# Information on the processing of personal data

# Articles 13 and 14 of Regulation 2016/679/EU (hereinafter also "GDPR")

### Why this notice

IMASAF PRO s.r.l. (hereinafter also "Company" or "Data Controller") is committed to the respect and protection of your privacy and wants you to feel safe both while simply browsing the site and in case you decide to register by providing us with your personal data in order to respond to the contact/information request forwarded or to take advantage of the services/products made available to its Users and/or Customers. On this page IMASAF PRO S.R.L. intends to provide some information on the processing of personal data relating to users who visit or consult the website accessible by electronic means from the address www.imasaf.it (the "Site"). The information is provided only for the website of IMASAF PRO S.R.L. and not also for other websites that may be consulted by the user through links (for which please refer to the respective information/policies on privacy). The reproduction or use of pages, materials and information contained within the Site, by any means and in any medium, is not permitted without the prior written consent of IMASAF PRO s.r.l. Copying and/or printing for personal and non-commercial use only is permitted (for inquiries and clarifications, please contact IMASAF PRO S.R.L. at the contact information below). Other uses of the content, services and information on this site are not permitted.

With respect to the content offered and the information provided, IMASAF PRO S.R.L. will endeavor to keep the contents of the Site reasonably up-to-date and revised, without offering any warranty as to the adequacy, accuracy or completeness of the information provided by expressly disclaiming any liability for any errors of omission in the information provided on the Site.

#### **Origin - Navigation data**

IMASAF PRO S.R.L. informs you that the personal data provided by you and acquired at the same time as the request for information and/or contact, registration to the site and use of services through smartphones or any other tool used to access the Internet, as well as the data necessary for the provision of such services, including navigation data and data used for the possible purchase of products and services

offered by IMASAF PRO S.R.L. but also only the so-called "navigation" data of the site by Users, will be processed in accordance with applicable regulations. The computer systems and software procedures used to operate this website acquire, during their normal operation, some personal data whose transmission is implicit in the use of the Internet. This is information that is not collected in order to be associated with identified interested parties, but which by its very nature could, through processing and association with data held by third parties, make it possible to identify navigating users. This category of data includes the "IP addresses" or domain names of the computers used by users who connect to the site, the addresses in URI (Uniform Resource Identifier) notation of the resources requested, the time of the request, the method used in submitting the request to the web server, the size of the file obtained in response, the numerical code indicating the status of the response given by the web server (successful, error, etc.) and other parameters relating to the user's operating system and computer environment. This data is used for the sole purpose of obtaining anonymous statistical information on the use of the site and to check the correct functioning of the IMASAF PRO S.R.L. website. It should be noted that the aforementioned data could be used to ascertain responsibility in case of computer crimes to the detriment of the IMASAF PRO S.R.L. site or other sites connected or linked to it: except for this eventuality, at present the data on web contacts do not persist for more than a few days.

#### Origin - Data provided by the user

IMASAF PRO S.R.L. collects, stores and processes your personal data for the purpose of responding to the contact/information request forwarded or in order to take advantage of the services/products made available to its Users and/or Customers, or for obligations by Law. With regard to some specific Services, Products, Promotions, etc. IMASAF PRO S.R.L. may also process your data for commercial purposes. In such cases, a specific, separate, optional and always revocable consent will be requested in the manner and at the addresses indicated below. The optional, explicit and voluntary sending of electronic mail to the addresses indicated in the appropriate section of the Website, as well as the filling in of questionnaires (e.g. forms), communication via chat, push notification via APP, social networks, call centers, etc., implies the subsequent acquisition of some of your personal data, including those collected through the use of Apps and related services, necessary to respond to your requests. We also point out that when using your mobile connection to access content and digital services offered directly by IMASAF PRO S.R.L. or by our Partners, it may be necessary to transfer your personal data to such third parties. We highlight that you may access

the Site or connect to areas where you may be enabled to post information using blogs or message boards, communicate with others, for example by coming from IMASAF PRO S.R.L.'s page on Facebook<sup>®</sup>, LinkedIn<sup>®</sup>, Youtube<sup>®</sup>, and other social networking sites, review products and offers, and post comments or content. Before interacting with these areas, we encourage you to carefully read the General Terms of Use keeping in mind that, under certain circumstances, the information you post can be viewed by anyone with access to the Internet and any information you include in your postings can be read, collected, and used by third parties.

# Purpose of processing and legal basis

Data are processed for the purposes:

1) strictly related to and necessary for the registration to the website www.imasaf.it , the services and/or Apps developed or made available by IMASAF PRO S.R.L., the use of related information services, the management of requests for contact or information, to access the products offered through the website www.imasaf.it

2) for activities related to the management of User/Customer requests and the sending of feedback that may include the transmission of promotional material;

3) related to the fulfillment of obligations under EU and national regulations, protection of public order, detection and suppression of crimes;

4) direct marketing, i.e. sending advertising material, direct sales, carrying out market research or commercial communication of products offered by IMASAF PRO S.R.L. ; this activity may be carried out by sending advertising/informative/promotional material and/or invitations to participate in initiatives, events and offers aimed at rewarding users/customers, carried out by "traditional" means (by way of example, paper mail and/or operator calls), or by "automated" contact systems (by way of example, SMS and/or MMS, telephone calls without operator intervention, e-mail, fax, interactive applications), pursuant to art. 130 c. 1 and 2 of Legislative Decree 196/03, as amended;

The provision of data for the purposes referred to in points 1), 2) and 3), connected to a pre-contractual and / or contractual phase or functional to a user request or provided for by a specific regulatory provision, is mandatory and, failing that, it will not be possible to receive information and access to products / services that may be required; with regard to point 4) of this Information Notice, the consent to the processing of data by the user / customer is instead free and optional and always revocable without consequences on the usability of products and services except the impossibility for IMASAF PRO S. R.L. to keep users/customers updated on new initiatives or special promotions or benefits that may be available.

IMASAF PRO S.R.L. may send you commercial communications relating to events and/or services similar to those already provided, in accordance with Directive 2002/58/EU, using the e-mail, or paper coordinates, indicated by you on such occasions to which you may object in the manner and at the contact details below.

## Methods, processing logic, storage times and security measures

The processing is also carried out with the aid of electronic or otherwise automated means and is performed by IMASAF PRO S.R.L. and/or third parties that IMASAF PRO S.R.L. may use to store, manage and transmit the data. The data processing will be carried out with logics of organization and processing of your personal data, also related to the logs originated from the access and use of the services made available via web, products and services used related to the purposes indicated above and, in any case, in such a way as to ensure the security and confidentiality of the data. The personal data processed will be kept for the period of time prescribed by the legislation applicable at the time.

Precisely with reference to the aspects of protection of personal data, the user/customer is invited, pursuant to Article 33 of the GDPR to report to IMASAF PRO S.R.L. any circumstances or events from which a potential "personal data breach (data breach)" may arise in order to allow an immediate assessment and the adoption of any actions to counter such an event by sending a communication to privacy@imasaf.it The measures taken by IMASAF PRO S. R.L. do not exempt the User from paying the necessary attention to the use, where required, of passwords/PINs of appropriate complexity, which he/she will have to update periodically, especially in case he/she theme have been violated/known by third parties, as well as carefully guard them and make them inaccessible to third parties, in order to avoid improper and unauthorized use.

#### Areas of communication and transfer of data.

For the pursuit of the above purposes, IMASAF PRO S.R.L. may communicate and have processed, the personal data of users/customers to third parties with whom we have relationships, where these third parties provide services at our request. We will only provide these third parties with the information necessary to perform the requested services taking all measures to protect your personal data. In the case of using services offered directly by Partners we will provide only the data strictly necessary for their performance. In any case, only the data necessary for the pursuit of the intended purposes will be disclosed, and the safeguards applicable to data transfers to third countries will be applied where required. We may also disclose personal data to our commercial service providers, for marketing reasons, who are appointed as external data processors for this purpose. In addition, personal data may be disclosed to the competent public entities and authorities for the needs of compliance with regulatory obligations or for the ascertainment of responsibility in case of computer crimes to the detriment of the site as well as disclosed to, or allocated at, third parties (as managers or, where they are providers of electronic communication services, as autonomous controllers), who provide computer and telematic services (ex. : hosting services, website management and development) and of which IMASAF PRO S.R.L. avails itself for the performance of tasks and activities of a technical and organizational nature also instrumental to the functioning of the website. The subjects belonging to the above categories operate as separate Data Controllers or as Managers appointed for this purpose by IMASAF PRO S.R.L.

Personal data may, in addition, be known by employees/consultants of IMASAF PRO S.R.L. who are specially trained and appointed as Data Processors.

The categories of recipients to whom the data may be disclosed is available by contacting IMASAF PRO S.R.L. at the addresses below.

#### **Rights of data subjects**

You may exercise at any time the rights granted to you by law, including that:

(a) to access your personal data, obtaining evidence of the purposes pursued by the Data Controller, the categories of data involved, the recipients to whom the data may be communicated, the applicable retention period, the existence of automated decision-making processes;

b) to obtain without delay the rectification of inaccurate personal data concerning him/her;

c) to obtain, in the cases provided for, the cancellation of your data;

d) to obtain the limitation of the processing or to object to the same, when possible;

e) to request the portability of the data that you have provided to IMASAF PRO S.R.L., i.e. to receive them in a structured, commonly used and machine-readable format, including for the purpose of transmitting such data to another data controller, within the limits and with the constraints provided for in Article 20 of the GDPR;

In addition, it may lodge a complaint with the Data Protection Authority pursuant to Article 77 of the GDPR.

For the processing referred to in point 4) of the purposes, the User will always be able to revoke consent and exercise the right to object to direct marketing (in "traditional" and "automated" form). Opposition, in the absence of any indication to the contrary, will refer to both traditional and automated communications.

# **Owner and Data Controller**

The Owner and Data Controller, pursuant to the GDPR, is **IMASAF PRO S.R.L. VIA ROMETTA N. 71 -**CITTADELLA (PD), PIVA: 05334410288.

The aforementioned rights may be exercised upon request by the Data Subject in the manner made known on the Company's website or by using the following references: IMASAF PRO S.R.L. (privacy@imasaf.it). The use of the Web Site, including those intended for tablets and/or smartphones, by the Client and/or User implies full knowledge and acceptance of the content and any indications included in this version of the notice published by IMASAF PRO S.R.L. at the time the site is accessed. This policy may be modified without notice and therefore periodic reading is recommended.

The Owner and Data Controller IMASAF PRO S.R.L.

Having acquired the above information, by signing this notice you consent to any processing, as well as to the communication and dissemination of your personal data, including sensitive data, collected up to this point, for the purposes described above and within the above limits. Cittadella, there \_\_\_\_\_\_

For received communication and given consent

He/she also consents to the sending of informative sms and/or e-mails to the contact details provided to IMASAF PRO S.R.L. during the identification phase and for the purposes described above, as well as the subscription to IMASAF PRO S.R.L. newsletters also for participation in future initiatives (e.g. events, prize competitions, demonstrations, etc.).

This consent is valid until revoked in writing to be sent by registered letter with return receipt, fax, pec or email to the contact details at the bottom or to the e-mail address privacy@imasaf.it (consent not necessary for the execution of the contract).

Pursuant to the provisions of Art. 21, co. 2° we inform you that: "where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to the processing of personal data concerning him or her carried out for such purposes, including profiling insofar as it is related to such direct marketing," and that pursuant to co. 3°: "where the data subject objects to the processing for direct marketing purposes, the personal data shall no longer be processed for such purposes."

Cittadella, there \_\_\_\_\_

For received communication and given consent