

## PRIVACY & COOKIE POLICY

Information in compliance to art. 13 of Regulation (EU) 2016/679 (GDPR)

This page describes how the site is managed with regard to the processing of personal data of users who consult it or use the services it offers.

**In case of any discrepancy between the meanings of any translated versions of this Privacy Policy, the meaning of the Italian language version shall prevail**

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### DATA CONTROLLER (who decides why, how and to whom to process the data)

Following consultation of this site, data relating to identified or identifiable persons may be processed.

In addition to browsing data, information may, for example, be collected during contacts and inquiries forwarded by users.

The Data Controller (the person or company that determines how the data will be used and processed and is responsible for the correct handling of all data) is:

**ECOPOL S.p.A.**

– Polo Industriale Sergio Marchionne n.1 – 51013 Chiesina Uzzanese (PT) –

Tel. +39 0572 286000

### RIGHTS OF DATA SUBJECTS

With respect to the processing referred to herein, the data subjects (users of the site) have the right:

- ✎ to ask the Owner of the processing to access their personal data, to correct or erase them, to limit their processing, or to object to their processing;
- ✎ if the processing occurs by automated (computerized) means, on the basis of their consent, the data subject may receive their personal data in a structured format, of common use and legible by an automated device, and/or obtain their direct transmission to another data controller, if this is technically possible;
- ✎ to revoke their consent at any time (without affecting the lawfulness of the processing based on the consent before revocation); the consent in question obviously regards that given for processing carried out on the basis of this presupposition;
- ✎ to lodge a complaint with a supervisory authority: Data Protection Authority - Garante per la protezione dei dati personali  
Piazza Venezia n. 11 00187 ROMA – Telephone switchboard: (+39) 06.696771  
- E-mail: [garante@gpdp.it](mailto:garante@gpdp.it) - certified mail - [protocollo@pec.gpdp.it](mailto:protocollo@pec.gpdp.it).

More information at the end of this policy

Requests should be addressed to ECOPOL S.p.A. through the Contact Form on the sites or the address [privacy@ecopol.com](mailto:privacy@ecopol.com), always bearing in mind that it will not be possible to respond to phone requests if there is uncertainty about the caller's identity and that even in other cases the data subject party must be identified with certainty.

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## Browsing data– Data processed in relation to visiting

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During their normal operation, computer systems and software procedures used to operate a website acquire certain personal data. The transmission of these data is implicit in the use of internet communication protocols.

This information is not collected to be associated with identified data subjects, but it could lead by its own nature to identifying users through processing and through association with data held by third parties.

This category of data includes, for example, the IP addresses or domain names of the computers used by users connecting to the site, the URI (Uniform Resource Identifier) notation addresses of the requested resources, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (successful outcome, error, etc.) and other parameters related to your operating system and computing environment, such as browser type and version, browser plug-in types and versions, mobile device identifier (IDFA or Android ID)

Unless you have specifically agreed to allow us to use such data for other means, it will only be used to derive anonymous statistics about how our website is used and to check it is working correctly.

However, data could be used to ascertain responsibility in the event of cyber crime causing damage to the website, in which case specific procedures would be activated to identify the author of the crime.

The legal basis for processing data is to enable the Data Controller to pursue legitimate interests, ensuring our website works correctly and improving our service standards, whilst providing data protection.

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## HOW DATA ARE PROCESSED AND BY WHOM

Personal data are processed by automated tools for the time strictly necessary to achieve the purposes for which they were collected. The processing related to the *web* services of this site is handled by personnel appointed by the Data Controller as well as by external subjects, appointed as data processors (art. 28 EU Reg. 2016/679), who are entrusted with the technical management and maintenance of the site and its information systems. Specific security measures are observed to prevent data loss, illicit or incorrect use and unauthorized access.

### **Personal data acquired through the web service will not be disclosed.**

Personal data supplied by users who make inquiries or sign up for resources such as our newsletter are used only to meet the specific request made. In these cases, the data are shared with third parties only when necessary to perform said request or activity.

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## DATA VOLUNTARILY PROVIDED BY THE USER

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Apart from the navigation data mentioned above, as a user you may choose to provide personal data while you are using the website to ask us to send you information or various types of communication. Missing details may mean we are unable to respond to any such request.

When you visit a part of our website that requires the collection of personal data, you will see a link to this document. If necessary, you may be asked to agree to it being collected.

When you voluntarily and explicitly send an email to the addresses given on this site, your email address is automatically acquired so that we can respond to your request. Unless otherwise stipulated, we also automatically acquire any other data included in the email you send us and will keep it for as long as we need it in order to provide you with the information you requested.

Below you will find specific information relating to some of the pages on this website which are designed for particular services, to satisfy requests or which may lead to us to acquire further personal details.

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## HOW WE USE YOUR DATA WHEN WE OBTAIN IT THROUGH A CONTACT REQUEST

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The personal data provided voluntarily by you, through the contact area and/or by disclosing an email address on the website:

1. is processed with predominantly computer-based tools in order to:
  - 1.1. Ensure a certain and timely response that satisfies the data subject's requests (legal basis of the processing: legitimate interest and consent of the data subject in the case of "sensitive" personal data);
  - 1.2. fulfil obligations deriving from EU laws, rules and regulations; fulfil instructions given by the Judicial Authority (legal basis of the processing: coinciding with the purpose);
2. The contact details, postal and email addresses provided may be used to send courtesy communications and/or informative material/offers relating to the products offered and services provided by the Data Controllers, obviously with the data subject's consent. It is understood that the data subject will still have the right to object to this processing at any time (legal basis of the processing: legitimate interest of the data controllers consisting in promoting their products/services, and the data subject's consent)

3. They may be processed by commercial staff, IT system maintenance personnel tasked with ensuring system functionality, data security and backup operations, other personnel in charge within the limits of the assigned tasks and as required by company procedures, and other parties that provide services for purposes auxiliary to satisfying the data subject's requests, also within the limits strictly necessary to fulfil their duties;
4. They may be communicated or made available:
  - to parties who can access the data by virtue of law, regulations or EU legislation, within the limits provided for by such rules;
  - other associated companies (subsidiaries – parent companies), always for current "administrative and accounting purposes" connected to satisfying the data subject's requests
  - to other parties who provide services for purposes related to satisfying the data subject's requests, within the limits strictly necessary to perform their duties - commercial partners, whose collaboration is necessary to provide the requested services. The Commercial Partners will operate as independent data controllers for the processing and in compliance with the respective privacy policies, which they will make available.
5. Personal data will be transferred to parties outside the European Economic Area to the country where the data subject resides or is located, only if necessary to satisfy their requests and in compliance with the current legislation.

When filling in the forms, mandatory fields are marked with an asterisk. Without the requested data, it will not be possible to satisfy the data subject's requests.

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## DATA RETENTION

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The data communicated, unless otherwise duly indicated by the data subject, will be kept for the time necessary to satisfy the data subject's requests and comply with the law.

If the data subject has a contractual relationship with the Controller, the data will be retained, if relevant to it, for the duration of the contract, after which the retention will be continued only if obligatory by law and in accordance with the rules on the retention of administrative records (or as indicated in the information disclosed at the time of the establishment of the contractual relationship)

The contact details for which consent has been given to send commercial communications or newsletters will be kept for up to 12 months after the last sending or until the data subject withdraws their consent.

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## COOKIE POLICY

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This Section describes the characteristics of the cookies in use.

Legal bases of the treatments that originate with the use of cookies are:

- > for technical cookies (necessary for the proper functioning of the site and to enable navigation): the legitimate interest of the owner coinciding with the purpose of the cookies;
- > for any profiling cookies: the consent of the user manifested in the manner described in the aforementioned provision of the Guarantor, i.e., continuing to browse after having certainly read the notice displayed on the banner that appears as soon as you first land on the site.

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## WHAT TYPE OF COOKIES ARE PRESENT IN THE WEB SITE ?

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This site only uses a technical session cookie needed to maintain the display in the language chosen by the user.

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## COOKIES - IN-DEPTH

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### What cookies are and how they work

Cookies are small text files that sites visited by a user send to the user's terminal. These files are saved and stored in the user's browser folders, and then transmitted back to the same sites on the following visit.

Through cookies, servers receive information that is re-read and updated every time the user returns to the site.

Cookies contain the following information:

- Indication of the server or domain from which they were generated;
- Their duration (or expiration date);
- A unique identification code;

- a unique value.

In any case, cookies cannot cause damage to the user's computer.

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### What cookies are used for

Cookies are intended to facilitate browsing of the site and improve the browsing experience. They also provide the site operator with information, most often aggregated and anonymous, about users' browsing in order to obtain statistical data on site use.

Also, some cookies collect and store information on the user's device about what the user has done on the sites. This information can be used:

- > to recognize the user (or, rather, the device used by the user) by re-proposing their previously requested/chosen settings even during subsequent visits;
- > to analyze the preferences manifested by the user during browsing by creating a profile used essentially to display or send personalized sales promotion messages, that is, which are in line with the interests assumed from the user's browsing.

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### Types of cookies

Cookies can be divided into the following categories: *Technical cookies* and *Profiling cookies*.

- > **"TECHNICAL" and functionality COOKIES:** *Technical cookies are used for the sole purpose of "carrying out the transmission of a communication over an electronic communications network, or to the extent strictly necessary for the provider of an information society service, explicitly requested by the subscriber or user to provide such service" (see Article 122(1) of the Code).*

These allow the site to function optimally, but you may choose not to allow their use by changing the settings of the browser you are using. Disabling these cookies may prevent access to certain features of the site.

Within the scope of Technical Cookies it is possible to distinguish:

- **Browsing cookies**

They are necessary to navigate within the site using all its features (such as session maintenance and access to restricted areas) and do not collect information to be used for profiling or commercial purposes. Without these cookies, it would not be possible to provide the services requested.

- **Functionality cookies**

They allow the user to navigate based on a selected set of criteria (e.g., site language), thereby facilitating navigation. The information collected through such cookies is anonymous.

The prior consent of users is not required for the installation of technical cookies, although the obligation to provide this information remains. The acquisition and processing of data resulting from the use of technical cookies is necessary for the correct consultation of the site. In case of opposition by the user, the user will not be able to see the site correctly and in its entirety.

The legal basis for the use of technical cookies remains the legitimate interest of the owner consisting in the smooth operation of the site and improvement of the services rendered.

### Cookie analytics

They are assimilated to technical cookies where they are used directly by the site operator to collect information in aggregate form about the number of users and how they visit the site. They are used to optimize the management of the site. The information collected by these cookies does not identify the user.

### > PROFILING COOKIES

As mentioned above, these cookies enable the acquisition of information related to the preferences and ways in which the user interacts with the site and are used to assign a profile to the user (actually most of the time to the terminal used by the user) in order to optimize the effectiveness and usability of the site at the highest level, also by customizing the promotional/advertising messages displayed to the individual user.

Such cookies can only be installed on users' terminals when they have been previously and adequately informed and have provided their consent, which can also be simply manifested, as provided for in the measure cited in the introduction, by continuing browsing after reading the notice displayed upon first access to the site.

The legal basis for the use of profiling cookies is the consent of the interested party (user of the device used for browsing) manifested in the manner provided by the already mentioned general provision of the Guarantor for the protection of personal data "Identification of the simplified procedures for information and acquisition of consent for the use of cookies" of May 8, 2014 [ <https://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/3118884>].

## DATA SUBJECT RIGHTS - IN-DEPTH

**Right of access:** The data subject has the right to obtain confirmation from the data controller as to whether or not personal data concerning him or her are being processed and, if so, to obtain access to the personal data and the following information:

- (a) the purposes of processing;
- (b) the categories of the personal data in question;
- (c) the recipients or categories of recipients to whom the personal data have been or will be disclosed, particularly if recipients in third countries or international organizations and, if so, the existence of appropriate safeguards;
- (d) when possible, the expected time period of retention of personal data or, if this is not possible, the criteria used to determine this time period;
- (e) the existence of the data subject's right to request from the data controller the rectification or erasure of personal data or the restriction of the processing of personal data concerning him or her or to object to their processing;
- (f) the right to file a complaint with a supervisory authority;
- (g) if the data are not collected from the data subject, all available information on their origin;
- (h) the existence of any automated decision-making process, including profiling, which produces legal effects concerning him or her or significantly affects him or her in a similar way, and, at least in such cases, meaningful information about the logic used, as well as the importance and expected consequences of such processing for the data subject.

**Right of rectification:** The data subject has the right to obtain from the data controller the rectification of inaccurate personal data concerning him or her without undue delay.

**Right of cancellation:** The data subject shall have the right to obtain from the data controller the erasure of personal data concerning him or her without undue delay, and the data controller shall be obliged to erase the personal data without undue delay if one of the following grounds exists:

- (a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- (b) the data subject withdraws the consent on which the processing is based and there is no other legal basis for the processing;
- (c) the data subject objects to the processing, and there is no overriding legitimate reason for processing;
- (d) the personal data have been processed unlawfully;
- (e) the personal data must be deleted in order to comply with a legal obligation under European Union law, or under the law of the member state that the data controller is subject to;

**Rights to limitation of processing:** The data subject has the right to obtain the restriction of processing from the data controller when one of the following cases occurs:

- (a) the data subject disputes the accuracy of personal data, for the time period necessary for the data controller to verify the accuracy of such personal data;
- (b) the processing is unlawful and the data subject objects to the deletion of personal data and instead requests that their use be restricted;
- (c) although the data controller no longer needs them for the purposes of processing, the personal data are necessary for the data subject to establish, exercise or defend a right in court;
- (d) the data subject has objected to the processing, pending verification as to whether the data controller's legitimate reasons prevail over those of the data subject;

**Right of opposition:** The data subject has the right to object at any time to the processing of personal data concerning him or her carried out for direct marketing purposes, including profiling, insofar as it is related to such direct marketing.

**Right to data portability:** The data subject shall have the right to receive, in a structured, commonly used and machine-readable format, personal data concerning him or her that have been provided to a data controller, and shall have the right to transmit such data to another data controller without any hindrance by the data controller to whom he or she has provided them if:

(a) the processing is based on consent or a contract; and

(b) the processing is carried out by automated means.

When exercising their rights with regard to data portability, the data subject has the right to obtain direct transmission of personal data from one data controller to another, if technically feasible.

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## SOME DEFINITIONS

**Personal data:** Any information relating to an identified or identifiable natural person

**"Particular" personal data NEED MORE PROTECTION AND PARTICULAR ATTENTION**, such are personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as genetic data, biometric data intended to uniquely identify a natural person, data relating to a person's health or sex life or sexual orientation (Art. 9 of EU Reg. 2016/679)

**Processing means** any operation or set of operations, performed by any means or methods and applied to personal data or sets of personal data, (such as collecting, recording, organizing, structuring, storing, adapting or modifying, extracting, consulting, using, communicating by transmission, dissemination or any other form of making available, comparing or interconnecting, limiting, erasing or destroying)

**Data Subject:** The natural person to whom the personal data refer.

**Controller:** the natural or legal person, public authority, department or other body which, individually or jointly with others, determines the purposes and means of the processing of personal data

**Data Processors** (appointed pursuant to Art. 28 EU Reg. 2016/679): the natural or legal person, public authority, service or other body that processes personal data on behalf of the Data Controller.

**Legal basis for processing:** the normative principle under which the personal data processing described can be carried out, in many cases coinciding with the stated purpose.