

**External Data Processor  
GDPR (General Data Protection Regulation) – EU Regulation 679/2016  
Privacy Code D.Lgs 196/2003 (amended by D.Lgs 101/2018)  
Protection of Personal Data of the Data Subjects**

Dear Customer,

Regarding one or more of the services in place with our company, such as:

- Email inbox management
- Management of e-commerce platform (e-commerce) and related cloud services
- Management of WP sites and related cloud services
- Management of apps and related cloud services

In accordance with the above Regulation and in particular Articles 4 and 28 of the GDPR, we, as the external data processor, regarding the personal data for which you are, in accordance with current legislation, the "Data Controller", guarantee the following:

1. The personal data of the data subjects, which WEBLINK SRL may occasionally or incidentally become aware of during the provision of development or maintenance services for your e-commerce platform, are processed at our facility by appropriately appointed and trained personnel in compliance with current regulations (EU Regulation 679/2016, D.Lgs 196/2003 as amended by D.Lgs 101/2018) and equipped with appropriate credentials.
2. The personal data are processed according to the principles of lawfulness, transparency, and fairness towards the data subject, as established by Articles 5 and 6 of the GDPR.
3. All security measures are adopted in compliance with the new EU Regulation (Articles 29, 30, 32 of the GDPR).

The servers used for the provision and management of the aforementioned services are owned by NgWay Srl (based in Somma Lombardo Va), located in Italy, and are certified ACN QC1 (ACN Agency for National Cybersecurity). Technical documentation is available upon specific request via email.

We remind you that the data controller must demonstrate compliance with the GDPR by applying the accountability principle, implementing appropriate technical and organizational measures to ensure and demonstrate compliance, which must be continuously demonstrated.

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## **Description of Security Measures Adopted for Data Retention and Protection**

### **Introduction**

As part of the customer data processing, the following document lists the security measures taken to ensure the service remains constantly available and data security is guaranteed.

### **Data Center Features and Anti-Intrusion Security Systems**

- Physically isolated Web Farm
- Access control system with badge and multi-level numeric code
- Anti-intrusion detection system
- Security personnel presence 24 hours a day, seven days a week
- Closed-circuit cameras and digital storage of footage
- Smoke, fire, and flood detection systems

### **MAXIMUM GUARANTEE OF ELECTRICAL CONTINUITY AND ENVIRONMENTAL CONDITIONING SYSTEM**

A fundamental element of the Web Farm infrastructure is the power supply.

To ensure the maximum guarantee of electrical continuity and environmental conditioning, in addition to the main power supply directly connected to the regional ring of the energy provider, the Web Farm is equipped with:

- Main transformers 100% redundant
- 100% redundant Uninterruptible Power Supplies (UPS)
- Generators with activation time < 10sec
- Rack cabinets with dual power supply and short-circuit interruption power at the first upstream switch of the rack
- 100% redundant air conditioning system
- Full climate control capable of maintaining a temperature delta ( $\Delta T$ ) < 1°C
- Single rack cabinet with forced cooling and heat extractor from the top

### **ADVANCED NETWORK CONNECTION FOR BANDWIDTH AVAILABILITY AND RELIABILITY**

Our provider has an ultra-high-speed IP network, which includes, among others, peering with the major industry operators:

- Connection to MIX (Milan Internet eXchange)
- Connection to NAP (Neutral Access Point of Rome)
- Connection to TIX (Tuscany Internet eXchange of Florence)
- Connection to VSIX (Veneto Satellite Internet eXchange of Padua)

These connections, along with a direct connection to the Wind Data Center without external lines, ensure optimized traffic on the networks, avoiding congestion and providing ideal service quality.



This guarantees excellent visibility of customer websites/portals for all national and international Internet users.

#### **EFFICIENCY AND SECURITY OF THE ARCHITECTURE**

- Network free of single points of failure
- Clustered architecture or with local directors to ensure the performance advantage of load balancing
- Service continuity and reliability above 99.99%

#### **MAXIMUM SECURITY OF THE SERVICES PROVIDED AND CLIENT NETWORK (LAN)**

- Multiple levels of firewalls, always used in pairs with mutual failover to avoid network disruption in case of failure
- Firewalls from different providers to limit vulnerability to hacker attacks
- Intrusion Detection tools installed at key points of the network

#### **Application Features**

##### **EMAIL SERVICES**

- Email services store username and password data in an encrypted mode, and mail servers are constantly updated and protected by firewall systems.

##### **WEB SITES and WEB APPLICATIONS**

- The website is configured with SSL security with a private key of no less than 2048 bits (only upon customer request).
- Server-to-server communications are established with SSL security with a private key of no less than 2048 bits (only upon customer request).
- User data is stored in the database in a protected password mode and encrypted where they represent login credentials for any service.
- The database servers used are state-of-the-art and protected by firewalls.
- The operating systems adopted by Weblink are up-to-date, and a security patch update policy from the manufacturer is followed.