



TREATMENT OF PERSONAL DATA

It exists a very huge regulations about customer's treatment of personal data, in Italy and in rest of world. SeFlow will respect all rules and regulations, especially GDPR that UE approved last month; in this document you will find all lineguides about treatment of personal data that SeFlow follow for all thier customers.

In addition to general regulations, there are further rules about data that customers give to SeFlow; Customer must know these rules and respect it.

GDPR

General Data Protection Regulation (GDPR) is the legal framework about treatment of personal data in Europe from May 25th 2018. The GDPR can be applied in every country in UE and it does not need any national transpositioni. GDPR will unify european legal regimes about personal data protection. Also, GDPR can be applied outside UE, in certain cases.

If in your society you manage personal data, you will respect GDPR rules and so you have to adopt all necessary measures. Same is for SeFlow: it will have different role in order to be delegate or manager about personal data.

Follow some defintions:

- personal data: every information about a person that can be indetified (directly or not);
- Treatment: every operation that concern personal data manage with automatic process or manually, like registration, storage, consultation, datamining, etc;
- Manager of treatment of personal data: he is the one who decide how and when personal data will be used and conserved in infrastructure;
- Delegate of treatment of personal data: He is the one who manage personal data.

SeFlow is the delegate of treatment of personal data: it happens when customer use SeFlow's services and SeFlow register thier personal data. According technical bonds, SeFlow will manage personal data in order to follow customer's request.

OBBIGATIONS IN TREATMENT OF PERSONAL DATA

- Personal data will be manage only for services that customer request; SeFlow does not use that information for marketing or other activity;
- Personal data will not be transferred outside UE or in country that UE recognize like not safety; SeFlow can do this only if customer choose a datacenter outside Europe;
- SeFlow will inform all customer about externalization of personal data's treatment; actually all personal data are managed inside SeFlow.
- SeFlow will update all infrastructure in order to guarantee maximun safety of all services;
- Customer will be informed about him personal data's infringement as soon as possible;
- Customer will have all regulations and some FAQ in order to help him.



OBBIGATIONS IN TREATMENT OF PERSONAL DATA MANAGEMENT

SeFlow will be manager of personal data when it decide how treat personal data and how use them; for example. When personal data are used for invoicing, service erogation, commercial promotion and other

In this way, SeFlow will assure:

- personal data collect will be minimum possible; when customer buy one of our service, he will give us only invoice and legal data (according with Italian rules);
- Personal data will not use for different purposes;
- Personal data will be conserved only until service will be active; after contract ending, they will be cancelled definitively;
- Personal data will not transferred to third parts or society not linked with SeFlow;
- Guarantee maximum protection level in its infrastructure.
- Guarantee safety about server's location, in order to prevent unauthorized access;

SOME GUIDELINEES

Personal data will be on customer's property; SeFlow will use these data in order to provide services. SeFlow will not sell personal data and will not use these information for marketing or other activity.

SeFlow can access to personal data in this two ways:

- Customer authorize SeFlow to check personal data in order to give him assistance or in order to optimize services; customer can give that authorization by ticket and SeFlow can be access to personal data. Authorization can not be permanent.
- Authority request.

Personal data will be manage inside UE, unless customer choose a datacenter outside UE.

When customer choose UE datacenter, personal data will not be transferred outside UE countries.

When customer choose a datacenter outside UE, that data will be moved on country in which datacenter stay; SeFlow can not modify datacenter choose without customer authorization; in order to help customers that choose a datacenter outside UE or in country that not guarantee protection, SeFlow can manage personal data according to art. 46 del GDPR.