

Privacy Policy

The information contained in this policy statement is provided in accordance with Article 13 of EU Regulation 2016/679 on the “Protection of natural persons with regard to the processing of Personal Data” (hereinafter the “EU Reg.”) and according to applicable national legislation.

This data processing declaration applies to all services offered to our customers. This applies regardless of the platform where we offer the service: website, email, telephone, social network, or any other form of communication or transmission.

The website <https://www.revoinsurance.com> (the “Website”) owned by REVO Insurance S.p.A. and any services offered through the Website are reserved for individuals who are 18 years of age or older. The Data Controller does not knowingly process Personal Data relating to individuals through this Website, as it has a general audience. At the request of such Data Subjects, the Data Controller will promptly delete all Personal Data unintentionally collected.

1 - Data Controller and Data Protection Officer

1.1 The data controller (the “Data Controller” or “Company”) is REVO Insurance S.p.A., having its registered office at Viale dell’Agricoltura 7, 37135, Verona.

2 - Type of Personal Data collected

2.1 Personal details. The Personal Data collected by the Data Controller are provided voluntarily by the Data Subject and include but are not limited to: first name, surname, email, telephone number and date of birth.

Personal Data provided through the spontaneous submission of CVs will only be used to assess compatibility with any open positions. CVs are stored for a maximum period of 12 months.

2.2 Browsing data. The computer systems and software procedures operating this Website acquire, in the course of their normal operation, some Personal Data whose transmission is implicit in the use of internet communication protocols.

This category of data includes, for example, the IP addresses or domain names of computers used by users connecting to the site, the time of request, the file size obtained in response and other parameters related to the user’s operating system and computer environment.

This data is used for the sole purpose of obtaining anonymous statistical information on the use of the site and checking that it is functioning properly. The data could be used to ascertain liability in case of hypothetical computer crimes.

2.3 Data provided voluntarily by the user. The sending of emails to the addresses indicated on the Website entails the subsequent collecting of certain Personal Data, including email addresses, necessary to respond to requests.

The Personal Data of the Data Subjects collected in the manner described above or through electronic forms requesting particular services on the Website, are used exclusively to meet and/or respond to requests; such data are kept for the time strictly necessary to fulfil the requests or established by law.

3 - Type of transfer of the Personal Data collected, purpose and legal basis of processing

3.1 The following Personal Data may be collected on this website for purposes pursued by the Data Controller as indicated below:

a) managing staff selection (employees/intermediaries): For more information, please see the policy statement in the corresponding section of the Website.

LEGAL BASIS: The legal basis of the processing of data for the purposes indicated in this point is the performance of pre-contractual measures adopted at the request of the Data Subject, pursuant to Article 6, paragraph 1, subparagraph b) of the EU Reg. (assessment of the professional profile and selection of staff) or in the fulfilment of

legal obligations in accordance with the provisions of Article 6, paragraph 1, subparagraph c) and Article 9, paragraph 2, subparagraph b) of the EU Reg.;

b) requesting information and/or assistance using dedicated telephone numbers or email addresses: Data strictly necessary to identify the person requesting information and/or assistance to provide the requested service will be requested.

LEGAL BASIS: The legal basis of the processing of data for the purposes indicated in this point is the performance of the contract or pre-contractual measures at the request of the Data Subject, pursuant to Article 6, para. 1, subparagraph b) of the EU Reg.;

c) interacting with external social networks and platforms: The Website allows access to the Data Controller's LinkedIn, Facebook, Instagram and YouTube pages. For these pages, see the privacy policies of LinkedIn, Facebook, Instagram and YouTube.

d) fulfilling the obligations established by law, by a regulation, by EU legislation or by an order from an Authority.

Data strictly necessary to fulfil the requested obligation will be requested.

LEGAL BASIS: The legal basis of the processing of data for the purposes indicated in this point is the fulfilment of legal obligations in accordance with the provisions of Article 6, paragraph 1, subparagraph c) and Article 9, paragraph 2, subparagraph b) of the EU Reg.;

e) browsing on the Website: With regard to the data processed by the Data Controller during browsing of the Website, please read the cookie policy detailing what cookies are, i.e. text files created to improve the browsing experience of users through which Personal Data is collected and the types of such data.

3.2 The provision of the Personal Data referred to in the previous points is optional or necessary depending on the specific purpose for which the data are processed.

3.3 If special data processing is essential for the performance of the relationship or for the performance of specific services and legal obligations, the provision of such data will be mandatory and since their processing is only permitted with the prior written consent of the Data Subject (pursuant to Articles 9 and 10 of the GDPR), you must also consent to their processing.

3.4 The processing of Personal Data is intended for the performance of insurance activities for which the Data Controller is authorised pursuant to applicable legislation.

4 - Processing methods

4.1 In the context of the purposes indicated and in accordance with the principles of lawfulness, propriety, transparency, accuracy, relevance and proportionality, Personal Data will be processed in paper form and by electronic means, in compliance with legislative provisions on the processing of Personal Data, adopting adequate security measures.

4.2 The processing of Personal Data will be managed by authorised staff, specially trained and instructed, specifically to ensure its adequate security and confidentiality, as well as to avoid the risk of loss and/or destruction and access by unauthorised persons.

4.3 The processing of Personal Data may consist of any operation or set of operations among those indicated in Article 4, paragraph 1, point 2 of the GDPR.

4.4 Personal Data, for the purposes of proper management of the relationship and fulfilment of the legal obligations, may be included in the Data Controller's own internal documentation and, if necessary, in the records and registers required by law.

5 - Storage of Personal Data

5.1 Personal Data will be stored only for the period strictly necessary to complete the activity/purpose described above and, subsequently, for the time that the Company is subject to storage obligations for tax or other purposes, provided by law or regulations and maintained until the prescribed terms are fulfilled.

5.2 In particular, Personal Data are stored for different periods of time depending on the purposes for which they are processed, in accordance with the legislation applicable from time to time, and may be divided as follows:

- to manage staff selection, they are stored for a maximum of 48 months from the date of collection of the data;
- to provide the information and/or assistance requested, the data are kept for as long as necessary to provide the response;
- to fulfil the obligations provided for by law, by a regulation, by EU regulations or by an order from an Authority, they are stored for the time provided for by law, by a regulation, by EU regulations or by an order from an Authority.

5.3 In any case, the Personal Data described above may be stored due to the need to protect the rights of the Data Controller in all administrative, civil, criminal and extrajudicial proceedings.

6 - Disclosure of Personal Data

6.1 Personal Data may be disclosed to the following persons who, on the basis of the various roles and services offered, may be appointed as external data processors:

- staff employed by the Data Controller and associated companies, after appointment as authorised persons;
- third parties (e.g. parties that provide services for the management of the information system and telecommunications networks, including email, newsletters and website management, call centres, companies specialising in outsourcing services in the social security insurance sectors, companies specialising in claims management and settlement and insurance brokers;
- self-employed persons, firms or companies in assistance and advisory relationships;
- authorities competent for the fulfilment of obligations of laws and/or provisions of public bodies, etc.);
- employees, contractors and temporary staff of the Data Controller, in their capacity as persons in charge of processing and/or internal data processors and/or system administrators, or the DPO if appointed;
- third-party companies or other parties not mentioned above (for example, credit institutions, professional firms, consultants, insurance companies for the provision of insurance services, factoring, leasing, etc.) that provide services functional to the purposes, which – if the legal conditions exist – will act as external data processors;
- third-party companies whose services the Data Controller uses to send commercial communications.

6.2 Third parties to whom your Personal Data may be disclosed act as: 1) Data Controllers, i.e. parties that determine the purposes and means of processing Personal Data; 2) Data Processors, i.e. parties that process Personal Data on behalf of the Data Controller; or 3) Joint Data Controllers, which jointly determine the purposes and means at the Company.

7 - Dissemination of Personal Data

We also advise that Personal Data will not be disseminated and will not be disclosed without explicit consent, nor to any fully automated decision-making process, except for necessary disclosures that may involve the transfer of data to public bodies, consultants or other entities for the fulfilment of legal obligations. In particular, Personal Data may be disclosed to:

- a) Public entities or offices or supervisory authorities under legal and/or contractual obligations;
- b) Banks and/or credit institutions for the management of payments arising from the contractual relationship.

8 - Transfer of Personal Data

Where necessary, Personal Data may be transferred by the Company to third countries outside the European Economic Area.

In such cases, the transfer will take place in accordance with the conditions set out in articles 44 *et seq.* of the EU Reg., i.e. with regard to countries for which there are “adequacy” decisions by the European Commission, on the

basis of Standard Clauses approved by the European Commission, or in application of specific exceptions provided for in the EU Reg.

More information can be requested on the data transfers made and the guarantees adopted for this purpose, by sending an email to the Data Protection Officer or to the Data Controller.

9 - Security measures

9.1 The Data Controller takes appropriate security measures to minimise the risks of destruction or loss, including accidental destruction, of Personal Data, of unauthorised access or processing, or processing that does not comply with the purposes of collection indicated in this Privacy Policy.

9.2 With regard to the optimum protection of Personal Data regardless of the control and management of the Data Controller, we recommend ensuring that the computer used is equipped with appropriate software devices for the protection of the transmission of data on the network, both incoming and outgoing (such as updated anti-virus systems) and that the chosen internet service provider has taken appropriate measures for the security of the transmission of data on the network (such as firewalls and anti-spam filters).

10 - Rights of the Data Subject

The rights that may be exercised include:

- requesting access to your Personal Data and information relating thereto; rectification of inaccurate data or completion of incomplete data; and erasure of your Personal Data (if any of the conditions set out in Article 17, paragraph 1 of the EU Reg. are met and in accordance with the exceptions provided for in paragraph 3 of the same article); the restriction of the processing of your Personal Data (in the event of one of the cases indicated in Article 18, paragraph 1 of the EU Reg.);
- requesting and obtaining – if the legal basis for processing is the contract or consent, and is carried out by automated means – your Personal Data in a structured and machine-readable format, including for the purpose of disclosing this data to another data controller (the right to Personal Data portability);
- objecting at any time to the processing of your Personal Data in specific situations concerning you;
- withdrawing consent at any time, limited to cases where the processing is based on your consent for one or more specific purposes concerning common Personal Data (e.g. date and place of birth or place of residence), or particular categories of data (e.g. data revealing your racial origin, political opinions, religious beliefs, health or sex life). Processing based on consent and carried out prior to withdrawal of consent nevertheless remains lawful;
- lodging a complaint with a supervisory authority (Italian Data Protection Authority – www.garanteprivacy.it).

11 - Exercising rights

Data Subjects may contact the Data Controller by one of the following methods:

- Registered letter (Viale dell'Agricoltura 7, 37135 Verona)
- Certified electronic mail (revo@pec.revoinsurance.com)

This Privacy Policy, in order to continuously improve the safeguarding of your Personal Data, may be amended over time – including in connection any entry into force of new industry regulations or the updating or provision of new services or technological innovations – for which the Data Subject is invited to consult this page periodically.