

## ***Privacy policy***

This communication is made available to you - also pursuant to Article 13 of Legislative Decree 30/06/06 n. 196 (Privacy Code) and Articles 13 and 14 of the European Regulation of the protection of personal data (GDPR) 2016/679, and subsequent amendments and additions – from Euro Commerciale S.r.l. with legal address in Prato (PO), via Rimini n.7, and head office in Agliana (PT), via G. Matteotti n. 200, as Data Controller of your personal data.

The purpose of this information notice is to inform the user about the methods of processing personal data concerning him.

### **Type of data processed**

The website offers informative and sometimes interactive content. While browsing the site [www.eurocommercialespa.com](http://www.eurocommercialespa.com) can, therefore, acquire information about the visitor, in the following ways:

#### Navigation data

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 internet communication protocols. This category of data includes: the IP address, the type of browser used, the operating system, the domain name and the addresses of websites from which it was accessed, information on pages visited by users within of the site, the access time, the stay on the single page, the internal path analysis and other parameters relating to the operating system and computer environment.

#### Further categories of data

This is all personal data provided by the visitor through the site, for example, by registering and/or accessing to a reserved area and/or a service and/or participating in one of the initiatives of Euro Commerciale Srl, by writing to an e-mail address of Euro Commerciale Srl, to request information, or by calling our toll-free number to get direct contact with customer service.

#### Or

This is all personal data provided by the visitor through the site, for example:

- By filling out a form by which you can request an estimate and/or information on the services offered and/or contact request;
- By writing to the e-mail addresses indicated on our site to request information;

- By accessing a reserved area and/or a service;
- By filling in a form by which you can submit your curriculum vitae;
- By filling out a form to receive our newsletter and marketing communications;
- By filling out a form to register for one of the Euro Commerciale Srl initiatives (conferences, seminars, workshops, events).

### **Purpose of the treatment**

The data provided are processed for the following purposes:

- Recognize the experience of use of our platforms, products and services that we offer and ensure the proper functioning of the web pages and their contents. The treatments put in place for these purposes are based on a legitimate interest of the Data Controller;
- Provide the good and/or service requested by the user, manage the contracts perfected by the user, carry out the administrative procedures, accounting, tax and legal requirements, as well as fulfill the requests submitted by the user. The treatments put in place for these purposes are necessary for the fulfillment of contractual obligations and do not require specific consent from the interested party.
- Send commercial communications relating to promotions and/or offers, in the interest of the Data Controller; the processing for these purposes are carried out with the specific consent provided by the user.

### **Sharing and transfer of personal data**

The data collected by Euro Commerciale Srl will be shared only for the purposes mentioned above; we will not share or transfer your personal data to third parties other than those indicated in this Privacy Policy.

During our activities and exclusively for the same purposes as those listed in this Privacy Policy, your personal data may be transferred to the following categories of recipients:

- Company staff;
- Service provider (etc. IT system providers, cloud service providers, database vendors and consultants)
- Public Administration for law purposes;
- Every public and/or private subject to whom it is necessary to communicate your personal data in relation to the purposes indicated above.

The updated list of Processors is available at controller's legal address and it will be provided with a prior written application.

Euro Commerciale Srl may have to transfer your personal data to countries situated outside the European Union/European Economic Area (EEA), so called “third-country”. These transfers to third countries can include all the activities above indicated.

This Privacy policy also applies in the event of data being transferred to third countries where the level of data protection is different from that of the European Union. In particular, the data can be internationally transferred in the following situation:

a) Group company: the group company based outside the Europe have subscribed data protection agreement using contractual terms in accordance with the European Commission standards for purposes of protecting your privacy and justify international transfer of data.

b) Third country outside the European Union/EEA: any transfer of personal data to third country will be made after informing you and receiving the consent. Any transfer of data to other countries than those which the European Commission has taken an adequacy decision is based on agreements that use standard contractual clauses adopted by the European Commission or other appropriate guarantees in compliance with applicable laws.

Or (if not group extra UE)

This Privacy Policy is also applicable in the case of transfer of data to third countries where the level of data protection is different from that of the European Union: any transfer of personal data to third parties will be made only after you have informed and, if requested, after receiving your consent.

Any transfer of data to countries other than those for which the European Commission has taken an adequacy decision is based on agreements that use standard contractual clauses adopted by the European Commission or other appropriate guarantees in compliance with applicable laws.

**Protection of personal data**

Euro Commerciale Srl have implemented appropriate technical and organizational measures to provide an appropriate level of security and privacy to personal data.

These measures concerning:

- Technology;
- His implementation;
- Nature of the data;
- The risk of processing.

The aim is to protect the data against any accidental or illicit destruction, accidental loss, unauthorized disclosure or access and other form of illegal processing.

Also, when Euro Commerciale Srl manages the data:

- Collects and processed data that are adequate, relevant and not excessive, as required to satisfy the aforementioned purposes;
- Ensure that the data are accurate and kept up to date.

### **Storage periods**

Euro Commerciale Srl will maintain your personal data for no longer than is necessary for the purposes for which the personal data are processed, except your right to object to data processing or the right to be forgotten.

The retention period is the time of their actual use, plus the period of time until the legal claims become prescribed. When the period will expire, your personal data will be removed from active system of Euro Commerciale Srl.

### **Your right**

Your rights are:

- **RIGHT TO RECTIFICATION.** You have the right to obtain from Euro Commerciale Srl the rectification of personal data concerning you. Euro Commerciale Srl shall make reasonable efforts to ensure that the personal data in its possession are accurate, undated and relevant.
- **RIGHT TO RESTRICTION OF PROCESSING.** You can obtain restriction of processing your personal data if:
  - The accuracy of the personal data is contested by the data subject, during the period when Euro Commerciale Srl must verify its accuracy;
  - The processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
  - Euro Commerciale Srl no longer needs the personal data for the purposes of the processing, but they are required by the data subject to establishment, exercise or defend your rights in court or
  - The data subject has objected to processing, while Euro Commerciale Srl checks whether your legitimate reasons prevail over your own.

- **RIGHT TO ACCESS.** You have the right to obtain from Euro Commerciale Srl information about your personal data, and also information on which categories of personal data Euro Commerciale Srl owns or controls, for what purpose they are used and where they were collected.
- **RIGHT TO DATA PORTABILITY.** As a result of your application, Euro Commerciale Srl will transmit the data to another Controller on condition that the processing is based on consent or on a contract.
- **RIGHT TO ERASURE,** Unless the processing of data is necessary for compliance with a legal obligation or to establishment, exercise or defend legal claims. The data subject shall have the right to obtain from Euro Commerciale Srl the erasure of personal data if:
  - the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
  - you opposed to the processing of your personal data;
  - the personal data have been unlawfully processed.
- **RIGHT TO OBJECT.** The data subject shall have the right to object at any time to processing of personal data, on the condition that the data processing is not based on your consent but on the legitimate interest of Euro Commerciale Srl or third party. Euro Commerciale Srl shall no longer process the personal data unless the Controller demonstrates mandatory and legitimate reasons for the processing, an overriding interest in treatment, or the exercise or defend of legal claims. When you object to processing, specify if you're going to erasure your personal data or limiting the processing.
- **RIGHT TO LODGE A COMPLAINT.** Every data subject shall have the right to lodge a complaint with a supervisory authority, in particular in the Member State of his/her habitual residence, place of work or place where the alleged infringement took place.

### **Amendments to this Privacy Policy**

Any future changes or additions to the processing of personal data as described in this privacy policy will be notified in advance through an individual notification, through the usual communication channels used by Euro Commerciale Srl (etc. e-mail or through the internet).

**Data Controller and Processor**

To exercise their rights under Article 7 of Privacy Code and Articles 15 ss. of Privacy Regulation, you can contact the Controller Euro Commerciale Srl with legal address in Prato (PO), via Rimini n.7 and head office in Agliana (PT), via G. Matteotti n. 200, Referent Mr. Simone Mezzei, phone +39 0574 440706-440802, e-mail [privacy@eurocommercialespa.com](mailto:privacy@eurocommercialespa.com).