



Information Notice pursuant to Article 13 of EU Regulation 2016/679

This information notice is provided pursuant to Article 13 of EU Regulation 2016/679 concerning the protection of natural persons with regard to the processing of personal data, as well as the free movement of such data (hereinafter referred to as the "**Regulation**" or "**GDPR**"), and the current privacy regulations in force.

We hereby inform you that the data in the possession of **Bitrock S.r.l.**, in its capacity as Data Controller (hereinafter referred to as the "**Controller**"), will be processed in compliance with the principles outlined in Article 5 of the Regulation and ensuring the lawfulness of the processing in accordance with Article 6 of the same Regulation.

In relation to the above, we inform you of the following:

1. Identity and Contact Details of the Data Controller

The Data Controller is Bitrock S.r.l., with registered and operational office at Via Tortona 4, Milan (MI), VAT number 10150530961, and can be contacted at the email address **admin@bitrock.it**.

2. Purpose and Legal Basis of the Processing

The processing of personal data relating to employees, in addition to the purposes provided for by laws, regulations, or European standards, is aimed at:

Employees		
Processing Name	Purposes	Legal Basis
Establishment and execution of the employment relationship	Establishment and execution of the employment relationship, including the implementation of obligations provided by collective agreements and regulations for the protection of workers	Execution of pre-contractual and contractual measures
Keeping accounting records and managing tax data	Keeping of accounting records, management of tax and social security data, management of relationships with social security and welfare institutions, financial administration, and credit institutions for the payment of salaries, as well as fulfillment of any legal obligations related to the payment of wages and benefits	Execution of obligations arising from a contract and legal obligations
Compliance with current regulations	Compliance with current regulations regarding workplace safety, training, and health surveillance, as well as fulfillment of obligations related to the regular management of the employment relationship	Execution of obligations arising from a contract and legal obligations

BITROCK S.r.l.

Milano: Via Tortona, 4 - 20144 - Milano - Phone: +39 02 37920598

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info@bitrock.it - bitrock@pec.it - www.bitrock.it

Cap.Soc:400.000 € i.v.

C.F./P.I.: 10150530961



Il trattamento dei dati personali relativi ai **collaboratori esterni**, oltre che per le finalità previste da leggi, regolamenti o norme europee, è finalizzato a:

Collaborators		
Processing name	Purposes	Legal Basis
Establishment and execution of the collaboration relationship	Establishment and execution of the collaboration agreement	Execution of pre-contractual measures
Accounting and administrative purposes	Accounting and administrative purposes related to compensation and fulfillment of any legal obligations connected to the services performed for the Controller	Execution of obligations arising from a contract
Fulfillment of insurance contract obligations	Fulfillment of obligations arising from insurance contracts for coverage of risks and damages caused to third parties in the course of professional activities carried out within the organization	Legitimate interest of the Controller

3. Categories of Personal Data Processed

The data processed are personal, identifying, or otherwise necessary for the establishment of the employment and/or collaboration relationship and for the execution of the related contract (e.g., name, surname, tax code, data necessary for invoicing or payment of compensation, information for payroll processing, etc.).

4. Scope of Communication of Personal Data

The personal data collected may be processed not only directly by the Data Controller but also by authorized personnel.

Personal data may also be disclosed to external parties outside the Data Controller, who are entitled or authorized to access them under legal provisions, or who are bound to the Data Controller by specific relationships, including contractual ones, such as:

- **External Data Processors** formally appointed by the Data Controller for purposes related to the management of employment obligations (e.g., workplace safety, training, health surveillance, etc.);
- **Labor consultants or accountants** for external consultancy activities;
- **Insurance companies** for managing insurance policies;
- **Professionals or external consultants** for activities related to the management of work performance;
- **Public entities** (INPS, INAIL, IRL, Revenue Agency, etc.), private welfare and assistance funds, supplementary funds, credit institutions.

Personal data will not be disseminated unless expressly consented to in advance by the data subject.

5. Methods of Data Processing

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The processing of Personal Data will be carried out using manual, computer, or telematic tools suitable for ensuring their security and confidentiality and will be performed by personnel duly trained to comply with the Applicable Regulations.

We also inform you that your Personal Data will be processed in compliance with the methods specified by the Regulation, which include, among other things, that the data:

- are processed lawfully and fairly;
- are collected and recorded for specific, explicit, and legitimate purposes;
- are accurate and, where necessary, kept up to date;
- are relevant, complete, and not excessive in relation to the purposes of the processing;
- are stored in a form that allows the identification of the data subject for no longer than is necessary for the purposes for which they are collected or subsequently processed;
- are processed according to uniform procedures established by a single supervisory authority (“Lead Authority”), identified with reference to the State where the Data Controller has its main establishment.

Furthermore, the Data Controller's business processes ensure the confidentiality and security of the information and its storage in compliance with legislative requirements and the necessary security measures.

6. Data Retention Period (Determination Criteria)

Personal data will be retained for the entire duration of the employment relationship. The maximum retention period is therefore 10 years following the termination of the relationship. This time limit represents the necessary retention period, unless different limits are imposed by the currently applicable legislation.

Even in cases where computers are used, appropriate protection measures are adopted to ensure the proper storage and use of data, including by the company's collaborators, in compliance with professional confidentiality. These precautions also apply to professionals and entities that may become aware of the data as a result of the activities carried out by the company.

7. Rights of the Data Subject

We inform you that, in accordance with the current regulations (Articles 15-22 of the GDPR, as well as the amendments introduced in the Privacy Code pursuant to Articles 2-undecies and 2-duodecies), you are entitled to the following rights:

- To request access to your personal data from the Data Controller, as per Article 15 of the GDPR;
- To request the rectification of your data, as per Article 16 of the GDPR;
- To request the updating and deletion of your data if they are incomplete, incorrect, or unlawfully collected (right to be forgotten), as per Article 17 of the GDPR;
- To request the restriction of processing to part of the information concerning you, as per Article 18 of the GDPR;
- To object to the processing of your data for legitimate reasons (even partially), as per Article 21 of the GDPR;
- To withdraw consent at any time without affecting the lawfulness of processing based on consent given prior to its withdrawal, as per Article 7, paragraph 3 of the GDPR.

To exercise your rights, you may contact the Data Controller using the contact details provided above.

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We also remind you that if the response to your requests is deemed unsatisfactory, you have the right to contact and lodge a complaint with the **Data Protection Authority** (www.garanteprivacy.it) in accordance with the procedures set out in the applicable regulations.

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The information contained in this document is considered public.