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Privacy Policy Disclaimer

THE MEANING OF THIS PRIVACY POLICY

In the following privacy policy Centrally (hereinafter the "Firm") intends to describe the working of this website, with specific regard to the modalities whereby personal data pertaining to the users who visit it are gathered, registered and used, as well as the purposes of such processing: this notice has been issued for the website www.centrally.io, (hereinafter "Centrally website") only and is not meant to be applied to the other websites possibly visited by the user through the links on the pages of the aforementioned websites.

Centrally website is run and controlled Centrally, the "Data Controller", whose seat is in Via Roma no.9, 16121 Genoa, Italy. This privacy policy, addressed to anyone who enjoys Centrally's web services, intends to satisfy the requirements provided for by art. 13 of Legislative Decree no. 196/2003 – Personal Data Protection Code – and it also draws inspiration from Recommendation no. 2/2001, adopted on May 17, 2001 by the EU authorities for the personal data protection, that are all part of the Group created pursuant to art. 29 of Directive no. 95/46/EC. This Recommendation identifies some basic requirements for the on-line collection of personal data; in particular, the nature of the information, as well as the timing and modalities of their provision, to be supplied by the holder of processing to the users whenever the latter visit some web pages, no matter what the reasons of their connection are.

PLACE OF DATA PROCESSING

The website is hosted on machines managed by HEBERGEMENT OVH INC Corporation, an external company located in 1801 McGill College Ave. Suite 800 Montreal, Quebec H3A 2N4 Canada. However, communications are transferred to Centrally in order to reply to the users' requests.

TYPE OF DATA PROCESSED

Navigation data The IT systems and the software procedures for the operation of this website, while being normally used, collect some personal data whose transmission is implicit while using the Internet communication protocols. The above information is not collected to be associated to any identified persons; yet, its same nature could make it possible to identify users, by means of special processing and associations with other data. The IP addresses or the domain names through which the users connect to the website, the URI (Uniform Resource Identifier) addresses of the resources requested, the time of request, the procedures used to submit the request to server, the file size of the reply, the numeric code indicating the status of the server's reply (successfully delivered, error and so on) and other parameters relating to the user's operating system or IT environment, fall within this category of data.

Data voluntarily provided by the user The optional, explicit and voluntary sending of electronic mail messages to the addresses indicated on this website for the sending of the CVs implies the following collection of the sender's address, necessary to reply to possible requests, as well as of the other personal data, if any, included in the message.

Specifically, the users that wish to send their CVs through Centrally's website are invited to pay the due attention to this notice with regard to the processing of data related to them and inserted in the CVs sent. In this way only the processing

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can be carried out consciously and deliberately. In particular, Centrally acquaints that the Privacy Code prescribes that sensible data (i.e. personal data allowing the disclosure of racial or ethnic origin, religious, philosophical or other beliefs, political opinions, membership of parties, trade unions, associations or organizations of a religious, philosophical, political or tradeunionist character, as well as personal data disclosing health and sex life) can be lawfully processed only by previous consent in writing; it is currently difficult, thought, to obtain such a consent from each user, except by specific modalities (e.g. digital signature). Thus, the Firm's intention being a legitimate and transparent processing, the same invites those being interested in the on-line sending of the CVs not to include any sensible data in it. The consent to the possible transfer abroad of the data contained in the CV will be requested upon the conoscitive and informative interview. In response to the ex-associates' requests, Centrally has created a special network, the so called Network of Centrally's Alumni (hereinafter "NCA"), an initiative addressed to all those who took part in the Firm and wish to keep in touch with their ex-colleagues and the Firm's activities. In order to participate in this initiative it is necessary to be registered in NCA, by sending an e-mail to the address indicated in the special webpage, with the inclusion of the phone numbers and the address whereon the user prefers to be contacted (eg. phone number, fax, mobile number etc.). In order to complete the registration, the user will be called on the phone number indicated in the e-mail and upon that occasion he/she will have the opportunity to consent to the processing of his/her personal data for the purposes and with the modalities as indicated in this privacy policy. In any case, if necessary, specific synthetic information reports and special consent forms will be displayed from time to time in the website pages created for special services on request.

PURPOSES OF DATA PROCESSING AND COMMUNICATION

Navigation data are merely used to obtain anonymous statistical information on the use of website and to verify its proper operation, thus, it will be deleted immediately after processing. The data may be used to ascertain any liability in case of possible IT-related offences to the prejudice of the website: except this circumstance, the data about web contacts will not be currently held for more than seven days.

Personal data provided by users sending their CVs, requesting to be sent information on Centrally's events and initiatives, wishing to register themselves in NCA or deciding to enjoy Centrally's services will be only used to reply to and satisfy the request and will be communicated to any third parties only in the event that it is required for that purpose. Specifically, personal data furnished by those who decide to register in the Network of Centrally's Alumni shall be used, with automated modalities also, to process the registration and to advertise and keep them posted on activities and projects the Firm undertakes. Processing connected to web services provided by this website are run by Centrally's operators, who were appointed as "People in charge of processing" as well as by external subjects in their quality as "Data Processors" or as "Data Controllers" with regard to the specific activities carried out by them. The distinct role the Firm's partners take in relation to the data processing given to them is strictly connected to the specific activity performed. Personal data can be transferred abroad, as far as the above mentioned purposes are concerned, to other Centrally's seats or to professional partners. In that case, the user will have the opportunity to express his/her preference in relation to such transfer of his/her data.

COOKIES

No personal data of users is intentionally acquired by the website. Neither cookies nor the so-called persistent cookies of any kind or any users' tracking systems will be used for the transmission of personal information. The use of the so-called session cookies (that are only temporarily recorded on the user's computer and that are deleted as soon as the browser is closed) is strictly limited to the transmission of session IDs (made up of random numbers generated by the server) necessary to perform a safe and efficient exploration of the site. The so-called session cookies used in this site

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avoid any recourse to other IT techniques that are potentially prejudicial to the privacy of the users' navigation and do not allow the collection of personal data which may identify users.

VOLUNTARY PROVISION OF DATA

Except as specified for navigation data, the user is free to provide his/her personal data by email to urge information, to submit an application to Centrally by sending his/her CV or to join Centrally's initiatives. However, any refusal by the user to provide the above data may impair, in such situations, the obtainment, by the user themselves, of the information requested.

PROCESSING METHODS

Personal data is processed with IT tools exclusively for Specific security measures have been adopted to prevent any loss of data, any unlawful or non correct use of the same and unauthorised access. No data deriving from the web service shall be disseminated.

RIGHTS OF THE DATA SUBJECTS

The data subjects are entitled at any time to have confirmation of the existence of such data and to be acquainted with its contents, to verify its source and accuracy and to require its integration, updating or correction (art. 7 of Legislative Decree no. 196/2003). In compliance with the above mentioned article, any subject is entitled to request that his/her data processed in infringement of the law are deleted, turned into anonymous or blocked, as well as to object anyway, for lawful reasons, to its processing. Requests can be sent to the e-mail address: privacy@centrally.io.