

## **INFORMATION ON THE PROCESSING OF PERSONAL DATA**

Dear User,

This information has been drawn up according to Article 13 of EU Regulation 2016/679 on the protection of personal data, taking into account Recommendation number 2/2001 adopted 17 May 2001, for users accessing all Effegibi websites and relating to all the personal data of users collected and held by the Data Controller.

The information relates to the website [www.effegibi.it](http://www.effegibi.it) and all other Effegibi websites and applications, but not to other websites and/or applications that may be consulted by users via links to external third-party web pages.

### **DATA CONTROLLER**

The Data Controller is the company Effegibi Srl, registered office address: Via Gallo n. 769 – Borello (FC), VAT number: 03914050400, Tel: +39 0547 372881, E-mail address: [info@effegibi.it](mailto:info@effegibi.it).

Further information may be obtained by contacting the Data Controller at any time at the above contact points.

### **DATA COLLECTED**

The personal data may be provided directly by the data subjects or, in the case of usage data, collected automatically during access to and navigation of the website. Users assume all responsibility for the accuracy and truth of the data they provide and, if relevant, guarantee that they have the right to communicate third-party data, freeing the Data Controller from all liability.

## **PERSONAL DATA PROCESSING DETAILS**

### **1. Dealing with requests for information, assistance or contact**

Sending optional, explicit or voluntary messages to one or more of the Data Controller's contact addresses, will result in the acquisition of the sender's contact details as necessary to respond to the message, and also all the personal data included in the message.

The purpose for which data of those types are processed is to deal with requests for information, assistance or any other request made to the Data Controller at the addresses made available on the website.

The legal basis for the processing is in order to execute a contract entered into by the data subject or for pre-contractual arrangements made at the request of that person. Provision of the personal data for the above purpose is optional but failure to provide the data may render it impossible to deal with the request for information or support.

### **2. Management of requests sent via the Contact Us section**

By filling in the appropriate sections in the Contact Us webpage, users may send requests for information or request an appointment, providing such personal data directly as their name, e-mail address, telephone number and city.

Such types of data are processed in order to deal with requests for information, assistance or any other request made to the Data Controller at the addresses made available on the website.

The legal basis for the processing is in order to execute a contract entered into by the data subject or for pre-contractual arrangements made at the request of that person. Provision of the personal data for the above purpose is optional but failure to provide the data may render it impossible to deal with the request for information or support.

### **3. Receipt and management of curriculum vitae**

Users may also send their curriculum vitae to the above contact points in order to apply for job positions, including if these are unadvertised. The Data Controller will keep such personal data received for 24 months, contacting the data subject if a working position compatible with the user's CV becomes available.

Data of this type is processed in order to deal with and assess CVs sent to the Data Controller.

The legal basis for the processing is in order to make pre-contractual arrangements for establishing any subsequent working relationship. Provision of the personal data for the above purpose is optional but failure to provide the data may render it impossible to deal with the request.

### **4. Registration of product guarantees**

By filling in the appropriate section on the page entitled Guarantee Registration, users may activate the guarantee for their product, by directly providing such personal information as their first and surnames, postal and e-mail address and telephone number.

Data of this type is processed in order to deal with requests made to the Data Controller.

The legal basis for the processing is in order to execute a contract entered into by the data subject or for pre-contractual arrangements made at the request of that person. Provision of the personal data for the above purpose is optional but failure to provide the data may render it impossible to deal with the request.

### **5. Area Pro registration and authentication**

Users accessing the Area Pro web page will fill in the form and enter the required data.

Such registration gives users' consent to the website to identify them and thus gain access to such services as downloading the documents listed on the product pages, including technical specifications, 3D illustrations, catalogues, etc.

Data of this type is processed in order to deal with registered users and to identify them to enable them to access certain documents.

The legal basis for the processing is in order to execute a contract entered into by the data subject or for pre-contractual arrangements made at the request of that person. Provision of the personal data for the above purpose is compulsory and failure to provide the data or incorrect provision will render it impossible for users to complete registration and access the services in question.

### **6. Promotional and business communications sent by automated means**

Users may consent to the receipt of promotional, business and informative communications at the addresses given, to receive promotional, business and informative communications on the products and services made available by the Data Controller.

Data of this type is processed in order to send out promotional and business communications by e-mail or other automated means.

The legal basis for the processing is users' consent given in order for them to sign up to specific and further services such as sending out future informative and promotional communications. Users have the right to withdraw their consent at any time, without prejudice to the legitimacy of any processing carried out before consent was withdrawn and without such withdrawal having any prejudicial consequences for the data subject.

### **7. Statistical information and checks on service functionality**

Navigating the website allows the Data Controller to collect certain data automatically, known as navigation data. The IT systems and software procedures installed to enable this website to function acquire, over the course of their normal operations, some personal data whose transmission is implicit in the use of internet communications protocols. Such information is not collected in order to be associated with identified data subjects but, by its very nature, when processed and associated with data held by third parties or by the Data Controller, it may make it possible to identify the users. This category of data includes the IP addresses or the domain names of users' computers with which they connect to the website, the URI notation addresses of the resources requested, the timing of the request, the method used to make the request to the server, the numeric code indicating the status of the response given by the server (successful outcome, error, etc.) and other operating system parameters and users' IT environment.

Data of this type is processed in order to collect aggregated statistical information on the use of the services (most visited pages, number of visitors per day or per time of day, geographic area of origin, etc.) and to check that the website and the services available are functioning correctly.

The legal basis for the processing is in order to execute a contract entered into by the data subject or for pre-contractual arrangements made at the request of that person, and for which the consent given by the user can always be withdrawn. Such data collected automatically through website navigation and the provision of such data are compulsory in order to access the site and the services available on it.

### **RECIPIENTS**

The data of a personal nature provided may be communicated to suitably appointed recipients who will process the data as appointed and/or approved processors.

In particular, data subjects' personal data may be communicated to recipients belonging to the following categories: competent authorities in order to fulfil legal obligations and/or the requirements of public bodies, on request; companies providing IT equipment repair and/or maintenance services; companies managing the website and, more generally, to allow providers to perform technical, logistic and other types of activity on our behalf. Our providers only have access to those personal data necessary for them to perform their particular duties and they undertake not to use the data for other purposes and to process the data in compliance with current regulations.

In all circumstances, the personal data processed will not be broadcast.

A complete list of the data processors and those appointed to process the data may be requested by sending a message to the-mail address [info@effegibi.it](mailto:info@effegibi.it).

If the personal data are transferred outside the EU for technical operational reasons and to guarantee good continuity of service, the Data Controller gives an assurance that the transfer will be made on the basis of an adequacy decision of the Commission, in order to ensure that the level of protection of physical persons guaranteed by current regulations and in particular by EU Regulation 2016/679 is not prejudiced.

### **PROCESSING METHODS**

The personal data are processed by both automated and manual equipment for the time strictly necessary to achieve the purpose for which they have been collected.

In particular, the personal data collected are stored for a set period of time taking into account such criteria as the duration of any user's interest in receiving promotional and/or business offers, or to establish a subsequent contractual relationship. All further information on the storage time and criteria can be requested by contacting the Data Controller.

Specific security measures are taken to prevent the loss of the data, their illegal or incorrect use and unauthorised access to them.

### **DATA SUBJECTS' RIGHTS**

Pursuant to Articles 15 – 22 of EU Regulation 2016/679 all data subjects have a set of rights.

**Right of access:** pursuant to Article 15, data subjects have the right to obtain from the Data Controller confirmation as to whether or not personal data concerning them are being processed, and, where that is the case, to obtain a copy. They also have the right of access to the personal data concerning them and to obtain such further information as the purposes, the categories of recipients, the storage period for the data and the rights that may be exercised.

**The right to rectification:** pursuant to Article 16, they have the right to have inaccurate data concerning them rectified or added to.

**The right to erasure:** data subjects have the right to have personal data concerning them erased, without undue delay, where any of the grounds in Article 17 apply.

**Right to restriction of processing:** in the circumstances stated in Article 18 of Regulation 2016/679, data subjects have the right to restrict processing.

**Right to data portability:** data subjects have the right to receive the personal data concerning them in a structured, commonly used and machine-readable format, and they have the right to transmit those data to another controller without hindrance, according to the provisions of Article 20 of Regulation 2016/679.

**The right to object to the processing:** data subjects have the right to object to the processing of personal data concerning them according to the provisions of Article 21 of Regulation 2016/679.

Data subjects also have the right to lodge a complaint with the Supervisory Authority for privacy protection.

Any requests made under the above conditions must be made in writing to the Data Controller. The Data Controller will, within the time limit set by current regulations, provide a prompt response to any request to exercise data subjects' rights.

Any clarification or request for clarification can be made in writing to the Data Controller, also by filling in the form available on this link

<https://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/1089924>

### **UPDATES AND MODIFICATIONS**

The Data Controller reserves the right to make periodic modifications, updates or additions to this information in compliance with the applicable regulations or the provisions adopted by the Supervisory Authority acting as guarantor of personal data protection.

Data subjects will be informed of the aforesaid modifications or additions by e-mail and by links to the Privacy Policy page on this website.

All data subjects are invited to view the Privacy Policy regularly to check for any information updates.