

## **DOI SERVICE – PRIVACY POLICY**

### **COMPLETE POLICY ON PERSONAL DATA PROCESSING**

#### **Data Controller**

Personal Data is processed by **EDISER S.r.l.**, Sole Shareholder and Service Provider for **AIE – Associazione Italiana Editori** (*Italian Editors Association*), as DOI Registration Agency.

How to contact us:

*Ediser S.r.l*

Subjected to the direction and coordination of **AIE** – Milan

Established in Corso di Porta Romana 108 – 20122, Milan

For any further information or request about privacy, the subject may contact us at any moment by e-mail at the address: [privacy@ediser.it](mailto:privacy@ediser.it).

#### **Data Processed**

The Personal Data we collect corresponds to that contained in the Contract and in the Customer Card, as well as the data which will be given to us by the subject who wishes to make use of the DOI Service.

We process your data to comply with:

1. the **DOI Assignment Contract**: in order to allow the request and use of the DOI Service, and in order to satisfy the registering Subject's request.
2. legal obligation to which we are subject, such as the EU General Data Protection Regulation and other regulations.

In fact, we might need further information (biographical data) to confirm the subject's identity, should the subject want to exercise the rights over the processing of his/her data.

#### **Legal Basis**

The **DOI Assignment Contract** lawfully allows us to process your personal data with regard to the management and execution of the DOI Service.

It is necessary for us to process your data in order to allow you to exercise your rights, as we are legally obligated to do so. Under particular circumstances, we are going to process contact data in order to forward specific information to the subject.

#### **Processing Methods**

We will process your personal data mostly by informatic and electronic means. Our ever-changing services might force us to process your data through methods and for purposes different from those mentioned above; the data will be processed in total compliance with the General Data Protection Regulation, and for purposes compatible with those mentioned in this policy; we will promptly inform you about any new activity and data processing before it will take place. Should the data subject consider it appropriate, he/she has the right to object the processing of personal data for new purposes.

## **Data Recipients**

Your data will be known by:

- Specifically authorized personnel of Ediser S.r.l.;
- Italy-based subjects that provide commercial, administrative, fiscal and legal support to Ediser;
- Internet and IT service providers
- Should the need arise, personal data will be transmitted to police forces, legal and administrative authorities in order to assess and pursue crimes, in order to safeguard public safety, and for Ediser S.r.l to defend itself before a Court as well as to safeguard others' rights and freedom.

## **Extra EU Data Transfer**

The Data Controller does not voluntarily transfer any data outside the European Union. We inform you that the Controller uses Microsoft Azure Cloud Service, which guarantees proper measures of protection of personal data, among them:

- ISO/IEC 27001 Certification on Information Security and ISO/IEC 27018 Certification on Cloud Services and Privacy

Regarding Extra EU data transfer, the Data Controller specifically requests the data stays within the European Union borders, although technical and maintenance reasons might require the data to be transferred outside of the EEA; the provider anyway guarantees:

- that the data will be transferred in countries deemed adequate by the EU Commission
- to sign specific Standard Clauses regarding Extra EU data transfer – as stated by the EU Commission in order to guarantee safe transferring and processing of the data outside of the EU borders.
- compliance with the EU-US Privacy Shield Framework

## **Data conservation duration**

We will keep your personal data for a limited span of time, after which it will permanently deleted or irreversibly anonymized.

Specifically:

- with regard to DOI Service purposes, we will keep the data until the complete fulfilment of its obligations;
- we will keep your data, in compliance with the General Data Protection Regulation, until all processing purposes are fulfilled.

For technical reasons, we will cease any processing and delete all the data (or anonymize it) no later than 30 days after the specified terms.

## **Data Subject's Rights**

With regard to the processing of your personal data, the subject can, at any moment, exercise the rights listed below:

### **a) Right to Access and Rectification**

The subject has the right to access his/her personal data and to request its update and rectification. We will not accept any request of integration of the data with further information we do not specifically need to fulfill the processing purposes listed above, in compliance with the GDPR.

Should the subject want to, we will provide him/her with a copy of the data we possess, as well as with the specific information about its processing.

**b) Right to oppose the processing**

The subject has the right to oppose personal data processing at any moment and for any purpose, no further justification needed. When we process your data to comply with a legal obligation, this right cannot be exercised. Should the subject exercise this right, we will promptly cease any further processing with regard to any specific purpose.

**c) Right to erasure**

Should any circumstance listed in the GDPR arise, the subject can request the full erasure of his/her personal data. Once the request is received and its legitimacy is assessed, we will promptly cease any processing of your data.

**d) Right to request temporary limitation of data processing**

The data subject can request the processing of his/her personal data is limited; we will therefore keep your personal data, but no processing will occur, without prejudice to different requests and the exceptions dictated by the law. The data subject can request the limitation when:

- the accuracy of the data is contested;
- the processing is unlawful yet opposed to full data erasure;
- we no longer need your data, yet you might need it to exercise your rights before a Court.

**e) Demand your data or transfer it to a subject different from Ediser S.r.l (“right to portability”)**

The subject can demand his/her data in a structured, and legible on an automatic device, format. Should you request so - where technically possible - we will transfer your data directly to a third party you have personally chosen. When we process personal data to comply with legal obligations, the subject cannot exercise this right.

In order to exercise the rights listed above, the subject may need to contact us (see our contacts above).

## Claims

Should you ever believe the processing of your data is unlawful, you have the right to lodge a complaint with a supervisory authority. In Italy, you can lodge a complaint to the **Italian Data Protection Authority**. For further information you can visit the official website [www.garanteprivacy.it](http://www.garanteprivacy.it)

A claim can be brought before a different authority from the Italian one, when such authority is the one competent for the subject’s State of residence or where the subject works (within the EU borders); or again when the authority is the one competent for the State where the alleged privacy violation has occurred.

## Relevant legislation and links

Ediser S.r.l processes your data in compliance with: the *EU General Data Protection Regulation 2016/679 - as well as free data circulation - which repealed the EC 95/46 Directive (General Regulation of Data Protection)*; the Italian legislation on personal data processing; the decisions of the Italian Data Protection Authority and the EDPB.

If you want to read the full text of the GDPR 2016/679 and the Italian legislation on the matter, as well as the decisions of the Italian Data Protection Authority, you can visit the website [www.garanteprivacy.it](http://www.garanteprivacy.it)

## Updates

This policy might be updated. We will make sure to inform you about any change to this policy and the consequences of such change.

*(Last Update: February 18th, 2019)*