

PRIVACY POLICY

Information provided pursuant to Reg.EU 2016/679 (GDPR), Art.13 and pursuant to Italian D.Lgs. 196/2003, as modified by D.Lgs. 101/18

1. GENERAL INFORMATION

The Data Subjects are informed of the following general profiles, valid for all areas of treatment:

- all the data of the subjects with whom we interface are treated in a lawful, correct and transparent manner, in compliance with the general principles set out in Art.5 of the GDPR;
- specific security measures are observed to prevent data loss, illicit or incorrect use and unauthorized access, pursuant to Article 32 of the GDPR.

References and rights of the Data Subjects:

- the Data Controller is the undersigned Organization, in person of the pro-tempore legal representative, to whom it is possible to contact to exercise all the rights foreseen by art.15- 21 of the GDPR (right of access, rectification, cancellation, limitation, portability, opposition), as well as revoke a previously granted consent; in case of failure to reply to their requests, the interested parties can propose a complaint to the Supervisory Authority for the protection of personal data (GDPR - Art.13, paragraph 2, letter d).

2) DATA PROCESSING RELATED TO THIS WEBSITE

Navigation Data

The information systems and software procedures relied upon to operate this web site acquire personal data as part of their standard functioning; the transmission of such data is an inherent feature of Internet communication protocols. Such information is not collected in order to relate it to identified data subjects, however it might allow user identification after being processed and matched with data held by third parties. This data category includes IP addresses and/or the domain names of the computers used by any user connecting with this web site, the URI (Uniform Resource Identifier) addresses of the requested resources, the time of such requests, the method used for submitting a given request to the server, returned file size, a numerical code relating to server response status (successfully performed, error, etc.), and other parameters related to the user's operating system and computer environment.

Purposes and lawfulness of processing (GDPR-Art.13, c.1, lett.c)	These data are only used to extract anonymous statistical information on website use as well as to check its functioning. The data might be used to establish liability in case computer crimes are committed against the website (Controller legitimate interest).
Scope of communication (GDPR-Art.13, c.1, lett.e,f)	The data may only be processed by internal personnel, duly authorized and instructed in the processing (GDPR-Art.29) or by the Processor of the web platform (appointed Data Processor, Art.28 GDPR) and will not be disclosed to other parties, disseminated or transferred to non-EU countries. Only in the case of an investigation they can be made available to the competent authorities.
Data retention (GDPR-Art.13, c.2, lett.a)	Data are usually kept for short periods of time, with the exception of any extensions connected to investigations.
Data provision (GDPR-Art.13, c.2, lett.f)	The data are not provided by the data subject but automatically acquired by the site's technological systems.

Specific services

The website may contain data collection forms designed to guarantee the user any services / features (eg: request information, registrations, etc.).

Purpose and legal basis of the processing (GDPR-Art.13, comma 1, lett.c)	The identification and contact data necessary to respond to the requests of the data subjects could be requested. The submission of the request is subject to specific, free and informed consent (GDPR-Art.6, comma1, lett.a).
Scope of communication (GDPR-Art.13, paragraph 1, lett.e, f)	The data are processed exclusively by authorized and trained personnel (GDPR-Art.29) or by any persons responsible for maintaining the web platform or providing of the service (appointed in this case external managers). The data will not be disclosed or transferred to non-EU countries.
Data retention period (GDPR-Art.13, paragraph 2, letter a)	Data are kept for times compatible with the purpose of the collection.
Data provision (GDPR-Art.13, comma 2, lett.f)	The provision of data related to the mandatory fields is necessary to obtain an answer, while the optional fields are aimed at providing the staff with other useful elements to facilitate contact.

Data provided voluntarily by users

Sending e-mail messages to the addresses mentioned on this website, which is done on the basis of a freely chosen, explicit, and voluntary option, entails acquisition of the sender's address, which is necessary in order to reply to any request, as well as of such additional personal data as is contained in the message(s). The sender who gives his curriculum to submit his job application remains the only responsible for the relevance and accuracy of the data sent. It should be noted that any curriculum without the data processing consent will be immediately deleted.

3) DATA PROCESSING CONNECTED TO THE RELATIONSHIPS WITH CUSTOMERS AND SUPPLIERS

3.1 Object of the processing

The Company processes personal identifying data of customers / suppliers (for example, name, surname, company name, personal / fiscal data, address, telephone, e-mail, bank and payment details) and its operative contacts (name surname and data contact information) acquired and used for managing the services provided by the Company.

3.2 Purposes and legal basis of the processing

Data are processed to:

- manage contractual / professional agreements, as well as manage the necessary communications connected to them;
- fulfill the obligations established by law, by a regulation, by the community legislation or by an order of the Authority;
- exercise a legitimate interest of the Controller (for example: the right of defense in court, the protection of credit positions; the ordinary internal operating, management and accounting needs).

Failure to provide the aforementioned data will make it impossible to establish the relationship with the Controller. The aforementioned purposes represent, pursuant to Article 6, commas b, c, f, suitable legal bases for the lawfulness of the processing. If it is intended to carry out treatments for different purposes, it will be required a specific consent from the data subjects.

3.3 Methods of the processing

The processing of personal data is carried out by means of the operations indicated in Art. 4 n. 2) GDPR and exactly as: collection, registration, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, deletion and destruction of data. Personal data are subjected to both paper and electronic and / or automated processing. The Data Controller will process personal data for the time necessary to fulfill the purposes for which it was collected and related legal obligations.

3.4 Scope of the processing

The data are processed by internal regularly authorized subjects and instructed pursuant to Article 29 of the GDPR. It is also possible to request the scope of communication of personal data, obtaining precise indications on any external subjects operating as managers or independent data controllers (consultants, technicians, banks, transporters, etc.).

4) POLICY UPDATING

It should be noted that this information may be subject to periodic review, also in relation to the relevant legislation and jurisprudence. In the event of significant changes, appropriate evidence will be given in the home-page of the site for a suitable time. In any case, the interested party is invited to periodically consult the present policy.