

# Synesthesia Srl Società Benefit

Corso Dante, 118  
10126 Torino (TO)  
P.IVA 10502360018  
PEC: amministrazione@pec.synesthesia.it



## Privacy Policy concerning the processing of personal data pursuant to articles 13-14 of (EU) Regulation 2016/679

### Data subject: employees and para-subordinate staff.

Synesthesia Srl Società Benefit in its capacity of Data Controller with regard to the processing of your personal data pursuant to (EU) Reg. 2016/679 (hereinafter the 'GDPR'), hereby informs you that the said regulation protects data subjects with regard to the processing of their personal data and that the said processing will take place in a fair, lawful, transparent manner which protects your privacy and your rights.

Your personal data will be processed in accordance with the terms of the above legal provisions and the confidentiality obligations contained therein.

In addition, the Data Controller may obtain knowledge of special categories of data, as follows: Fitness, Internet access log files, unions enrollment, Monitoring data on business systems, racial or ethnic origins, religious beliefs. Personal data in these special categories are processed in compliance with art. 9 of the GDPR.

Purposes and legal basis of processing: specifically, your data will be processed for the following purposes, relating to the fulfilment of legal obligations:

- legal compliance with regard to taxation and accounting;
- Obligations relating to liquidation of unions enrollment or exercise of rights;
- Hygiene and labour safety.

Your data will also be processed for the following purposes relative to the performance of measures connected to contractual or preliminary obligations:

- Dissemination of pictures and videos for marketing and communication purposes;
- Internal control services;
- legal and economic terms of employment;
- HR management in general;
- Activities schedule.

Your data will also be processed for the following purposes necessary to safeguard the vital interests of the data subject or another natural person:

- Measures in case of disasters, epidemics of infectious diseases.

Processing procedures. Your personal data may be processed by the following ways:

- Manual personal data processing with paper filing system;
- contract data processing by third parties;
- computer processing.

All data are processed in compliance with the procedures specified in articles 6 and 32 of the GDPR and with the adoption of the appropriate security measures required.

Your data will only be processed by persons specifically authorised by the Data Controller, and specifically by the following categories of authorized persons:

- Administration office;
- in the context of HR management;
- staff managers.

Disclosure. Your data may be disclosed to external entities for the correct management of the relationship and specifically for the following categories of Recipients, including all the duly designated Data Processors:

- ;
- constitutional authorities;
- banks and lenders;
- consultant and freelance professionals, also working as firms;
- Google Ireland Limited through G Suite, their on cloud productivity tools suite;
- pension and welfare institutions;
- Paprika Software S.r.l. through Paprika, their on cloud project management platform;
- insurance companies;
- sub-contractors;
- trade unions.

Dissemination. Data may be disseminated through:

- digital channels for business promotion purposes.

Subject to the absolute ban of the dissemination of data which may reveal your state of health.

Your personal data may also be transferred, only for the aforesaid purposes, to the following countries:

- EU countries;
- United States.

Data Storage Period. In accordance with the principles of lawfulness, limitation of purpose and minimisation of data, pursuant to art. 5 of the GDPR, the data storage period for your personal data is:

- set for a timing not larger than the one which implies its purpose achievement, given the aim to collect data, and collected and processed for the execution and fulfillment of contract purposes;
- set for a timing not larger than the supplied services fulfillment;
- established as a period of time not exceeding the purposes for which the data were collected and processed and complying with the compulsory times required by law.

Data Controller: the Data Controller, as defined by the Law, is Synesthesia Srl Società Benefit (Corso Dante, 118 , 10126 Torino (TO), VAT no. 10502360018, contactable as follows: e-mail [info@synesthesia.it](mailto:info@synesthesia.it)) in the person of Francesco Ronchi.

The Data Protection Officer (DPO) designated by the Data Controller pursuant to art. 37 of the GDPR is:

- Smart Flow (Corso Giuseppe Siccadi, 11 bis , 10122 Torino (TO), VAT no. 11592420019, contactable as follows: e-mail [dpo@smart-flow.it](mailto:dpo@smart-flow.it)).

You are entitled, by application to the Data Processor, to obtain the erasure (right to be forgotten), restriction, updating, rectification and portability of your personal data, to object to their processing, and in general to exercise all your rights under articles 15, 16, 17, 18, 19, 20, 21 and 22 of the GDPR.

You may also examine whenever you like the updated version of the present report by connecting to the following web site <https://www.privacylab.it/informativa.php?18809416566&lang=en>.

## Regulation (EU) 2016/679: Articles 15, 16, 17, 18, 19, 20, 21, 22 - Rights of the Data Subject

1. The data subject has the right to obtain confirmation as to whether or not personal data concerning him or her exist, regardless of their being already recorded, and disclosure of such data in intelligible form, and the right to lodge a complaint with the supervisory authority.

2. The data subject has the right to be informed of:

- a. the source of the personal data;
- b. the purposes and methods of processing;
- c. the logic applied if the data are processed by electronic devices;
- d. the identification data concerning the Data Controller, the Data Processors and the representative designated as per article 5, comma 2;
- e. the entities or categories of entity to whom or which the personal data may be disclosed and who or which may get to know said data as designated representative in the State's territory, as data processors or as persons in charge of the processing.

3. The data subject is entitled to obtain:

- a. the updating, rectification or, where interested therein, integration of the data;
- b. the erasure, anonymisation or blocking of data that have been unlawfully processed, including data whose retention is not necessary for the purposes for which they were collected or subsequently processed;
- c. certification to the effect that the operations as per letters a) and b) have been notified, as also related to their contents, to the entities to whom or which the data were disclosed or disseminated, unless this requirement proves impossible or involves a manifestly disproportionate effort compared to the right that is to be protected;
- d. the portability of the data.

4. The data subject has the right to object, in whole or in part:

- a. on legitimate grounds, to the processing of personal data concerning him/her, even though they are relevant to the purpose of the collection;
- b. to the processing of personal data concerning him/her, where it is carried out for the purpose of sending advertising materials or direct selling or else for the performance of market or commercial communication surveys.

# Synesthesia Srl Società Benefit

Corso Dante, 118  
10126 Torino (TO)  
P.IVA 10502360018  
PEC: amministrazione@pec.synesthesia.it



## Data subject consent form

Data : ..... Place : .....

Name, Surname: .....

Do you consent to the dissemination of your personal data?

☐ YES   ☐ NO   digital channels for business promotion purposes

Data subject:

\_\_\_\_\_