

**PRIVACY DISCLOSURE PURSUANT TO ART. 13 OF EU REGULATION 2016/679 - WEBSITE USERS**

Title		
<p><b>1. Definitions</b></p>	<p>Applications, Cookies, Personal Data, Events, Disclosure, Cookie Disclosure, Jobs Disclosure, Regulation, Services, Website, Processing, Users.</p>	<p><b>1.1 Job Applications:</b> applications sent by users in response to employment openings published by Simmetrico or spontaneously to offer availability for an interview aimed at establishing a working relationship with Simmetrico.</p> <p><b>1.2 Cookies:</b> cookies are text files (letters and/or numbers) that contain packages of information that are stored on the user's computer or mobile device whenever he/she visits a website through a browser. At each subsequent visit, the browser sends cookies to the website that originated them. Cookies can be stored only for the time of use of a particular website (session cookies), or for a longer period of time independent of the session (persistent cookies).</p> <p><b>1.3 Personal Data:</b> any information relating to a natural person that is directly and indirectly identified or identifiable by reference to a name, identification number, location data, an online identifier or elements characteristic of his/her physical, physiological, genetic, psychic, economic, cultural or social identity.</p> <p><b>1.4 Events:</b> events created and/or managed by Simmetrico on its own behalf or on behalf of its customers.</p> <p><b>1.5 Disclosure:</b> this document, consisting of the disclosure on the processing of Personal Data, the disclosure on Cookies and the Disclosure on Job Applications.</p> <p><b>1.6 Cookie Disclosure:</b> Disclosure relating to Cookies available on the Website;</p> <p><b>1.7 Jobs Disclosure:</b> Disclosure on the processing of personal data collected when job applications are submitted by users through the "Jobs" form on the Website.</p> <p><b>1.8 Profiling:</b> Personal Data Processing through the evaluation of personal aspects of Users with the use of fully or partially automated procedures.</p> <p><b>1.9 Regulation:</b> EU Regulation 2016/679 of 27 April 2016.</p> <p><b>1.10 Services:</b> design, implementation and management of projects in museums, exhibition pavilions and event planning.</p> <p><b>1.11 Website:</b> this Internet site.</p>

		<p><b>1.12 Processing:</b> any operation or set of operations concerning the Personal Data, such as the collection, organization, structuring, preservation, modification, extraction, consultation, use, communication, interconnection, limitation, cancellation and destruction.</p> <p><b>1.13 Users:</b> users of the Website.</p>
<b>2. Data controller</b>	Simmetrico S.r.l.	<p>The Data Controller referred to in this Disclosure is Simmetrico S.r.l., with registered office in Milan (MI), 20144, Via Vincenzo Forcella no. 13, Tax Code/VAT number 05682780969 ("<b>Simmetrico</b>").</p> <p>Any request of Users concerning the processing activities performed by Simmetrico on their Personal Data (including the exercise of the rights referred to in point 7) shall be communicated to Simmetrico by post at its registered office, or by e-mail to <a href="mailto:amministrazione@simmetrico.it">amministrazione@simmetrico.it</a>.</p>
<b>3. Purposes and legal grounds for processing</b>	<p>a) browsing the Website: consent;</p> <p>b) analysis and response to contact requests: legitimate interest of Simmetrico;</p> <p>c) analysis and feedback to Job Applications: consent;</p> <p>d) sending of commercial and promotional communications by Simmetrico: consent</p> <p>e) improvement of the Website: legitimate interest.</p> <p>f) collection of personal images for Events: consent.</p>	<p>Simmetrico collects and uses the Personal Data of Users for the following purposes:</p> <p>a) To allow browsing on the Website, for which the use of Cookies is required.</p> <ul style="list-style-type: none"> <li>➤ The collection of Personal Data for the purposes referred to in letter (a) is governed by the Cookie Disclosure, available at the following <a href="#">link</a> (Simmetrico recommends its reading).</li> </ul> <p>b) Manage contact requests received from the Website through e-mail spontaneously sent by the User to the address provided by Simmetrico for such purpose.</p> <ul style="list-style-type: none"> <li>➤ The collection of Personal Data for the purposes referred to in letter (b) is based on the <u>legitimate interest</u> of Simmetrico, consisting of the benefit that Simmetrico can obtain from the management of contact and/or assistance requests spontaneously sent by Users as regards the Services, which Simmetrico believes to be prevalent with respect to the right to privacy of the Users themselves. <u>Opposition to this processing</u> can be exercised at any time by following the indications in point 7(g) of this Disclosure.</li> </ul> <p>c) With previous optional consent, receipt and reply to the Employment Submissions sent by Users.</p> <ul style="list-style-type: none"> <li>➤ The collection of Personal Data for the purposes referred to in letter (a) is governed by the Jobs Disclosure, available at the following <a href="#">link</a> (Simmetrico recommends its reading).</li> </ul>

		<p>d) With previous optional consent, to perform statistical analysis and market research, send informative and advertising material, report on and send invitations to Events, without any profiling by Simmetrico.</p> <ul style="list-style-type: none"> <li>➤ The collection of Personal Data for the purposes referred to in letter (d) is <u>optional</u>; refusal by the User prevents the latter from receiving newsletters from Simmetrico. This processing activity is based on the free, specific, informed and unequivocal <u>consent</u> of the User, expressed through a declaration or positive action (e.g. flag) on the Website. The <u>withdrawal of consent</u> can be exercised at any time by following the indications in point 7(a) of this Disclosure.</li> </ul> <p>e) Perform statistical analysis on the use of the Website, to improve the Website, without any profiling activity by Simmetrico. Where possible, to achieve this purpose, Simmetrico uses Anonymous Personal Data (Personal Data that does not identify or make Users identifiable).</p> <ul style="list-style-type: none"> <li>➤ The processing activity referred to in letter (e) is based on the <u>legitimate interest</u> of Simmetrico, consisting of the benefit that the Company can obtain from having a Website that facilitates navigation and enhances the User experience, which Simmetrico considers a prevailing right over the right to privacy of Users. <u>Opposition to this processing</u> (if it does not concern anonymous data) can be exercised at any time by following the indications in point 7(g) of this Disclosure.</li> </ul> <p>f) With previous optional consent, the collection of personal images to Events.</p> <ul style="list-style-type: none"> <li>➤ The collection of Personal Data for the purposes referred to in letter (f) is optional; any refusal by the User prevents the latter from being filmed/photographed in the foreground or being recognizable in photographic material or videos of Events organized by Simmetrico. This processing activity is based on the free, specific, informed and unequivocal <u>consent</u> of the User, expressed through a declaration on a specific form that will be provided by Simmetrico to the Event together with any disclosure on additional processing activities with respect to this Disclosure. The <u>withdrawal of consent</u> can be exercised at any time by following the indications in point 7(a) of this Disclosure.</li> </ul>
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<p><b>4. Data collection method</b></p>	<p>a) Personal Data collected automatically by the Website (via Cookies);  b) Personal Data communicated online and offline to Simmetrico by Users;  c) Personal Data collected during the Events.</p>	<p>Simmetrico collects Personal Data in the following ways:</p> <p>a) Personal Data collected automatically by the Website: Personal Data collected automatically by the Website through, but not limited to, Cookies (for further information, Simmetrico recommends reading the Cookie Disclosure);  b) Personal Data spontaneously communicated online and offline to Simmetrico by Users: these are the Personal Data provided by Users such as to send contact requests or Job Applications to Simmetrico by e-mail, or directly communicated to Simmetrico employees and collaborators;  c) Personal Data collected during Events: Personal Data provided by Users during the participation in Events, inclusive of the personal image of the User.</p>
<p><b>5. Potential categories of recipients of Personal Data</b></p>	<p>a) Employees and/or collaborators  b) third-party IT service providers  c) group companies,  d) customers  e) technical and commercial third parties.</p>	<p>Personal Data are processed by Simmetrico and/or third parties selected for their reliability and competence, to which such data may be disclosed as necessary or appropriate, provided that they are within the European Union. Simmetrico informs Users that Personal Data may be processed by and/or communicated to:</p> <p>a) employees and/or collaborators of Simmetrico;  b) third party suppliers of services required to guarantee the functioning of the Website (such as a company that provides hosting services, IT technicians);  third parties who provide services for analyzing the navigation data of the Website;  c) companies of the group of which Simmetrico is a part;  d) Simmetrico customers for whom Simmetrico organizes and manages Events;  e) subject to the optional consent of the User, third parties providing automatic services for sending newsletters and/or any other type of commercial communication, marketing services, promotion, analysis of habits and consumption choices; with previous optional consent by the User, to third parties involved in the organization and management of Events (such as photographers, security services).</p>
<p><b>6. Retention period of Personal Data (or criteria for its determination)</b></p>	<p>a) Cookies: see the Cookie Disclosure;  b) Personal Data collected for contact requests: 3 months from receipt of the request;</p>	<p>Personal Data are kept by Simmetrico for the period of time strictly necessary for the achievement of the purposes for which they were collected, as indicated in point 3 above. Except for exercise of the right to revoke consent as referred to in point 7(a) and the right of opposition referred to in point 7(g), Simmetrico retains Personal Data for the following term:</p>

	<ul style="list-style-type: none"> <li>c) Personal Data collected for Employment Applications: see the Jobs Disclosure;</li> <li>d) Data for commercial purposes: 24 months from the last interaction of the User with the Company.</li> </ul>	<ul style="list-style-type: none"> <li>a) Cookies: for the purposes referred to in point 3(a), we recommend reading the Cookie Disclosure;</li> <li>b) Personal Data spontaneously sent to Simmetrico for contact requests: for the purposes referred to in point 3(b), for a period of 3 months from receipt of the contact request, in order to verify whether the User requires further assistance on the matter in question. By way of derogation from this deadline, if a complaint or claim is sent via the contact form, the Personal Data of the User will be retained for the period referred to in letter (d);</li> <li>c) Personal Data spontaneously sent to Simmetrico for Job Applications: for the purposes referred to in point 3(c), it is recommended to read the Jobs Disclosure;</li> <li>d) Personal Data for commercial communications: for the purposes referred to in point 3(c), for a period of 24 months following the last interaction with Simmetrico by the User that demonstrates interest in receiving communications relating to the Company, such as the collection of consent, participation in Events, or sending contact requests. Simmetrico is authorized to keep Personal Data in whole or in part for a maximum period of 10 years from its collection, limited to the information necessary to comply with legal obligations and allow Simmetrico to investigate, exercise and defend its right in court.</li> </ul> <p>Once these terms have elapsed, Simmetrico will automatically delete the Personal Data collected or provide for their irreversible transformation into an anonymous form.</p>
<p><b>7. Rights of the User</b></p>	<ul style="list-style-type: none"> <li>a) Withdrawal of consent</li> <li>b) access to Personal Data</li> <li>c) correction or integration of Personal Data</li> <li>d) cancellation of Personal Data</li> <li>e) limitation of processing activities,</li> <li>f) portability of Personal Data</li> <li>g) opposition of processing activities</li> </ul>	<p>Pursuant to and for the purposes of the Regulation, for the period referred to in paragraph 6 of this Disclosure, each User has the right to:</p> <ul style="list-style-type: none"> <li>a) with reference to the processing activity referred to in point 3(c), (d), and (f), withdraw consent at any time without prejudice to the lawfulness of the Processing, by sending an e-mail to Simmetrico and exercising the opt out option (see Article 7 of the Regulation);</li> <li>b) ask Simmetrico to access the Personal Data and related processing information and any copy in electronic format, unless specifically requested otherwise by Users (see Article 15 of the Regulation);</li> </ul>

	<ul style="list-style-type: none"> <li>h) <i>data breach</i></li> <li>i) complaint to the competent authorities</li> </ul>	<ul style="list-style-type: none"> <li>c) request the rectification and/or integration of Personal Data without undue delay (see Article 16 of the Regulation);</li> <li>d) Request the cancellation of Personal Data for specific reasons (such as unlawful processing, withdrawal of consent, non-existence of the processing purpose), without unjustified delay (see Article 17 of the Regulation);</li> <li>e) Request the limitation of processing in using specific assumptions (such as the inaccuracy of personal data, unlawful processing, exercise of a right in court) (Article 18 of the Regulation);</li> <li>f) receive the Personal Data relating to him/her in a structured, common and readable format, and consequently exercise the right of portability and send such data to another data controller (Article 19 of the Regulations);</li> <li>g) with reference to the processing activities referred to in point 3(b), (d) (if it does not concern anonymous data) and (e), to object to the processing of personal data at any time by sending an e-mail to Simmetrico (see Article 21 of the Regulation);</li> <li>h) be informed by Simmetrico without unjustified delay of any violations or unauthorized access by third parties to their systems containing the Personal Data (data breach - Article 34 of the Regulation);</li> <li>i) file a complaint with the supervisory authority of the EU country in which he/she resides, works or in which the violation of rights is believed to have occurred (see Article 77 of the Regulation);</li> </ul> <p>For further information on the terms and conditions for exercising the rights granted to Users, the latter may consult the text of the EU Regulation published at the following <a href="#">link</a> or contact Simmetrico in the forms provided for in point 2 of this Disclosure.</p>
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