

Information on the use of personal data

TETIS Institute S.r.l. (TETIS), in line with its mission and institutional values, is committed to protecting the personal data of every person in respect of the identity and dignity of every human being and the fundamental freedoms constitutionally guaranteed in compliance with the General Data Protection Regulation (EU) No. 2016/679 ("GDPR") and the national privacy legislation (Legislative Decree 30 June 2003, No. 196, as amended), relating to the protection of personal data of natural persons (data subjects), as well as the free movement of such data.

This commitment will be constantly followed by TETIS within the principles of lawfulness, fairness and transparency and all other principles set out in Article 5 of the Regulation, implementing an accountability policy by consistently putting in place appropriate technical and organisational measures and suitable policies to ensure and be able to demonstrate that processing is carried out in accordance with the Regulation.

Pursuant to Articles 12 and 13 of the GDPR, we therefore provide you with some information necessary to illustrate how we will use and process the personal data concerning TETIS associates (hereinafter "Personal Data" or simply "Data").

- **1. Data Controller**

The Data Controller is TETIS Institute S.r.l. (with registered office in Genoa, Via Gropallo 4/19 - 16122) (hereinafter "the Company" or "TETIS"), which is responsible towards you for the legitimate and correct processing of your Data.

- **2. Personal Data we process**

The Data that will be processed by us may include, among others:

- identification and contact data (such as, by way of example and not limited to, name and surname, tax code, address and company role, email/certified email address, identity document, phone number/FAX);

- **3. Purposes and legal basis of data processing**

Personal Data are collected from the data subject as a representative of the party accepting the general contract conditions for the use of the VER eCO2care Registry and will be processed within the scope of TETIS's institutional activity for:

1.

2.

	The legal basis for the processing of your Data and your Sensitive Data for purpose i) is represented by the need to execute the contract in place between the account holders (Buyers, Sellers or Delegates) and the Company, pursuant to Article 6.1(b) of the GDPR
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3. to give correct and complete execution to the contract for the use of the platform

4.

5.	
	The legal basis for the processing of your Data for purpose ii) is represented by the need to comply with a legal obligation to which the controller is subject, pursuant to Article 6.1(c) of the GDPR.

6. to comply with the obligations provided by the legislation in force from time to time as well as the obligations provided in the fiscal and accounting fields.

7. In particular, the Data Subjects involved in the processing activities are natural persons, specifically the representatives designated by the account holder, who transmit their personal data and those of the account holder (if a natural person) in order to complete the application for registration to the aforementioned Registry and to use the related services..

- **4. Recipients of data - transfer of data to third countries / international organisations - Automated processing**

1. Scope of circulation of personal data

Within the scope of processing Data for the purpose mentioned in point 3 above, your Personal Data may be communicated or otherwise made accessible to third parties such as service providers for the management, maintenance/support of our information systems and management software used by us and our service providers (e.g. training, event organisation, etc.).

Where necessary, we will appoint third parties as our Data Processors pursuant to Article 28 of the GDPR.

Upon request addressed to us using the contact details indicated in point 7 below, we will inform you who the third parties are to whom your Data have been communicated.

Within our organisation, your Data will be communicated to and processed by employees and internal collaborators of the Company. These individuals will be duly authorised and instructed in the processing, pursuant to Article 29 of the GDPR and Article 2-quaterdecies of Legislative Decree 30 June 2003, No. 196.

If necessary, they may be communicated to: subjects to whom the communication of data must be made in compliance with an obligation provided by law, by a regulation or by community legislation, or to comply with an order of the Judicial Authority.

2. Transfer of personal data abroad

The transfer of data to countries located outside the European Union is not normally envisaged. If necessary, any transfer of Data outside the European Union, in the absence of an adequacy decision pursuant to Article 45 of the GDPR or appropriate safeguards pursuant to Article 46 of the GDPR, will take place if necessary for the execution of the contract or with your explicit consent which, if applicable, we will take care to request from you, pursuant to Article 49.1(a) and (b) of the GDPR.

3. Automated processing

The Company does not adopt decisions likely to influence the data subject based exclusively on the automated processing of personal data, including profiling. All decision-making processes associated with the processing purposes described above are carried out with human intervention.

- **5. Data retention period**

Subject to legal obligations, Tetis retains data relating to all transactions, registry data and account holders' data for 10 years after the account closure.

Notwithstanding the above, TETIS may retain certain personal data of the Data Subjects even after the termination of processing and this exclusively to defend or assert its own right or in cases provided for by law or by order of a judicial or administrative authority.

After the retention period indicated above, Personal Data will be deleted.

- **6. Nature of data processing**

The provision of Data for the purposes referred to in the preceding points 3 sub (i) and (ii) constitutes a necessary condition for joining the Company; consequently, in case of your refusal or request for deletion of data, we will not be able to establish or continue the same and, specifically, the contractual relationship will be terminated.

- **7. Rights of the data subject**

Pursuant to Articles 13(2)(b), (c) and (d), 15, 16, 17, 18, 19, 20 and 21 of the GDPR, we inform you that:

- a. You have the right to request **access** to your Personal Data together with information relating to the purpose of the processing, the category of Data processed, the subjects or categories of subjects to whom they have been or will be communicated (with an indication of whether such subjects are located in third countries or are international organisations), when possible the period of retention of the Data or the criteria used to determine this period, the existence of your rights of rectification and/or deletion of Personal Data, of limitation of processing and of opposition to processing, your right to lodge a complaint with a supervisory authority, the origin of the Data, the existence and logic applied in case of automated decision-making process. If you exercise this right and unless you indicate otherwise, you will receive an electronic copy of your Data that are being processed.
- b. You also have the right to obtain:
 - i. the **rectification** of your Data, if they are inaccurate or incomplete;
 - ii. the **deletion** of your Data, if one of the conditions set out in Article 17 of the GDPR exists (for example: your Data are no longer necessary in relation to the purposes for which they were collected, you decide to revoke your consent to processing - where this represents the legal basis - and there is no other legal basis for the processing itself, you object to the processing and there is no other legitimate interest of the Controller, your Data are unlawfully processed);
 - iii. the **limitation** of the processing of Data concerning you 1) for the time necessary for the Company to ascertain the accuracy of your Data (if you have contested it), or 2) if the processing of the Data is unlawful and you request, instead of the deletion of your Data, the limitation of the related processing, or 3) when the Company no longer needs your Data but they are necessary for you to establish, exercise or defend a legal right in court, or, finally, 4) for the time necessary to assess the possible prevalence of the legitimate reasons of the Controller over yours, if you have objected to the processing of your Data pursuant to point c) below;

- iv. your Data in a structured, commonly used and machine-readable format also for the purpose of transmitting them to another controller, if the processing is based on consent or on a contract and is carried out by automated means (so-called right to data portability). If you are interested, you can ask the Company to transmit your Data directly to the other controller, if this is technically feasible.

c. You also have the right to **object** to the processing of your Data, if such processing is carried out pursuant to Article 6.1(e) (i.e. to comply with a legal obligation to which the Controller is subject) or letter f) (i.e. to pursue a legitimate interest of the Controller) of the GDPR, unless there are compelling legitimate grounds for the Controller to proceed with the processing, pursuant to Article 21 of the GDPR.

d. If you are not satisfied with the processing of your Data by us, you can **lodge a complaint** with the Data Protection Authority, following the procedures and indications published on the official website of this authority (www.garanteprivacy.it).

e. Any rectifications or deletions of your Data or limitations of processing made at your request - unless this proves impossible or involves a disproportionate effort - will be communicated by us to each of the recipients to whom your Personal Data may have been transmitted in accordance with this information notice.

The exercise of the above rights is not subject to any formal constraint and is free of charge. We may only ask you to verify your identity before taking further action following your request.

To exercise your rights, you can contact the Company by sending a registered letter with return receipt to the address indicated in point 1 above, or by e-mail using the following address: registry@eco2care.org

Last update: December 2023