

DATA PROTECTION POLICY

Pursuant to European Regulation 679/2016
("GDPR")

Redaelli di Piero Redaelli & C. snc. Considers the protection of its users personal data to be of utmost importance and guarantees that the processing of the personal data through the website www.ivanoredaelli.it is carried out in compliance with the rights of the data subject, with particular reference to confidentiality, protection of personal identity and right to the protection of the personal data, in compliance with the provisions of European Regulation 679/2016 and other relevant national and European Community provisions.

Type of Data processed and processing methods

The Website is accessible to Users without the need to provide personal data. The personal data of Users, therefore, can be processed, using automated means, during browsing, upon registration with the Website, when requesting information or the supply of goods.

Furthermore, in the event that a User contacts the company to request information, Redaelli di Piero Redaelli & C. snc. shall collect his/her personal data in order to answer.

Browsing Data

The IT systems and the software procedures used for the functioning of the Website acquire, during the course of normal exercise, certain personal data, of which the transmission is implicit when using Internet communication protocols.

This information is not collected in order to be associated with the identity of the users, however, for their nature alone could, through processing and associations with data held by third parties, allow the identification of the Users.

This category of data includes IP addresses or domain names of computers used by Users who access the website, addresses in URI (*Uniform Resource Identifier*) of the requested resources, the time of request, the method used to submit the request to the server, the size of the file obtained in reply, the numerical code indicating the status of the response from the server (successful, error, etc.) and other parameters relevant to the operating system and computer environment of the User.

Data provided voluntarily by the User

Redaelli di Piero Redaelli & C. snc. also collects the personal data of the Users included in the forms used to request information, estimates, goods or services, as well as forwarded to Redaelli di Piero Redaelli & C. snc. through e-mail.

Personal data automatically placed on the Users computer (Cookies)

Cookies are small files, generally short strings of text and numbers, containing information entered on the Users browser when a website is visited.

During browsing, Users may also receive cookies from different sites on their terminal (so-called “third-party” cookies), set directly by the operators of said websites and used for the purposes and pursuant to the procedures set out by the same. For more information relevant to the type and use of cookies on this website, please refer to the cookie policy.

Purpose for processing of personal data

Redaelli di Piero Redaelli & C. snc. processes the personal data of the Users for the following purposes:

- 1) execution of a service or transaction requested by the User in the scope of the Company’s activity;
- 2) sending of periodic newsletters and updates (i.e. by e-mail) relevant to products, services,
- 3) initiatives and events organised by or in collaboration with Redaelli di Piero Redaelli & C. snc., including invitation to the above-mentioned events, both by using traditional communication methods (i.e. regular mail, phone calls from an operator, etc.), and with automated electronic methods pursuant to art. 130, subsections 1 and 2 of Italian Legislative Decree 196/03 and, where appropriate, pursuant to the European Community and/or national provisions that replace/supplement the aforementioned legislations.
- 4) direct marketing activities, aimed at promoting the services, products and brands of Redaelli di Piero Redaelli & C. snc. , both by using traditional communication methods (i.e. Regular mail, phone calls from an operator, etc.), and with automated electronic methods pursuant to art. 130, subsections 1 and 2 of Italian Legislative Decree 196/03 and, where appropriate, pursuant to the European Community and/or national provisions that replace/supplement the aforementioned legislations;
- 5) market analysis and survey activities, both by using traditional communication methods (i.e. regular mail, phone calls from an operator, etc.), and with automated electronic methods pursuant to art. 130, subsections 1 and 2 of Italian Legislative Decree 196/03 and, where appropriate, pursuant to the European Community and/or national provisions that replace/supplement the aforementioned legislations;

What is the legal basis for the processing

The Data Controller processes the Personal Data relevant to the User where one of the following conditions are present:

- 1) the User has given consent for one or more specific purposes; Note: in some jurisdictions the Data Controller may be authorised to process Personal Data without the User's consent or one of the other legal bases specified below, as long as the User does not object to such processing. However, this is not applicable if the processing of Personal Data is regulated by the European legislation regarding the protection of Personal Data;
- 2) processing is necessary for the execution of a contract with the User and/or the execution of pre-contractual measures;

- 3) processing is necessary to fulfil a legal obligation to which the Data Controller is subject;
- 4) processing is necessary for the performance of a task carried out in the public interest or for the exercise of public authority vested in the Data Controller;
- 5) processing is necessary for the pursuit of the legitimate interest of the Data Controller or third parties.

It is, however, always possible to request clarification from the Data Processor relevant to the actual legal basis of all processing and, in particular, to specify whether the processing is based on the law, envisaged by a contract or necessary for the execution of a contract.

Processing methods

The processing of the Data shall be based on the principles of lawfulness, fairness, transparency, proportionality and minimisation and can also be carried out using automated methods designed to save, manage and transmit them using suitable instruments, *mutatis mutandis* and state of the art, to guarantee security and confidentiality through the use of appropriate procedures that avoid the risk of loss, unauthorised access, illicit use and dissemination.

Storage time of the Data

Data is processed and stored for the time required by the purposes for which they were collected. Therefore:

Personal Data collected for purposes relevant to the execution of a contract between the Data Controller and User will be stored until the execution of the contract is completed.

Personal Data collected for purposes relevant to the legitimate interest of the Data Controller will be stored until such interest is met. The User can obtain further information regarding the legitimate interest pursued by the Data Controller by contacting the Data Controller.

When the processing is based on the User's consent, the Data Controller can store the Personal Data longer, until such consent is revoked. Furthermore, the Data Controller may be required to keep the Personal Data for a longer period in compliance with a legal requirement or an order of an authority. Necessary for direct marketing activities shall be considered valid until the User unsubscribes, which is possible through a link in all e-mails. If the sending frequency is lower, at least every twelve months a verification message will be sent to all users, containing the unsubscribe link.

At the end of the storage period the Personal Data will be deleted. Therefore, at the end of this term the right of access, cancellation, rectification and the right to data portability can no longer be exercised.

Who processes the Data

The party that determines the purposes and methods of Data processing, is the Data Controller Redaelli di Piero Redaelli & C. snc. with registered office in Lurago D'Erba (CO) - 22040, Via Brianza, 4, e-mail: info@ivanoredaelli.it, Tel. 031607336, Fax 031699185.

All employees of Redaelli di Piero Redaelli & C. snc. that access, or will access, Users data operate/will operate under the direct authority of the Data Controller, are/will be appointed third parties and have/will have received, in this regard, appropriate operating instructions.

Users may address any type of communication and request to the Data Controller or Data Processor at the above-mentioned mailing, e-mail or certified e-mail addresses.

Who are the recipients of your Personal Data

The party that determined the purposes and methods of processing the Data is the Data Controller Redaelli di Piero Redaelli & C. snc., with registered office in Lurago D'Erba (CO) - 22040, Via Brianza, 4, e-mail: info@ivanoredaelli.it, Tel. 031607336, Fax 031699185. Your Personal Data can be communicated to and processed by:

(i) corporate or natural persons that act as external data processors, carrying out activities in outsourcing, appointed by Redaelli di Piero Redaelli & C. snc., (including parties entrusted with assistance, communication, marketing, advertising, promotions and sales of products and/or services, as well as advertisers, advertising agencies, IT service providers, Website/APP managers, electronic platform managers, partners, credit institutes, professional firms);

(ii) employees and/or contractors of the Data Controller, operating under the direct authority of the latter, shall be authorised to process your Personal Data;

(iii) employees and/or contractors of the external data processors (including system administrators) that, operating under the direct authority of the external data processors, shall be authorised to process your Personal Data. Your Personal Data will not be communicated to third parties except in the case where your Personal Data is communicated by Redaelli di Piero Redaelli & C. snc., to consultants in order to protect your rights, nor disseminated.

Processing of Data abroad.

Data will not be transferred outside of the European Union.

Users rights with regard to their personal data

The Data Protection Code entitles you, as the Data Subject, to numerous rights. In particular, you have the right to:

1. obtain from the Data Controller confirmation as to whether or not Personal Data concerning you exists, regardless of their being already recorded, and communication of such data in intelligible form, as well as the access to your Personal Data (obtaining a copy) and the relevant information (including the purposes for the processing, categories and origin of the Personal Data, the categories of recipients to which the same were or can be communicated, the storage period (when possible), the exercisable rights);
2. obtain from the Data Processor the correction of your Personal Data and the integration of your incomplete Personal Data;
3. obtain from the Data Processor the erasure of your Personal Data without undue delay, including, when the Personal Data is no longer necessary for the purposes for which they were processed or the legal basis for their processing no longer exists;

4. obtain from the Data Controller the anonymisation or blocking of your Personal Data that have been processed unlawfully, including data whose storage is unnecessary for the purposes for which the Personal Data have been collected or subsequently processed;
5. obtain from the Data Controller the restriction of processing your Personal Data, *inter alia*, when you dispute the accuracy or have opposed the processing, for the period necessary for the respective verifications;
6. receive, in a structured and commonly used format that is machine readable, your Personal Data, as well as transmit or, if technically possible, obtain the direct transmission of your Personal Data to another Data Controller without delay, in the event that the processing is performed using automated means and is based on your consent or is necessary for the execution of a contract to which you are a party;
7. revoke your consent for the processing of your Personal Data for any of the purposes for which the same was given.

You can exercise your rights towards Redaelli di Piero Redaelli & C. snc., through the section "Contact us" on the Website or by sending an e-mail to info@ivanoredaelli.it or sending a letter by regular mail to: Redaelli di Piero Redaelli & C. snc.

Furthermore, should you believe that the processing of your Personal Data breaches Data Protection Legislation, you can submit your complaint to the Supervisory Authority for the Protection of Personal Data of the State where you reside, in the location of where you work or where the alleged breach occurred, or contact the same Authority to request information relevant to the exercise of your rights envisaged by the Data Protection Legislation.

Third-party websites

This Data Protection Policy is applicable to the personal data of the Users, collected through the Website; the same Data Protection Policy is not applicable to other Websites owned by third parties, which you may access through a link on the Website. Redaelli di Piero Redaelli & C. snc., cannot be held liable for the contents of these websites and rules adopted by the same, also with regards to the privacy of the Users and the processing of their personal data during browsing on such websites. Therefore, we ask Users to please be careful when connecting to these sites through the links on our Website, and carefully read their terms of use and data protection policies.

Redaelli di Piero Redaelli & C. snc.,