software licences are considered nominative, released in the name of the end user, even though ultimate ownership rights always remains with the entity purchasing the licence. For this reason, TStat S.r.l. is obliged to provide the parent company with the following information regarding the licence end user: i) name and address in the case of a acquisition for private use; ii) end user name, organisation and address of the organisation in the case of company or institutional acquisitions. Without this information, the parent company is unfortunately unable to create the required licence.

TStat S.r.l. is an international official software distributor for a number of countries situated both within and outside the European Economic Area. Information collected by our company is stored and processed in the European Economic Area (in electronic form on our Microsoft Italia Cloud Account and were required for administrative or legal purposes) in printed format at our Head Office. It may however, be accessed/transferred or held in any other country in which our Company or agents or contractors maintain facilities. By accessing our sites and using our services, you consent to any such transfer of information outside of your country. Such countries may have laws which are different, and potentially not as protective, as the laws of your own country. Whenever we share personal data originating in the European Economic Area or Switzerland we will rely on lawful measures to transfer that data, such as EU standard contractual clauses. If you reside in the EEA or other regions with laws governing data collection and use, please note that you are agreeing to the transfer (when necessary to conclude any commercial contracts relating to the purchase of our goods and services) of your personal data to the United States or other jurisdictions in which we, or the Software House which we represent, operate. By providing your personal data, you consent to any transfer and processing in accordance with this Policy.

### **11. Accuracy of Personal data**

We do our best to ensure that the personal data we hold and use is accurate. We rely on the customers we do business with to disclose to us all relevant information and to inform us of any changes.

### **12. Your Access to and Updating of your Personal Data**

Reasonable access to your personal data may be provided upon request made to our Company at the contact information provided below. If access cannot be provided within that time frame, our Company will provide the requesting party a date when the information will be provided. If for some reason access is denied, we will provide an explanation as to why access has been denied. We reserve the right to charge a reasonable fee in advance for copying and sending the information requested.

If you would like us to delete any personal data held about you, we will do so on request unless we need to hold the information as part of the provision of products and services to you.

### **13. Marketing Communications**

We offer those who provide personal contact information a means to choose how we use the information provided. You may manage your receipt of marketing and non- transactional communications by clicking on the “unsubscribe” link located on the bottom of our marketing emails.

### **14. Additional Rights (EEA and Switzerland only)**

If you reside in the European Economic Area or Switzerland , You may exercise the additional rights under Articles 15 to 21 GDPR, and specifically the right to request information as to whether your Personal Data is being processed and as to the characteristics of the processing, the right to rectification and erasure of your Personal Data, the right to



object to the processing and/or the right to have those Personal Data transmitted to another controller. More specifically:

- **Right of erasure.** You may have a broader right to erasure of personal data that we hold about you. For example, if it is no longer necessary in relation to the purposes for which it was originally collected. Please note, however, that we may need to retain certain information for record keeping purposes, to complete transactions or to comply with our legal obligations, among other things.
- **Right to object to processing:** You may have the right to request that we stop processing your personal data and/or to stop sending you marketing communications.
- **Right to restrict processing:** You may have the right to request that we restrict processing of your personal data in certain circumstances. For example, where you believe that the personal data we hold about you is inaccurate or unlawfully held.
- **Right to data portability:** In certain circumstances, you may have the right to be provided with your personal data in a structured, machine readable and commonly used format and to request that we transfer the personal data to another data controller without hindrance.
- If you would like to exercise any of the above rights, please contact our support team or contact our Data Protection Officer (see our contact details in Section 15 below). We will consider your request in accordance with applicable laws. To protect your privacy and security, we may take steps to verify your identity before complying with the request.
- You also have the right to complain to a data protection authority about our collection and use of your personal data. For more information, please contact your local data protection authority.

## 15. Children's Privacy

Because of the nature of our business, our services are not designed to appeal to minors. We do not knowingly attempt to solicit or receive any information from anyone under the age of 13. If you are a parent or guardian and you are aware that your child has provided us with personal data, please contact us immediately.

## 16. Legal Basis for Processing your Personal data (EEA and Switzerland only)

With respect to personal data collected from individuals from the European Economic Area or Switzerland, our legal basis for collecting and using the personal data will depend on the personal data concerned and the specific context in which we collect it. Our Company will normally collect personal data from you only where: (a) we have your consent to do so, (b) where we need the personal data to perform a contract with you (e.g. to deliver the services you have requested), or (c) where the processing is in our or a third party's legitimate interests (and not overridden by your data protection interests or fundamental rights and freedoms).

## 17. Changes to our Privacy Policy

Our Company may amend this Privacy Policy at any time by posting a new version. It is your responsibility to review this Privacy Policy periodically as your continued use of this website and our products and services represents your agreement with the then-current Privacy Policy.

## 18. Data Controller/Data Protection Officer

The Data Controller or Data Protection Officer ("DPO") is TStat S.r.l., and can be contacted by writing to TStat S.r.l. via Rettangolo,12/14, 67039 Sulmona (AQ), Italy or by sending an e-mail to [privacy@tstat.it](mailto:privacy@tstat.it) or by PEC at [tstat@tstat.ticertifica.it](mailto:tstat@tstat.ticertifica.it).

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