

PRIVACY NOTICE

*Caligo makes a point of protecting your privacy by processing your personal data in compliance with the **General Regulation for Data Protection (EU Regulation 2016/679)** and based on the principles of lawfulness, fairness, transparency, limitation of purpose and retention, data minimisation, accuracy, integrity and confidentiality.*

WE DO NOT collect, store or use personal data for direct marketing, advertising or profiling activities: we are proud to work only by word of mouth and repeat business!

For any questions or requests regarding the processing of your personal data, please contact the Data Controller at: privacy@caligo.cloud.

DATA PROCESSING: WHO, WHAT, HOW and WHY

1. Your data may be processed by or shared with:
 - Co-workers or GDPR-compliant subcontractors (colleagues involved in the project or third-party providers) – ONLY in cases where personal data in the files cannot be pseudonymised
 - Our tax consultants, for compliance with law requirements
 - Competent authorities, should they so require

In addition, third parties in charge of software and hardware maintenance may have indirect access to the personal data stored in our system.

We DO NOT share nor give access to your personal data to anyone else.

2. What personal data do we process?

We only collect and process the minimum amount of data as necessary, namely:

- Names of our clients and suppliers or their representatives
- Contact details (e-mail address, phone number, Skype address etc.)
- Invoicing details (tax and/or VAT number, invoicing address)
- Bank details (if necessary)

In addition, we also process any other personal data that you may spontaneously volunteer or is made publicly available, for example: photo and other contact details in your e-mail signature or other personal data contained in the documents you share with us.

3. How and why do we process your personal data?

At Caligo, we process your data for the following purposes...

- Providing or requesting professional services, for example: to send quotations, provide consulting services, appoint a software developer etc. In this respect, the lawful basis for processing your data is performance of contract (art. 6, par. 1, letter b) of the GDPR)

- Invoicing, payment and compliance with law requirements. In this respect, the lawful basis for processing your data is compliance with a legal obligation (art. 6, par. 1, letter c) of the GDPR)

... by using the following means:

- Electronic devices (desktop, laptop and mobile phone etc.), all protected by passwords and other security systems
- Hardcopy (for invoices and other accounting documents)

Your data is stored...

- On a local server, adequately protected and located in Italy
- E-mails are stored on an online Microsoft server, located in the USA
- A hardcopy archive with restricted access, also located at our premises in Italy

GOOD TO KNOW: we're only going to print it if we really, really need to. Caligo is environmentally-friendly as well as GDPR-compliant!

... for as long as:

- Our professional relationship lasts or
- The minimum retention period required by applicable laws (10 years for invoices and accounting records)

Any personal data contained in the documents we receive and use to provide our services is only retained for as long as necessary to provide said services, after which it is either deleted or pseudonymised.

Any personal data collected from business contacts that do not result in a professional relationship (e.g. enquiries or quotations) is removed within 2 years or immediately on request by the person concerned. In these cases, the lawful basis for processing is legitimate interest (art. 6, par. 1, letter f) of GDPR).

Your rights

As Data Subjects, you have the following rights:

- ✓ The right to access your personal data and be informed on which data we process and how – free of charge
- ✓ The right to request the rectification or erasure of your personal data
- ✓ The right to object to your personal data being processed and to request the restriction of processing
- ✓ The right to data portability
- ✓ The right to lodge a complaint with the competent Supervisory Authority (Italian Data Protection Authority) if you think that your personal is not being processed lawfully

To exercise your rights and receive more information on how Caligo collects and processes your personal data, please contact the Data Controller at: privacy@caligo.cloud.