Privacy
and
Data Handling Policy

Introduction

DBN Communication srl / eDock ("We") are committed to protecting and respecting your privacy and personal details.
This policy, together with our terms of us, set out the basis on which any personally identifiable data we may collect from you, or that you provide to us will be processed by us.

We strongly support the fundamental rights to privacy and data protection as well as compliance with national and international privacy laws and regulations. We commit to maintain confidential any personal information and to strictly limit any disclosure in accordance with local laws and requirements.

The rules on processing, storing and transmittal of data are set out in the General Data Protection Regulation ("GDPR"). This regulation aims to regularise and set out the aims, requirements and processes by which businesses must handle data from which a person or entity can be identified.

This data privacy policy is applicable in DBN Communication srl / eDock for the collection, processing, use, dissemination, transfer and storage of personal information of our employees, candidates, customers, suppliers or any individual who enters in contact with our services.

It imposes common rules for all entities of all countries (unless the national law provides more stringent requirements) and aims at ensuring a high level of protection of personal information withing our company.

Who Are We?

DBN Communication srl / eDock are a data controller in that we define what data we require so as to undertake our business. This includes email addresses, phone numbers, street addresses and payment details for both companies and individuals.

DBN Communication srl / eDock are a data processor in that we collect, process, store and use data coming from different sources (internal and external, e.g. from marketplaces) in order to offer our services to our customers in the course of our business. We also store and process data regarding our personnel and subcontractors so that we may undertake our duties as employer or principal contractor.

Definitions

Data Controller	A controller determined the purposes and means of processing data.
Data Processor	A processor is responsible for processing and handling data on behalf of a controller.
Data Subject	The subject is a person, entity or company on which the data is based, or by which the subject can be identified.
Processing	Any operation or series of operations which is performed on data whether by manual or automatic means. This can be collection, recording, organisation, structuring, storage, adaptation, alteration, retrieval, consultation, use, disclosure, dissemination or otherwise making available. It also includes erasure, overwriting or destruction.
Customer	A user of eDock, identified by dedicated credentials and able to access, use and process data that is owned by his business.
Data Source	A source for data, authorized for access to eDock by a Customer, in order to let us offer our service to the Customer.
Third Party	A natural or legal person, authority, agency or body other than the data subject, controller or processor.

Data Categories

Personal Data	The GDPR applies to "personal data" meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier (as explained in Article 6 of GDPR). These can range from names, identification numbers (i.e. passport, bank account etc.), addresses (home, business or social), or electronic contacts (email, social media accounts, telephone numbers). In addition these could include online identifiers such as IP addresses or use of cookies.
Special Categories	Article 9 of GDPR refers to sensitive personal data as "special categories of personal data". The special categories specifically include genetic and biometric data which can be processed to uniquely identify an individual. Other examples include race, ethnicity, sexual orientation, trade union membership, politics, religion, philosophy, sexual expression and data relating to a person's health.

Binding rules to process personal information

All DBN Communication srl / eDock entities must observe and transpose into their day to day local practices the following principles when processing personal information. All entities must ensure that these rules are effective.

Principles 1
Processing personal information fairly and lawfully.

Principles 2
Processing personal information for specified, legitimate purposes and not processing further in ways incompatible with those purposes.

Principles 3
Collecting personal information which is relevant to and not excessive for the purposes for which it is collected and used.

Principles 4
Keeping personal information only as long as it necessary for the purposes for which it was collected and processed.

Principles 5
Maintaining personal information accurate, and where necessary, kept up-to-date.

Principles 6
Processing personal information in accordance with the individual's legal right.

Principles 7
Taking appropriate technical, physical and organisational measures to prevent unauthorized access, unlawful processing, and unauthorized or accidental loss, destruction, or damage to personal information.

Principles 8
When collecting sensitive personal data, DBN Communication srl / eDock entities must ensure that the individual is informed and/or has provided consent to such collection and processing.

Use of Data

We will only use the data only in order to offer our services to our customers. This means that we neither sell nor share nor give access to thirds to data owned by our customers.

Customers are required and enforced to use data only in accordance with this Privacy and Data Handling Policy.

All entities must collect, process and use data for legitimate business purposes only. DBN Communication srl / eDock and its entities must process personal data for legitimate business, human resources and safety & security purposes. Such processing will be conducted within such purpose limitations and in accordance with applicable laws.

Categories of Data Concerned

DBN Communication srl / eDock will control and process data of only Personal category.

To the limited extent a DBN Communication srl / eDock entity needs to collect any sensitive personal information, it must ensure that the individual is informed of such collection and processing and has provided his consent.

Where required by law, the person's explicit consent to the processing and particulary the transfer of such data to non-DBN Communication srl / eDock entities must be obtained.

Appropriate security and protection measures (e.g. physical security devices, encryption and access restrictions) must be provided depending on the nature of these categories of sensitive data and the risks associated with the intended uses.

Legal Basis

Our lawful basis for processing of personally identifiable data:

Consent of the data subject	By means of email, conversation or documentation (letter or form)
Entering into a contract	Identifiable information will form part of any contract. All contracts are held in confidence
Authorized by our customer (third-party)	As soon as a contract is signed between a customer of us and our company, our customer may authorize eDock to access certain personally identifiable information such as name, addresses, email and ordered goods. This authorization may be revoked at any time by our customer, even before the contract between our two companies has closed.

Transmittal of Personal Data

Personal data will be treated as strictly confidential, being shared only with expressed consent from the data subject. Transmission of data outside of this scope will be treated as a breach of company policy.

We guarantee to give access, modify or remove data related to a particular user if requested, at any time, even without the consent of our customer. View "Rights as a Data Subject" section.

Storage Duration

Personal data will be stored for no longer than reasonably necessary, for legal purposes or where further interaction would be mutually beneficial for business purposes. For example we will not retain personal data regarding contracts longer than necessary to fulfil requirements under the contract.

Different Data Sources enforces us to treat data (store, manage and process) in different ways, with different storage durations. We guarantee that we respect any requirement imposed by any Data Source, whose access has been granted by a Customer, even if this goes against our Customer's interest.

Rights as a Data Subject

Unless subject to an exemption under GDPR you have the following rights with respect to your personal data.
These apply to ANY controller or operator of your data:

- The right to request a copy of the personal data held
- The right to request correction of data fond to be inaccurate, out of date or no longer relevant
- The right to request erasure of data no longer required to be retained
- The right to request transmittal of data to another controller or operator. i.e. you can request that we release specified information to another party on your behalf, or for the means of proof of a requirement
- The right to place a restriction of processing of data. i.e. you can say that your data can no longer be used as part of collation processes except where required under legislation, in which case such data will be anonymised so that you cannot be identified
- The right to object to the processing of personal data. i.e. your data can no longer be processed as detailed.

Transfer of Data Outside of the EEA

The GDPR applies to any data processed or stored inside the European Economic Area ("the Area"), or to data that is transmitted from, to or via the Area.
Entities within this area are protected under GDPR and any entities outside of this area but who deal with entities protected under GDPR must sign a document stating that they will abide by GDPR with regards to data subjects covered by this document, which may include clients, contractors, subcontractors or personnel of DBN Communication srl / eDock located, domiciled or otherwise resident outside of the EEA.

Automated Decision-making

DBN Communication srl / eDock do not currently use any form of automated decision-making processes in our business.

Data sharing with Third -Parties

When personal information is provided to DBN Communication srl / eDock, either directly of through a reseller or other business partner, DBN Communication srl / eDock: will:

- not sell or rent it to third parties without data subject permission unless (s)he opts-in and permitted by policies.
- use customer contact information to provide them with information.

DBN Communication srl / eDock entities may be required to share personal information with selected third parties who perform certain business or employment related services on their behalf. Such data sharing is submitted:

- to a written agreement stipulating the third party commitments to protect personal information of the individuals concerned.
- to the respect of the European rules on trans-border data flows when third party is located outside the European Union.

Security measures

DBN Communication srl / eDock are committed to taking appropriate technical, physical and organisational measures to protect its employees and customers' personal data against unauthorised access, unlawful processing, accidental loss or damage and unauthorized destruction.

- DBN Communication srl / eDock limits access to its internal systems that hold personal data to a selected group of authorized users who are given access to such systems through the use of a unique identifier and password. Access to Personal Data is limited to and provided to individuals for the purpose of performing their job duties.

- DBN Communcation srl / eDock entities must refer to the IT Security policies which detail the security requirements for an acceptable use, access, transmission of DBN Communication srl / eDock information.

Changes to Privacy and Data Handling Policy

Any changes made to our policy will be posted to those affected by email or on our website.

Making Us Aware

Our contact details for any data matters is developer@edock.it
This email should be used to exercise all relevant rights, make queries or comments or request updated policies.

If, after contacting us as above, your query is not resolved to your satisfaction you should direct your complaint to:

DBN Communication srl
Corso Acqui, 382 - 15121 Alessandria (Italy)
Or by phone: +39.0131.251385