

## PRIVACY POLICY

In compliance with the mandatory requirements established by national law (Italian Legislative Decree dated June 30 2003, number 196, the Personal Data Protection Code, which was amended by Italian Legislative Decree 101/2018) and EU law (European Regulation 2016/679, GDPR) and subsequent amendments, this website respects and protects the privacy of visitors and users, making every possible and proportional effort not to infringe the rights of users. This privacy policy applies exclusively to the online activities of this website and is valid for visitors/users of the site. The purpose of the privacy policy is to provide maximum transparency regarding the information the website collects and how it uses it.

### COLLECTED DATA

This website collects and processes Personal Data, which is defined by the GDPR, either independently or through third parties, or provided voluntarily by the user, including:

- Internet protocol (IP) address; Browser type and parameters of the device used to connect to the site; Name of the internet service provider (ISP); Date and time of the visit; Visitor's web page of origin (referral) and exit; If applicable, the number of clicks. Cookies and Usage Data, which are collected by automated processes;

The above information is processed automatically and collected in an exclusively aggregate and pseudonymised form for the purpose of verifying the correct operation of the website and for security purposes; this information will be processed according to the legitimate interests of the data controller.

For security purposes (anti-spam filters, firewalls, virus detection), the data that is registered automatically may possibly also include personal data such as the IP address, which could be used, in accordance with the laws in force on the subject, in order to block attempts to damage the website itself or to cause damage to other users, or in any case harmful or criminal activities. Such data are never used for user identification or profiling, but only for the purpose of protecting the website and its users; such information is processed according to the legitimate interests of the data controller.

- Personal data, personal details (the "contacts" section) - the latter provided voluntarily by the user and do not determine the operation of the website.

The possible use of Cookies - or other tracking tools - carried out by this Website or by the holders of third-party services used by this Application, unless otherwise specified, is to provide the Service requested by the User, in addition to the additional purposes described in this document and the Cookie Policy, to which reference is made.

The User agrees to take responsibility for the Personal Data collected, published, or shared by third parties through this Application and guarantees to have the right to communicate or disseminate them, releasing the Data Controller from any liability towards third parties.

### METHODS OF PROCESSING

The Data Controller implements appropriate security measures to prevent unauthorised access, disclosure, modification, or destruction of Personal Data. The processing is executed using computerised and/or telematic instruments, with organisational methods and logic which are strictly related to the specified objectives. In addition to the Data Controller, in some cases, other internal or external subjects (such as third-party technical service providers, hosting providers, IT companies, and communication agencies) appointed as Data Processors by the Data Controller may have access to the Data.

### PROCESSING LOCATION

The data collected by the website are processed by the Data Controller and are exclusively processed by technical personnel authorised to perform the operations or appointed as External Data Processors pursuant to Article 28 EU Reg. 2016/679. The server hosting the website is located in Italy.

This website may share some of the collected data with services located outside the area of the European Union, in compliance with the rights and guarantees provided for by the regulations in force, pursuant to Articles 44 and subsequent articles of EU Reg. 2016/679.

### STORAGE PERIOD

Data are processed and stored for the time required by the purposes for which they were collected.

Personal Data collected for purposes related to the performance of the service requested by the User will be stored until the performance of such service is completed. With regard to any Personal Data collected for purposes based on the consent of the User, the Controller may keep the Personal Data longer until such consent is withdrawn.

As an additional measure, the Data Controller may be obliged to retain Personal Data for a longer period in compliance with a legal obligation or by order of an authority. At the end of the storage period, the Personal Data will be deleted. Therefore, after the expiry of this period, the right of access, deletion, correction, and the right to data portability are no longer available.

#### PURPOSES OF DATA COLLECTION

User Data is collected for the following purposes:

- to monitor the website framework;
- to contact the User in the event of contact requests from the User;

#### SECURITY MEASURES

This website processes user data in a lawful and correct manner, adopting appropriate security measures to prevent unauthorised access, disclosure, modification, or destruction of data. The processing is executed using computerised and/or telematic instruments, with organisational methods and logic strictly related to the declared purposes. In addition to the Data Controller, in some cases, categories of individuals involved in the organisation of the website or external subjects may have access to the data (such as third-party technical service providers, hosting providers, IT companies, and communication agencies).

#### RIGHTS OF THE USER

In relation to the personal data itself, the data subject may exercise the rights stipulated in Article 15 and subsequent articles of the GDPR, specifically:

**Right of access (Article 15)** - which is the right to be given confirmation from the data controller as to whether or not personal data relating to the data subject are being processed and, if this is the case, to be given access to this data and certain information (specified in the above-mentioned article) concerning the relevant data. **Right to rectification (Article 16)** - The right to rectification allows the data subject to amend his or her data if the data is inaccurate. **Right to erasure (Article 17)** - The possibility for the data subject to erase his/her own data held by the data controller when, for example, consent to processing is withdrawn or the purpose of processing is no longer required, or when it proves to be unlawful. Obviously, it will not always be possible to comply with the request for erasure. This is the case, for instance, when the data is required to fulfil a legal obligation or is necessary for the defence of a legal claim. **Right to object (Article 21)** - The right to oppose processing is guaranteed when the legal basis is a legitimate interest or the execution of a task of public interest. However, this right also is limited because there may be situations in which the legitimate interest of the data controller prevails over that of the data subject, and it is essential to achieve a fair balance, or if the processing is necessary for a task of public interest or the investigation, defence or exercise of a right before a judge. **Right to data portability (Article 20)** - it stipulates that, where a processing operation is based on contract or consent, in the event of a request, the data subject must be provided with his or her personal data in a structured, machine-readable format (JSON, XML, CSV); this right applies only to data provided spontaneously and does not apply to inferred or derived data.

**Right of revocation (Article 7)** - If any form of consent to the processing requested by the Data Controller has been signed, it should be noted that the data subject is entitled to revoke it at any time, without prejudice to the mandatory fulfilments envisaged by the legislation in force at the time of the revocation request, by contacting the Data Controller at the above-mentioned address, or by email, specifying the purpose of his/her request, the right he/she intends to exercise and attaching a photocopy of an identity document certifying the legitimacy of the request.

The data subject has the right to lodge a complaint with the competent supervisory authority in the Member State where he/she normally resides or works or in the State where the alleged infringement was committed.

All the aforementioned rights may be exercised by sending a request to the Data Controller through the contact channels indicated in this notice.

#### DATA CONTROLLER AND DATA PROTECTION OFFICER

The Data Controller is SORMEC S.R.L. with its registered office in Via degli Olmi, 10 - 31010 Godega di Sant'Urbano (TV) which can be contacted in writing at the following e-mail address: [sormec@sormec.it](mailto:sormec@sormec.it), or by telephone at +39 0438.434000.

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