

**NOTICE FOR THE ACCESS TO THE WIFI NETWORK**  
**WITH REGARD TO PERSONAL DATA PROTECTION PURSUANT TO ART. 12 and**  
**FOLLOWING ARTICLES REGULATION (EU) 679/2016 AND TO THE LAW DECREE**  
**196/2003 AS AMENDED BY THE LAW DECREE 101/2018**



Pursuant to the new Regulation (EU) 679/2016, in compliance with the principle of responsibility undertaking any processing of personal data shall be lawful and correct. The manner by which a personal data related to natural persons is collected, consulted or otherwise processed shall be transparent to them, as well as the extent to which such data is or will be processed.

In this respect you are kindly requested to take note of the following notice.

Pappasole S.p.A., established in Via Di Carbonifera 14, Loc. Torremozza, 57025 Vignale Riotorto (LI), fiscal code 00719850497 and VAT number 01143690491,

AND

Econoetica srl, established in Bologna via Raimondi 26, fiscal code 02625221201 and VAT number it02625221201,

in their quality as joint controllers of the data processing, under and in pursuance of the Regulation (EU) 679/2016, hereby inform the data subject that the personal data concerning such subject, collected by the Controller or which will be subsequently requested and/or disclosed by third parties, are necessary and will be used for the purposes indicated here below.



**PURPOSES AND LAWFULNESS OF THE PROCESSING**

Under Regulation (EU) 679/2016 personal data shall be:

- Processed in a lawful, fair and transparent way with respect to the data subject (art. 5)
- Collected for identified, explicit and legitimate purposes and subsequently processed in a way that shall not be incompatible with such purposes (art. 5);

The purposes for which personal data are collected shall be the following:

- To consent the recording of and the access to the WiFi network;
- To enhance our service;
- To ensure the safety in the network infrastructure, by detecting any abuse and illegal conduct, which might bring about responsibilities for the account of the Controller;

The personal data, if any, concerning the data subject or gathered with him or her, upon prior consent, can be used for marketing purposes (i.e., as mere examples, to promote advertising or trading events, to launch advertising campaigns, promos and offers), purposes which can be achieved either by automated means, or otherwise in traditional manners.



## LAWFULNESS OF PROCESSING

Processing shall be lawful under the conditions here below:

- Pursuant to Art. 6, subparagraph 1, item a) of the Regulation (EU) 679/2016, under which such processing is lawful provided the data subject has given consent to the processing of his or her personal data for one or more specific purposes;
- Pursuant to Art. 6, subparagraph 1, item b) of the Regulation (EU) 679/2016 processing is required for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
- Pursuant to Art. 6, subparagraph 1, item d) of the Regulation (EU) 679/2016 processing is necessary in order to protect the vital interests of the data subject or of another natural person;
- Pursuant to Art. 6, subparagraph 1, item f) of the Regulation (EU) 679/2016, processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject requiring protection of the personal data, in particular where the data subject is a child. The legitimate interest if the Controller is linked to the handling of personal data for promotional and marketing purposes.



## MODALITIES OF PROCESSING AND OBLIGATION OF CONFIDENTIALITY

The data processing is carried out through computerized systems and/or paper documents by subjects committed to confidentiality, following purpose related methods and however in such a way as to ensure the safeguard and the confidentiality of data. In compliance with law provisions the data collected shall not be disclosed and divulged to third parties.

In order to consent the use of the WiFi network, the user's device providing the connection through the physical address (MAC address) will be detected and a register of the connection logs will be kept.

The use of the network enables to interact with social networks or other services (i.e. e-mail).

Any information which may be collected during the provision of the WiFi network is however subject to the privacy policy established by the user on the social network or the service used.

Where the user has downloaded an App on his/her device and such App permits the interaction with social networks or other services, it may happen that, even if the users connected with the WiFi networks are not using such social networks and such other services, the traffic data concerning the above mentioned users will be collected.



## **DISCLOSURE TO THIRD PARTIES**

Your personal data may be disclosed to third parties known to us solely for the aforementioned purposes and, in particular, to the following categories of subjects:

- External companies providing services on our behalf;
- Public Administration companies or bodies for the compliance with law requirements
- Professionals who may provide a support in the compliance with law requirements.

Such subjects will process personal data in their quality as Processors or as autonomous controllers.

During the ordinary use of the WiFi network, some personal data implicitly linked to the use of the network might be collected. The information shall not be collected for identification purposes, but this may take place through the processing by a competent Authority in view of detecting unlawful actions.

Actually the Authorities may request information under D. Lgs. 196/2003, art. 157, as amended by D. Lgs. 101/2018, and a feedback is mandatory. The data to be collected are the following: user's MAC address, user's IP address, date/time of the connection start, connection length, bytes transmitted and received.



## RETENTION PERIOD

Pursuant to art. 5 of the Regulation (EU) 679/2016 “Principles relating to the processing of personal data”, personal data shall be kept in a form that permits the identification of data subjects for no longer than is necessary for the achievement of the purposes for which the data are processed.

The personal data of data subjects can be kept for longer periods in compliance with the law provisions in force (for instance in accounting matters), and, nonetheless, any technical and organizational measure shall be adopted in order to generate processes of anonymization of data.



## RIGHTS OF THE DATA SUBJECT

Under the law provisions in force, the data subject can address the Controller to lodge a request for exercising his or her rights, such as they are stated to art. 15 and following in the Regulation (EU) 679/2016.

In addition to the above mentioned rights, the data subject has the right to lodge a complaint with the Supervisory Authority in the instances envisaged by law.

For further information with regard to the modalities to exercise the mentioned rights, please read “Procedure concerning the rights of the data subject” in the link [www.pappasole.it](http://www.pappasole.it).



## CONTROLLER, DPO AND PRIVACY COMMUNICATIONS

The join controllers are:

- Pappasole S.p.A., established in Via Di Carbonifera 14, Loc. Torremozza, 57025 Vignale Riotorto (LI), fiscal code 00719850497 and VAT number 01143690491 (DPO: Dott. Lorenzo Giannini; [lorenzo@privacysolving.it](mailto:lorenzo@privacysolving.it));
- Econoetica srl, established in Bologna via Raimondi 26, fiscal code 02625221201 and VAT number it02625221201,

For any communication pursuant to the above quoted articles of the Regulation (EU) 679/2016 the Controller provides the following address: Via Di Carbonifera 14, Loc. Torremozza, 57025 Vignale Riotorto (LI); Phone number 0565 20639; Fax 0565 20346M Email [info@pappasole.it](mailto:info@pappasole.it).