

Privacy policy statement pursuant to art. 13 EU Reg. 2016/679 ("EU REG.")

Isolomma s.r.l. tax code and VAT number 00215940248, with registered office at Via dell'Artigianato 24 36020 Albettono (VI) ("**Company**"), in accordance with art. 13 GDPR, and in relation to your personal data ("**Personal Data**") we wish to provide you with the following information.

This statement on the processing of data applies to all the services offered to our customers. This is regardless of the platform from which the service is offered: website, email, telephone, social network or any other form of communication or transmission.

The Website <http://www.isolomma.it/> ("**Site**") and any services offered via the Website are reserved to subjects aged eighteen and over. The Controller does not process personal data relating to subjects under the age of 18. At the request of these Data subjects, the Controller will promptly erase any personal data unintentionally collected.

1 - Data Controller; Data Protection Officer and Data Processors

1.1 The Data controller ("**Controller**") is the company.

1.2 The Controller has not appointed a Data protection officer.

1.3 The companies that provide specific processing services or services connected with, instrumental to or supporting activities conducted by the Controller, or that conduct supervisory activities involving it, have been appointed as Data Processors and, as laid down by current legislation, ensure that appropriate technical and organisational measures are taken to guarantee that processing operations satisfy the requisites established by the Regulation and guarantee that the rights of the data subject are protected.

2 - Personal data processed and source of data

2.1 The Controller processes the following categories of Personal Data:

- **Identification data** The Personal Data collected by the Controller are those supplied by the Data subject of his or her own free will, in particular, for example: name and surname, e-mail address, phone number, date of birth.
- **Invoicing data:** VAT number, company name, address for delivery and invoices, country, province, post code, city/town.
- **Browsing data:** Cookies, usage data

3- Purposes and legal basis of processing

3.1 The principal purpose of processing is to manage the pre-contractual stage and ensure that the contractual relationship with the company is fully and correctly executed, with regard to the relevant requirements and the contractual, legal and fiscal obligations stemming from the relationship.

3.2 Personal Data are processed for the following purposes:

a) *Purposes linked to browsing and the use of services offered on the Website*

The services offered on the Website include, for example, but are not limited to the following:

- to satisfy specific requests on your part
- to submit unsolicited CV applications (in Italy, this is managed by an external company; abroad it is handled internally)
- interaction with social network and external platforms

The legal basis of the processing is to take steps in the performance of a contract or prior to entering into a contract at the request of the data subject, pursuant to art. 6 (1)(b) of the EU Reg.

The provision of Personal Data is necessary and failure to supply the data requested will prevent us from performing the contract.

b) *purposes linked to the handling of orders: when an order is placed, to enable the purchase contract to be concluded and the operations connected with it to be executed in a correct manner, including the delivery of products through the services offered by third parties, and to regulate payments to the company.*

The legal basis of the processing is to take steps in the performance of a contract or prior to entering into a contract at the request of the data subject, pursuant to art. 6 (1)(b) of the EU Reg.

The provision of Personal Data is necessary and failure to supply the data requested will prevent us from performing the contract.

c) *purposes linked to the satisfaction of requests for information made by the contracting party and to meet specific requests made by the Data Subject; to reply by e-mail or telephone to requests made by the Data Subject.*

The legal basis of the processing is to take steps in the performance of a contract or prior to entering into a contract at the request of the data subject pursuant to art. 6 (1)(b) of the EU Reg.

The provision of Personal Data is necessary and failure to pass on the data requested will prevent us from performing the contract.

d) *purposes stemming from legislative obligations connected with taxation, accounting, employment law,*

welfare and social security and insurance, including anti-money laundering legislation;

The legal basis of the processing is a legal obligation imposed by national or European legislation, pursuant to art. 6 (1) (c) of the EU Reg.

The provision of Personal Data is necessary and failure to supply the data requested will prevent us from performing the contract.

- e) *purposes relating to the exercise and defence of the company's rights before any court or authority, also out-of-court;*

The legal basis of the processing are legitimate interests, pursuant to art. 6 (1)(f) of the EU Reg.

- f) *indirect marketing purposes, through "soft spam" communications, that is, by sending commercial messages to its existing customers relating to products or services similar to those already purchased.*

The legal basis of the processing are legitimate interests pursued by the Controller, pursuant to art. 6 (1)(f) of the EU Reg., in order to publicise products/services similar to those already purchased with the aim of ensuring that the data subject is provided with best possible offer, subject to any objection he or she may make at any time.

The provision of Personal Data is optional.

- g) *Purposes relating to the direct marketing or commercial activities conducted by the Controller.*

The legal basis is consent pursuant to art. 6 (1)(a) of the EU Reg. The provision of Personal Data is optional.

4 - Processing methods

The data subject's data may be processed, for the purposes indicated in the previous article, with the use of manual, electronic or electronic communication tools, in accordance with the principles of lawfulness, fairness, transparency, accuracy, relevance and non-redundant storage of data, taking appropriate security, organisational, technical and IT measures.

The Data Controller takes appropriate security measures to prevent unauthorised access, disclosure, alteration or destruction of the Personal Data.

5 - Recipients of Personal Data

The data subject's personal data may, in the pursuit of the aforementioned purposes, be disclosed to/brought to the attention of the following categories of recipient:

- the Controller's employees, as persons authorised to process data
- external companies used by the Controller to carry out operations connected with, instrumental to or resulting from filing services
- external companies that deal with the address handling service and transmission of email messages: Mailchimp is an email address management and message sending service provided by The Rocket Science Group LLC.
- public security and/or tax authorities, welfare and social security bodies, whenever necessary
- Credit protection companies, bodies or associations that may pass on the data to their shareholders, members, users or assignees, within the scope of their official purposes
- system administrators
- external professionals (for example: lawyers, employment consultants, data processing centres, etc.) that provide services for the attainment of the purposes indicated, who - if the legal conditions are met - will be appointed as external data processors
- software houses for the purpose of managing and maintaining the website.

The third parties to whom your personal data may be disclosed act as:

- Autonomous data controllers, that is, subjects that independently define the purposes and procedures to be adopted in the processing of personal data;

- Data processors, that is, subjects who process personal data on behalf of the Controller.

6 - Disclosure of data - Transfer of data abroad

6.1 Personal data may be disclosed, in order to manage existing/developing relations and to perform obligations, to other subjects, such as those dealing with legal expenses insurance, auditing, market and sales information research, etc.

In such circumstances and solely for the aforementioned purposes, the data collected may be transferred outside national territory, also outside the EU, to subjects working with Data Controllers and Processors, in accordance with current data protection legislation.

6.2 Whenever necessary, your Personal Data may be transferred by the company to third countries outside the European Economic Area. In these circumstances, the data will be transferred in accordance with the conditions indicated in articles 44 et seq. of the EU Reg., or, in the case of countries for which "adequacy decisions" have been made by the European Commission, on the basis of Standard Contractual Clauses approved by the European Commission, or applying specific exceptions to the provisions of the EU Reg.

6.3 Personal data are stored on servers situated on the Controller's premises and on Cloud servers

6.4 Personal Data collected are not disseminated.

7- Data storage periods

Processed personal data are stored for the period strictly necessary to carry out/achieve the aforementioned activities/purposes and, in any event, stored for different periods of time, depending on the purposes for which they are being processed, in accordance with legislation as each case arises.

- Personal data processed for the purposes indicated under points 3 a); b); c); d); e); are stored for a period of 10 years from the expiry or termination of the agreement, or, if objections are made, for the limitation period set by legislation for the protection of the related rights, subject to any longer storage periods envisaged in specialised regulations applying in the sector.
- Consent given for marketing purposes, either directly or indirectly, referred to under point 3, is valid unless withdrawn by the data subject. It is pointed out that marketing activities are conducted using data collected over a period of 36 months from the last action implying an intent on the part of the data subject or his or her last positive action.

In any event, the Controller shall take the utmost care to ensure that the data collected are used in an appropriate manner, taking adequate measures to verify periodically that the processing for the aforementioned purposes is still in the interests of the data subject to whom the data refer and if this is not the case, to have the data erased, blocked or rendered anonymous.

The aforementioned data may, in any event, be stored in order to safeguard the rights of the Controller out-of-court or before any judicial authority, in arbitrations and/or mediation and conciliation proceedings.

It is pointed out that:

- in the case of the non-mandatory processing operations referred to under point 3, consent may be withdrawn at any time, adopting the procedures specified under the heading "Rights of the data subject", to which reference is made. The failure to provide data for non-mandatory processing or to give consent will prevent the Controller, and third parties belonging to the categories referred to above, from conducting the aforementioned activities, but will not in any way affect activities or processing operations relating to pre-contractual or contractual activities;
- optional consent shall be valid unless withdrawn by the data subject.

8 - Security measures

8.1 The Controller takes appropriate security measures in order to reduce to a minimum the risk of loss or destruction of personal data, even accidental, unauthorised access or processing that is not permitted or does not reflect the purposes for the collection of data indicated in this privacy statement.

8.2 We recommend, in this privacy statement, that you ensure that the software installed on your computer is capable of protecting network data transmission, both incoming and outgoing (such as, up-to-date anti-virus systems) and that the Internet service provider you have chosen takes adequate measures to safeguard network data transmission.

9 - Rights of the Data subject

The rights vested in you under the EU Reg. include the right:

- to obtain access to your Personal Data and information relating to them; rectification of inaccurate data or the completion of those that are incomplete; erasure of Personal Data regarding you if one of the conditions indicated in art. 17 (1) of the EU Reg. is met and in keeping with the exceptions envisaged in sub-paragraph 3 of that article); restriction of the processing of your Personal Data (if one of the conditions indicated in art. 18 (1) of the EU Reg. is met);
- to request and obtain - if the legal basis of the processing is the contract or consent, and automated tools are used - your Personal Data in a structured, commonly used and machine-readable format, also in order to pass on those data to another data controller (the right to data portability);
- to object at any time to the processing of your Personal Data, in specific situations regarding you;
- to withdraw consent at any time, solely in the event that the processing is based on your consent for one or more specific purposes and relates to common personal data (for example, date and place of birth, home address), or special categories of data (for example, data that reveal your racial origin, political convictions, state of health or sex life). The withdrawal of consent will not affect the lawfulness of processing based on consent carried out prior to its withdrawal;
- to lodge a complaint with a supervisory body (Italian Data Protection Authority – www.garanteprivacy.it).

10 - How to exercise your rights

As a data subject, you may exercise the rights described at any time by sending:

- a registered letter with advice of receipt to the Company's head office, as stated in this statement
- by e-mail to the address: privacy@isolgomma.com.