

Privacy Policy

The purpose of this document is to inform the natural person (hereinafter “**Data Subject**”) about the processing of his/her personal data (hereinafter “**Personal Data**”) collected by the data controller, ByteWex Srl, with registered office in Viale Timavo 85, 42121 Reggio Emilia - RE, Tax Code/VAT No. 02896470354, e-mail address privacy@bytewex.com (hereinafter “**Data Controller**”), via the website and the application LaborLumen and relative domain and subdomains: laborlumen.com, people.laborlumen.com, hub.laborlumen.com, passport.laborlumen.com, coaching.laborlumen.com, training.laborlumen.com, recruiting.laborlumen.com (hereinafter “**Application**”).

Changes and updates will be effective as soon as they are published on the Application. In case of non-acceptance of the changes made to the Privacy Policy, the Data Subject shall stop using this Application and may ask the Data Controller to delete his/her Personal Data.

1. Categories of Personal Data processed

The Data Controller processes the following types of Personal Data voluntarily provided by the Data Subject:

- **Contact Data:** first name, last name, address, e-mail address, phone number, pictures, authentication credentials, any further information sent by the Data Subject, etc.
- **Fiscal and payment Data:** tax code, VAT number, credit card data, bank account details, etc.
- **Data on the employment relationship:** data entered in the curriculum vitae, data on spouse or children, social security data, etc.

The Data Controller processes the following types of Personal Data collected automatically:

- **Technical Data:** Personal Data produced by devices, applications, tools and protocols such as, for example, information about the device used, IP addresses, browser type, type of Internet provider (ISP). Such Personal Data may leave traces which, combined with unique identifiers and other information received by the servers, can be used to create profiles of individuals
- **Usage Data:** such as, for example, pages visited, number of clicks, actions taken, duration of sessions, etc.
- **Data relating to the exact location of the Data Subject:** for example, geolocation data that precisely identifies the location of the Data Subject, which may be collected via the satellite network (e.g. GPS) and other means, collected with the consent of the Data Subject. The Data Subject may withdraw consent at any time.

If the Data Subject decides not to provide Personal Data for which there is a legal or contractual obligation, or if such data is a necessary requirement for the conclusion of the contract with the Data Controller, it will be impossible for the Data Controller to establish or continue any relationship with the Data Subject.

The Data Subject who communicates Personal Data of third parties to the Data Controller is directly and exclusively liable for their origin, collection, processing, communication or divulgation.

2. Cookies and similar technologies

The Application uses cookies, web beacons, univocal identifiers and other similar technologies to collect the Data Subject's Personal Data on visited pages and links and other actions performed during the use of the Application. This data is stored and then used the next time the interested party browses the Application. The full Cookie Policy can be viewed at the following address: [Cookie Policy - LaborLumen HCM](#).

3. Legal basis and purpose of data processing

The processing of Personal Data is necessary:

1. for the performance of the contract with the Data Subject and especially:
 1. **fulfillment of any obligation arising from the pre-contractual or contractual relationship with the Data Subject**
 2. **registration and authentication of the Data Subject:** to allow the Data Subject to register in the Application, to access it and to be identified in it, also via external platforms
 3. **support and contact with the Data Subject:** to answer the Data Subject's requests

4. **management of payment:** to manage payments by credit card, bank transfer or other methods
2. for legal obligations and especially:
 1. **the fulfilment of any obligation provided for by the applicable norms,** laws and regulations, in particular, on tax and fiscal matters
3. for the legitimate interest of the Data Controller, for:
 1. **marketing purposes by e-mail of products and/or services of the Data Controller** to directly sell the Data Controller's products or services using the email provided by the Data Subject in the context of the sale of a product or service similar to the one being sold
 2. **management, optimization and monitoring of the technical infrastructure:** to identify and solve any technical issue, to improve the performance of the Application, to manage and organize the information in a computer system (e.g. server, database, etc.)
 3. **security and anti-fraud:** to guarantee the security of the Data Controller's assets, infrastructures and networks
 4. **anonymous data based statistics:** in order to carry out statistical analysis on aggregated and anonymous data in order to analyze behaviors of the Data Subject to improve products and/or services provided by the Data Controller and better meet the expectations of the Data Subject
4. on the basis the Data Subject's consent, for:
 1. **retargeting and remarketing:** to reach with a customized advertisement the Data Subject who has already visited or shown interest in the products and/or services offered by the Application using his Personal Data. The Data Subject may opt-out by visiting the [Network Advertising Initiative page](#)
 2. **marketing purposes of the Data Controller's products and/or services:** to send information or commercial and/or promotional materials, to perform direct sales activities of the Data Controller's products and/or services or to conduct market research with automated and traditional methods
 3. **detection of the exact location of the Data Subject:** to detect the presence of the Data Subject, to control logins, times and presence of the Data Subject in a specific place, etc.

The Data Subject's Personal Data may also be used by the Data Controller to protect itself in judicial proceedings before the competent courts.

4. **Data processing methods and receivers of Personal Data**

The processing of Personal Data is performed via paper-based and computer tools with methods of organization and logics strictly related to the specified purposes and through the adoption of appropriate security measures.

Personal Data are processed exclusively by:

- persons authorized by the Data Controller to process Personal Data who have committed themselves to confidentiality or have an appropriate legal obligation of confidentiality;
- subjects that operate independently as separate data controllers or by subjects designated as data processors by the Data Controller in order to carry out all the processing activities necessary to pursue the purposes set out in this policy (for example, business partners, consultants, IT companies, service providers, hosting providers);
- subjects or bodies to whom it is mandatory to communicate Personal Data by law or by order of the authorities.

The subjects listed above are required to use appropriate measures and guarantees to protect Personal Data and may only access data necessary to perform their duties.

Personal Data will not be indiscriminately shared in any way.

5. **Place**

Personal Data will not be transferred outside the territory of the European Economic Area (EEA).

6. **Personal Data storage period**

Personal Data will be stored for the period of time that is required to fulfill the purposes for which it was collected. In particular:

- for purposes related to the execution of the contract between the Data Controller and the Data Subject, they will be stored for the entire duration of the contractual relationship and, after termination, for the ordinary prescription period of 10 years. In the event of legal disputes, for the entire duration of such disputes, until the time limit for appeals has expired
- for purposes related to legitimate interests of the Data Controller, they will be stored until the fulfilment of such interest
- in compliance with legal obligations, by order of an authority and for legal protection, they shall be stored according to the relevant timeframes provided for by such obligations, regulations and, in any case, until the expiry of the prescriptive term provided for by the rules in force
- for purposes based on the consent of the Data Subject, they will be stored until the consent is revoked

At the end of the conservation period, all Personal Data will be deleted or stored in a form that does not allow the identification of the Data Subject.

7. **Rights of the Data Subject**

Data Subjects may exercise specific rights regarding the Personal Data processed by the Data Controller.

In particular, the Data Subject has the right to:

- be informed about the processing of their Personal Data
- withdraw consent at any time
- restrict the processing of his or her Personal Data
- object to the processing of their Personal Data
- access their Personal Data
- verify and request the rectification of their Personal Data
- restrict the processing of their Personal Data
- obtain the erasure of their Personal Data
- transfer their Personal Data to another data controller
- file a complaint with the Personal Data protection supervisory authority and/or take legal action.

In order to use their rights, Data Subjects may send a request to the following e-mail address privacy@bytewex.com. Requests will be immediately treated by the Data Controller and processed as soon as possible, in any case within 30 days.

Last update: 02/04/2026