

## Privacy policy in accordance with Regulation (EU) no. 2016/679 (GDPR) on the Protection of Personal Data

Dear user,

in order to use the services provided by In.Te.S.A. S.p.A. (hereinafter, "INTESA") in its capacity as Qualified Trust Service Provider (QTSP), and more specifically as provider of the Qualified Electronic Signature, Qualified Electronic Seal and Qualified Time Stamp services, you will be asked to send INTESA some of your identification data, which constitute personal data under the European General Data Protection Regulation ("GDPR" - Regulation (EU) no. 2016/679) and in relation to which you are the Data Subject, in accordance with the aforementioned Regulation.

Below is our privacy policy concerning the personal data processing performed by INTESA in its capacity as Data Controller.

The data may be freely provided by you or collected automatically by INTESA during the identification process. The data held by INTESA, obtained in relation to the contractual relationship concerning the services received by you, are collected and processed in accordance with the regulations in force.

### 1. Types of Personal Data Processed by INTESA

**1.1** The types of personal data collected by INTESA (hereinafter "Personal Data"), to enable you to sign up for the services are the following:

- name and surname;
- date of birth;
- municipality and state of birth;
- tax code;
- sex;
- details of ID document presented;
- mobile phone number;
- e-mail address.

Optionally, information may be collected concerning:

- any inclusion on a nationally recognised register;
- representative powers in relation to the organisation of which you are a member.

**1.2** Where recognition is carried out by means of video identification or selfie, INTESA will also process special categories of data:

- detection of biometric facial features;
- physical, physiological or behavioural characteristics collected through video recognition or selfie.

### 2. Source of Personal Data

The Personal Data are provided by you during the identification process, by entering your personal data in the sign-up form or using one of the other sign-up methods offered by INTESA and chosen by the customer, which are described in the Operating Manual.

### 3. Purposes of processing and legal basis

The sole purpose of collecting, or processing, the Personal Data, is to properly comply with obligations concerning performance of the activities of Qualified Trust Service Provider, and in particular:

- verifying the identity provided for the purposes of implementing anti-counterfeiting measures;
- issuing the qualified electronic signature or electronic seal certificate;
- any communications that may be useful for the purposes of properly performing the role of Trust Service Provider;



#### In.Te.S.A. - Iniziative Telematiche per i Servizi Applicativi S.p.A.

A single-member company subject to the management and coordination of Kyndryl Italia S.p.A.  
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- managing any complaints and/or disputes;
- preventing/combatting fraud and any other unlawful activities;
- complying with obligations provided for by law, regulations or Community legislation regarding provision of trust services.

The legal basis for the processing of the personal data is:

- a. execution of the contract, as such data are essential for the execution of the same;
- b. compliance with legal obligations in accordance with Italian Legislative Decree 82/2005 ("Digital Administration Code" or "CAD") and Regulation (EU) 910/2014 ("Electronic IDentification Authentication and Signature Regulation" or "eIDAS Regulation");
- c. the direct and explicit consent of the data subject for the sole processing of a special categories of data referred to in art. 1.2 concerning the processing of biometric data in the event of identification by means of video recognition or video selfie.

The data subject has read this privacy policy in the knowledge that the purposes referred to in points a) and b) do not require consent in compliance with Art. 6 co. 1 of the GDPR, letters b) and c) respectively.

#### **4. Processing and storage of Personal Data**

Without prejudice to the fact that the Personal Data processed will be strictly relevant, complete and not excessive in relation to the purposes pursued and set out in art. 3 above, such data will be processed in full compliance with the security measures appropriately established in accordance with the GDPR, in order to minimise the risks of destruction/loss, unauthorised access or processing that does not comply with the purposes for which the data were collected.

The data acquired in the recognition phases could potentially be used to train the artificial intelligence models underlying the recognition procedures in order to improve the services used and requested in the platform.

The data are processed using manual and electronic tools. Processing of the personal data (e.g. collection, recording, organisation, storage, consultation, processing, alteration, selection, retrieval, alignment, use, combination, restriction, disclosure, erasure) occurs both manually and electronically, and such data are stored both in physical files (in the case of application forms received physically) and in the electronic database established to that end to comply with the obligations and purposes set out above.

Such data are stored in physical files (in the case of forms received physically) or in digital format, for a period of 20 years from the date of issuance of the signature certificate, in accordance with the provisions of Art. 32, par. 3, lett. j) of Italian Legislative Decree 82/2005 (CAD) as amended and supplemented.

The Personal Data processed will be strictly relevant and complete and will not be excessive in relation to the purposes pursued.

#### **5. Data Controller and any Data Processors**

In.Te.S.A. S.p.A., with registered office at Strada Pianezza, 289 - 10151 Turin (TO), VAT no. and Tax Code: 05262890014, is the sole Data Controller.

All natural persons appointed to perform the processing operate in compliance with the aforementioned GDPR. As regulated by Art. 28 of the GDPR, the list of Data Processors is updated regularly and can be consulted here: <https://www.intesa.it/en/dpa-exhibit-supplier-list/>.

The Personal Data of persons applying to sign up to the service may also be disclosed, upon request, to the competent legal/legislative authorities in the event of a dispute.

Without prejudice to the foregoing, your personal data cannot be disseminated by Intesa or by appointed third parties. For any questions concerning this policy, contact INTESA by filling out the form available on the website <https://www.intesa.it/en/privacy/>. The message will be forwarded to the appropriate member of the INTESA Data Privacy Team, for example the Data Protection Officer or members of their team.

#### **6. Transfer of the data outside the European Union**

The Personal Data are stored on servers located within the European Union.

Without prejudice to the foregoing, INTESA declares that, for certain specific operations, your personal data may also be processed outside the European Union. In that case, the transfer of the personal data will, in any case, be performed while implementing the appropriate security measures, in accordance with applicable legislation. Persons identified as external Data Processors are selected based on compliance with European standards on data processing and enter into agreements with INTESA regarding the Standard Contractual Clauses, updated to reflect the provisions in force. Data subjects can obtain a copy of the personal data transferred outside of the European

Union, by contacting the Data Controller.

## 7. Rights of the Data Subject

As the Data Subject, you can exercise specific rights under personal data protection legislation.

You have the right to obtain confirmation as to whether or not Personal Data concerning you exist, even if they have not yet been recorded, and to have them sent to you in an intelligible format.

The Data Subject also has the right to submit a specific request to the Controller to find out:

- the source of the personal data;
- the purposes and methods of processing;
- the logic applied in the event of processing performed with the support of electronic tools;
- the identity of the Controller, Processors and Designated Representative;
- the persons or categories of persons to whom the personal data may be disclosed or that may gain access to such in their capacity as Designated Representative within the State, processors or appointed persons.

The Data Subject also has the right to obtain:

- the updating, rectification, completion or erasure of the Personal Data;
- confirmation that the operations referred to in the point above were performed by the Controller and any other persons who process the Personal Data to which the aforementioned requests relate.

The Data Subject has the right to:

- refuse, in whole or in part, to the processing of the Personal Data that concern them for legitimate reasons, even if the Personal Data to which the request relates are processed in a manner appropriate to the purpose for which they were collected;
- withdraw their consent, at any time, without prejudice the right to storage of the personal data processed as indicated in art. 5 above;
- submit a complaint to the personal data protection Authority, or another competent body, if the criteria for doing so are met.

To exercise the rights referred to in this article, the Data Subject may contract the Controller by filling out the form available at <https://www.intesa.it/en/privacy/>. It is hereby understood that the Controller will take the steps required to fulfil the requests of a Data Subject who exercises the rights listed above, unless doing so would involve the use of resources clearly disproportionate to the right protected or proves impossible.

Some of the aforementioned rights are subject to the limits arising from current regulations, in particular Art. 32, par. 3, lett. J) of the Italian Digital Administration Code, on the storage of personal data.

The data subject may, in any case, submit a complaint using the institutional channels of the national Data Protection Authority.

## 8. Final provisions

Further information on the personal data processing methods implemented by the Controller is available in the Intesa Privacy Protection Statement available on the website at the following link: <https://www.intesa.it/en/privacy/>.

The Controller reserves the right to amend and/or update this Privacy Policy based on potential legislative and regulatory developments that may occur based on applicable legislation. The up-to-date version of the Privacy Policy will be made available on the website: <https://www.intesa.it/en/privacy/>.

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