

This statement regarding the privacy policy and the protection of your personal data (called Privacy Policy or Privacy Statement) will enable you to learn how pellinindustrie.net uses and manages the information you provide, your personal data and any sensitive data which will be collected by the website <http://pellinindustrie.net> in order to be able to offer the services you require.

Following the procedures provided by the website through which the user can communicate with pellinindustrie.net providing their personal data (hereinafter generically called "contact modes"). Later in this document, it describes in detail the individual contact modes. To go directly to the description of the individual contact mode click on his name below.

#### **Contact modes provided by the website <http://pellinindustrie.net>**

This statement will also explain your options and rights regarding the data provided, without which pellinindustrie.net may be unable, in part or entirely, to offer you its services.

This statement also draws on Recommendation no. 2/2001 which the European Authorities for the protection of personal data, in the Working Group established by Article 29 of Directive no. 95/46/CE, adopted on 17 May 2001 to determine some minimum requirements regarding the collection of personal data online, and, in particular, the methods, timeframes and nature of the information that data controllers must provide to users when they connect to websites, regardless of their reasons for connecting.

#### **Statement regarding the processing of personal data as per article 13 of the EU Regulation 2016/679 and subsequent amendments**

We wish to inform you that the **EU Regulation 2016/679** (General Data Protection Regulation) provides for and ensures the right to the protection of personal data that are subject to processing by third parties by virtue of the principle that everyone has the right to the protection of their personal data and to have that data processed in compliance with fundamental rights and freedoms, with respect for the dignity of the interested party, in particular with regards to confidentiality and personal identity.

For the purposes of this information and the European Regulation we mean:

1. "form", indicates the interface of a site web or an application that allows the client user to enter and send to the web server one or more data freely entered by the same;
2. "data processing" means any operation or set of operations performed with or without the aid of automated processes and applied to personal data or sets of personal data, such as the collection, registration, organization, structuring, preservation, adaptation or modification, extraction, consultation, use, communication by transmission, diffusion or any other form of making available, comparison or interconnection, limitation, cancellation or destruction;
3. "personal data" means "personal data": any information concerning an identified or identifiable natural person ("concerned"); an identifiable natural person can be identified, either directly or indirectly, with particular reference to an identifier such as a name, an identification number, location data, an online ID or one or more characteristic elements of his physical identity, physiological, genetic, psychological, economic, cultural or social;
4. «archive»: any structured set of personal data accessible according to certain criteria, regardless of whether the set is centralized, decentralized or broken down in a functional or geographical manner;
5. «data controller»: the natural or legal person, public authority, service or other body which, individually or together with others, determines the purposes and means of processing personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or specific criteria applicable to his designation may be established by Union or Member State law;
6. 'controller': the natural or legal person, public authority, service or other body that processes personal data on behalf of the controller;
7. 'recipient' means a natural or legal person, public authority, service or another body that receives personal data, whether it is a third party or not. However, public authorities that may receive disclosure of personal data in the context of a specific investigation in accordance with Union or Member State law are not considered to be recipients; the processing of such data by these public authorities complies with the applicable data protection rules according to the purposes of the processing;
8. 'third party' means a natural or legal person, public authority, service or other body other than the person concerned, the controller, the controller and the persons authorized to process personal data under the direct authority of the owner or manager;
9. «violation of personal data»: the security breach that involves accidental or unlawful destruction, loss, modification, unauthorized disclosure or access to personal data transmitted, stored or otherwise processed;
10. 'genetic data' means personal data relating to the hereditary or acquired genetic characteristics of a natural person providing unambiguous information on the physiology or health of that natural person, and which result in particular from the analysis of a biological sample of the natural person in question;
11. 'biometric data' means personal data obtained from specific technical processing relating to the physical, physiological or behavioral characteristics of a natural person which permit or confirm their unambiguous identification, such as facial image or dactyloscopic data;
12. 'health data' means personal data relating to the physical or mental health of a natural person, including the provision of health care services, which reveal information relating to his or her state of health;

In compliance with the aforementioned regulations and principles, the processing that we will perform on the data you provide us will be characterized by principles of lawfulness, fairness and transparency, and will be carried out with due regard for the principle of need in data processing: our systems and computer programmes will be set up so that the use of personal and identifying data is reduced to a minimum, so as to prevent processing when the pursued goals, in each individual case, can be achieved using anonymous data and appropriate methods that enable you to be identified only when necessary, respectively.

#### **Controller of the personal data**

pellinindustrie.net  
Pellini S.p.A. via Fusari 19, 26845 Codogno (LO) ITALY  
P. IVA: IT09048540158

#### **Information collected by the website <http://pellinindustrie.net> and therefore by pellinindustrie.net**

While using the website <http://pellinindustrie.net> you will be given the chance to contact pellinindustrie.net electronically and non-electronically.

Regarding the information that may be requested of you or that will be voluntarily provided, we wish to inform you that the provision of data may be optional in some cases and in others, however, required; and in such cases, any refusal to provide such data could prevent the operation from being carried out in part or entirely.

The data processing may also regard personal data that in some countries fall under the category of "sensitive data" as defined above; consequently, pellinindustrie.net will adopt all the due caution and measures required by the EU Regulation 2016/679.

Below we listed the contact modes through which the website <http://pellinindustrie.net> may collect your personal information or through whom you may contact directly pellinindustrie.net providing the same personal data. Such information can be obtained directly from the website <http://pellinindustrie.net> through services prepared and managed directly by pellinindustrie.net or acquired from third-party services. For each contact modes below information detailed in order to point who acquires your information, what are the purposes for which they are collected and, in the case of transfer to third parties, it will report the possible categories of third parties to whom the data will be transferred.

#### **Contact modes proposed by the website through which you will be providing your personal information:**

## **TELEPHONE, FAX, EMAIL AND POSTAL ADDRESS**

### **- SUPPLIER-MANAGER OF THE CONTACT MODE**

The service is provided and managed directly by this application.

### **- TRANSFER OF DATA TO THIRD PARTIES**

The data collected by this service will not be transferred to third parties.

### **- SERVICE DESCRIPTION**

Browsing the site you will find our telephone numbers, fax, email and postal addresses to be able to get in touch with us.

## **REQUEST INFORMATION**

### **- SUPPLIER-MANAGER OF THE CONTACT MODE**

The service is provided and managed directly by this application.

### **- PURPOSE OF THE ACQUISITION OF THE PERSONAL DATA**

This service collects personal information for the following purposes:

Make cost estimates, Answering to the request for information, Answering to inquiries about the availability of this property.

### **- TRANSFER OF DATA TO THIRD PARTIES**

The data collected from this service will be transferred to the following categories of third parties:

Possible Collaborators, Employees, Interns, Trainees.

### **- SERVICE DESCRIPTION**

Through this form users have the ability to request information to the structure.

During your contact with pellinindustrie.net, you could be asked to provide us with information needed to continue our interaction using "free-form" fields (for sending forms, emails and other kinds of communication). In this specific case, you will be free to send us further information which will likewise be processed in accordance with the regulations in force regarding the protection of your privacy.

It is important to note that, in certain cases, should you fail to provide the information we request, we will be unable to offer some or all of our services.

## **How pellinindustrie.net stores your personal data and when it transfers them**

All the data you provide during or through using the website <http://pellinindustrie.net> will be processed, subject to your express consent regarding the entire processing or one or more processing operations, by the data controller, the data processors (if designated by the data controller) and/or the persons placed in charge by the data controller and/or by the data processors.

Your sensitive data, should they be provided, may be subject to processing only with your written consent, in compliance with the conditions and limits set by EU Regulation 2016/679 as well as by laws and regulations.

All the operations to be carried out on the data you provide will be conducted with the utmost care and will be adjusted to protect your confidentiality.

The aims of the processing operations will be to collect, record, organise, store, reference, process, modify, select, extract, compare, use, associate, block, communicate, delete and destroy the data, as well as any combination of two or more of the aforementioned activities.

The data you provide us will be processed manually and/or automatically, on paper and/or digitally (with the aid of electronic instruments that we own and/or are provided by third parties). They will be kept using appropriate technical, computerized, organisational, logistical and procedural security measures that meet or exceed the minimum level of protection required in regards to the risks as per Article 32 of the EU Regulation 2016/679 and in all cases comply with any other regulation or provision applicable under the circumstances, for the sole purpose of reducing the risk of destroying or losing the data, even when accidental, the risk of unauthorized access, non-permitted processing or any other processing inconsistent with its aims.

We will only process those data that are strictly pertinent and complete and that do not exceed the aims connected to the services for which they have been collected or subsequently processed, and we will only store them in a form that enables you to be identified for a period of time no longer than necessary for the purposes for which they were collected or subsequently processed.

The juridical basis on which data processing is funded is consent.

Over time, the security measures put into place by pellinindustrie.net may occasionally be adjusted in light of applicable regulations at that moment and the technical evolution of the industry and/or of technologies for storing and filing data.

The manager and/or data processor and the persons placed in charge, appointed by pellinindustrie.net, will be suitably trained, with special attention given to regulations and the adoption of minimum security measures, for the sole purpose of ensuring the data remains confidential and secure. Under no circumstances will the personal data be divulged to third parties without your prior consent.

The personal information you provide through the website <http://pellinindustrie.net> are sent to and could be stored on servers located both within and beyond the European Union.

We may communicate any personal information you provide through using the website <http://pellinindustrie.net> to other companies belonging to the pellinindustrie.net and/or to third parties which will be cited in the particular cases described below.

### **Possible communication of your data to third parties**

All the data processing operations described in this privacy statement may require the information collected by pellinindustrie.net to be shared with our possible affiliate companies located in and beyond Italy, and with our partners, our suppliers (for example, banks, couriers, logistics companies), consultants, marketing companies and any future owner of the website or of our business.

We may release your personal data to other companies in connection with any kind of possible or actual reorganisation, merger, sale, transfer or other provisions regarding our business or part of it, its assets and its shares/stock.

We may also use the services of other companies or individuals to act and work on our behalf, such as, for example, providing services, sending correspondence, providing marketing assistance, analysing data, providing customer support services, or for accounting, financial, sales, administrative/invoicing, legal or fiscal purposes, etc.

In order to be able to carry out the activities delegated to them, the aforementioned individuals or companies will be able to process your personal information as data processors appointed by us or as independent data controllers. We will only reveal to these companies or individuals such personal information as is strictly necessary for them to carry out their specific duties.

When specifically requested, we will be able to collaborate with any court, administrative authority, police authority, or other similar authority in any investigation or procedure that may concern you or is pertinent to your use of the website <http://pellinindustrie.net>.

This collaboration may involve communicating personal information that concerns you to the authorities by their express request.

Although our company adopts suitable measures for protecting the personal information or any sensitive data that you have provided or will provide us while using the website <http://pellinindustrie.net>, by definition no transmission via Internet can ever be guaranteed as absolutely secure.

Therefore, please bear in mind that it is not possible to ensure - and therefore we cannot ensure - the absolute security of any personal information you transmit to us via Internet when using the website <http://pellinindustrie.net> or when using email services.

### **Plugin and Widget**

The website <http://pellinindustrie.net> owned by pellinindustrie.net may use third-party Plugins.

When you visit a page on our website containing one or more of these elements, your browser will display content (text and/or images) sent and/or chosen by the owner of the Plugin. These plugins can also install cookies (third-party cookies).

As a result, our website is not responsible for such content, and we therefore refer you to the privacy statement of the Plugin owner.

The social plugins that our website could use may include, but are not limited to, those from the following social networks: facebook.com ("Facebook"), plus.google.com ("Google+"), the micro-blogging service twitter.com ("Twitter"), etc. In the future, Plugins from other websites and/or social networks could be included on the pages of our website.

#### **Cookies**

The Internet website owned by pellinindustrie.net uses cookies (and/or similar technologies), that is, small strings of text that the websites visited by the user send to his/her terminal (usually to the browser), where they are stored to memory so as to be later sent back to the same websites the next time that terminal visits them. This website only uses technical cookies such as Session and Analytics cookies. These cookies do not allow the acquisition of personal identification data.

#### **Your rights pursuant to art. 15-21 of the GDPR.**

As an interested party, you have the rights referred to in art. 15 of the GDPR and, more precisely, the rights of:

- I. obtain confirmation of the existence or not of personal data concerning you, even if not yet registered, and their communication in an intelligible form;
- II. get the indication:
  - a) of the origin of personal data; b) of the purposes and methods of the processing; c) of the logic applied in case of data processing carried out with the aid of electronic instruments;
  - d) of the identification details of the owner, the managers and the designated representative pursuant to art. 3, paragraph 1, GDPR; e) the subjects or categories of subjects whom the personal data may be communicated or who may become aware of it in their capacity as designated representative in the territory of the State, managers or agents;
- III. get:
  - a) updating, rectification or, when interested, integration of data; b) the cancellation, transformation into anonymous form or blocking of data processed unlawfully, including data whose retention is unnecessary for the purposes for which the data were collected or subsequently processed; c) the attestation that the operations referred to in letters a) and b) have been brought to the attention, also as regards their content, of those to whom the data have been communicated or disseminated, except in the case where such fulfillment is it proves impossible or involves a use of means manifestly disproportionate to the protected right;
- IV. to object, in whole or in part:
  - a) for legitimate reasons, the processing of personal data concerning you, even if pertinent to the purpose of the collection; b) to the processing of personal data concerning you for the purpose of sending advertising or direct sales material or for carrying out market research or commercial communication, through the use of automated call systems without the intervention of an operator by e-mail and / or through traditional marketing methods by telephone and / or paper mail.
- V. It should be noted that the right of opposition of the interested party, set out in point b) above, for direct marketing purposes through automated methods extends to the traditional ones and that in any case the possibility remains for the data subject to exercise the right to opposition even in part. Therefore, the interested party can decide to receive only communications using traditional methods or only automated communications or none of the two types of communication. Where applicable, it also has the rights referred to in Articles 16-21 GDPR (Right of rectification, right to be forgotten, right of limitation of data processing, right to data portability, right of opposition), as well as the right of complaint to the Guarantor Authority.

Requests to exercise the rights must be addressed to the Data Controller, without specific formalities, by sending a communication to the e-mail address [info@pellini.net](mailto:info@pellini.net)

The interested party is entitled to file a complaint with the Personal Data Protection Authority to complain about a possible violation of the regulations regarding the protection of personal data and to request a verification by Italy's Personal Data Protection Authority located in Piazza Venezia 11 - 00187 Rome - Fax: (+39) 06.69677.3785 Telephone switchboard: (+39) 06.696771 E-mail: [garante@gpdp.it](mailto:garante@gpdp.it) pec: [protocollo@pec.gpdp.it](mailto:protocollo@pec.gpdp.it).

#### **Third-party websites and hypertext links**

Our website, <http://pellinindustrie.net>, may contain hypertext links and/or advertisements for other websites which are not owned or controlled by pellinindustrie.net.

Please bear in mind that this privacy statement applies exclusively to the personal information that we collect via our website and we cannot be held responsible in any way for personal information collected, stored and used by third parties through our websites.

pellinindustrie.net recommends reading the privacy statement for each website you visit.

#### **Minors**

When you communicate your personal data to us, we assume and you ensure us that you are not under the age of 18. pellinindustrie.net does not intend to collect any personal information on individuals below the age of 18. When necessary, we will specifically instruct underage users not to communicate their data through our websites and/or we will take reasonable measures to ensure that parents/guardians have control over the communication of such data.

Parents/guardians should be aware that our privacy statement and policy will regulate the use of personal data, but the information given voluntarily by minors - or by others - in comments or similar functions may be used by third parties to generate unrequested correspondence.

We suggest that all parents/guardians teach their children to use their personal data in a safe, responsible manner while using the Internet, monitoring them when necessary to the extent and using the methods that they deem appropriate.

#### **Changes to our privacy statement**

Considering that the current state of automatic control mechanisms cannot rule out errors and malfunctions, we reserve the right to make any changes we deem necessary, or changes that are made mandatory by law or other regulatory bodies, to this privacy statement without prior notification. We strongly advise checking this privacy statement consistently and periodically, as it will be assumed that you have accepted changes and updates if you continue to use the website once they have been published.