



PRIVACY POLICY of www.errecom.com
Information pursuant to art. 13 of EU Regulation 2016/679
(Version updated to 5 June 2020)

Dear User,

the company **ERRECOM S.p.A** (hereinafter also referred to as the "Owner") is particularly attentive to aspects concerning the privacy of its users and, through this page, intends to describe how to manage its website www.errecom.com (hereinafter "Site") with reference to the processing and protection of personal data of users who access it. This is a general information provided in compliance with EU Regulation 679/2016 "Regulation on the protection of individuals with regard to the processing of personal data and on the free movement of such data" (hereinafter EU Reg.) for the Site only and not for other websites that may be consulted by the User through links on its pages for which the Owner is in no way responsible.

1. Data Controller

Data Controller of the data provided by the user is the company **ERRECOM S.p.A.**, with registered office in 25030 - Corzano (BS), Via Industriale, n. 14, Italy - Tax Code/VAT: 02179230988, Tel. 030.9719096, E-mail: privacy@errecom.com

2. Type of data collected

a) Navigation Data

The computer systems and programs used to operate the Site collect certain personal data whose transmission is implicit in the use of Internet communication protocols. This information, even if it is not collected to be associated with the identified data subjects, could, by its nature, through processing and association with data held by third parties, allow the identification of users. This category of data includes IP addresses or domain names of computers used by users who connect to the Site, addresses in URI notation (Uniform Resource Identifier) of the resources requested, 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, error, etc.) and other parameters relating to the operating system and the user's computer environment.

b) Data provided voluntarily by the user (art. 4 p.to 1 EU Reg.)

For the consultation of the site is not required the provision of any personal data by the User. However, the optional, explicit and voluntary sending of personal data of the User indicated on this Site as well as the insertion of the same in the "Contact" section or the fill out the form "Newsletter" will involve the acquisition of the User's address and personal data entered by the latter, necessary to respond to requests sent. The data collected by the Owner are only common personal data (such as but not limited to: name, surname, telephone number, e-mail address). The Owner invites the user not to send, in their requests for services or questions, names or other personal data of third parties that are not strictly necessary.

c) Cookies

For information regarding the use of cookies through this site please read the [cookie policy](#).





3. Legal basis and Purpose of the treatment

The legal basis for the treatment of *navigation data* (point 2, letter a) is to pursue the legitimate interests of the Owner in relation to the management of the Site. Said data will be used by the Owner for the following purposes:

- make it possible to access and navigate the Site;
- collect data and information in aggregated form only and anonymous to verify the correct functioning of the Site;
- collect data and information in order to protect the security of the Site (filters antispam, firewall, virus detection) and users;
- obtain anonymous statistical information on the use of the Site.

In the event of computer crimes committed to the detriment of the Site, the navigation data may also be used to ascertain responsibility.

The legal basis for the processing of data provided voluntarily by the user through the sending of personal data indicated on this Site or through the fill out in "Contacts" section (point 2 letter b) is the legitimate interest of the Owner to give feedback to the User, carry out the service or performance requested, including the management of any applications submitted spontaneously by the User.

Furthermore, subject to the explicit consent of the User, the data provided by the latter through the "Contacts" section will be processed:

- a. for the sending by the Owner of newsletters;
- b. for the carrying out of promotional and marketing activities.

The legal basis for the processing of data provided voluntarily by the User through the fill out the form "Newsletter" and by clicking on the button "Subscribe" (point 2 letter b), is the legitimate interest of the Owner to accept the User's registration request in order to send the newsletter and any other information material.

Furthermore, subject to the explicit consent of the user, the data provided by the latter through the fill out the form "Newsletter" and by clicking on the button "Subscribe" will be processed:

- c. for carrying out promotional and marketing activities.

4. Consequences of non-communication of personal data

The navigation data collected in the context of this treatment (point 2, letter a) are mandatory as they are strictly functional to the computer management of the Site.

The provision of personal data by User through the addresses indicated on this Site or through the "Contacts" section is optional and aimed solely to respond to the User's requests. Failure to provide of aforesaid data will therefore make it impossible for the Owner to reply.

Failure to consent to the processing of personal data provided voluntarily by the User through the "Contacts" section for the purposes referred to in point 3 letter a), b) will not prevent the User from filling in the "Contacts" section but will not allow the Owner to follow up the purposes indicated.

Failure to consent to the processing of personal data voluntarily provided by the User by filling out the form "Newsletter" and clicking on the button "Subscribe" for the purposes referred to in point 3 letter c), will not prevent the User from subscribing to the Newsletter but will not allow the Owner to follow up the purposes indicated.



5. Methods of data processing

The processing, carried out only by personnel directly authorized by the Owner, is carried out according to principles of correctness, lawfulness, transparency and can be carried out with or without the aid of electronic or automated tools. This treatment will include all the operations provided for by art. 4, n. 2, EU Reg. (collection, recording, organization, structuring, storage, adaptation or modification, extraction, consultation, use, communication through transmission, diffusion or any other form of making available, comparison or interconnection, limitation, cancellation or destruction of data) necessary for the treatment in question, including communication to the subjects listed in the following paragraph "Communication of data".

The data will be recorded and stored in both paper and computer files, according to principles of correctness, lawfulness, transparency, with organizational systems related to the purposes of processing. Moreover, in order to protect data from destruction or loss (even accidental) as well as to ensure their integrity and confidentiality (including against unauthorized access or disclosure) and in general to ensure the rights of the data subject, the Owner has adopted security measures of a technical and organizational nature, in accordance with the provisions of EU Reg. (with particular reference to Articles 24, 32 and 35).

6. Communication of data

Personal data provided by the user may be communicated:

- within the company, to persons authorized to process data pursuant to art. 29 EU Reg., according to their respective profiles of competence and for the purposes of the processing itself (e.g. administrative, commercial, marketing, legal, system administrators, etc.). These subjects include the employees and/or collaborators of the Data Controller regardless of the relationship in place (e.g. administrators, interns, etc.) who, in order to carry out the work tasks entrusted to them, need to process personal data;
- to subjects external to ERRECOM S.p.A., appointed for this purpose as Data Processors pursuant to art. 28 EU Reg. operating on behalf of the Owner and according to his instructions, but exclusively for activities strictly related to the purposes indicated above (for example to ensure the operativity of the Internet service or the management of addresses and the sending of messages and mail (Mailchimp). It is possible to obtain an updated list of the Data Processors by contacting the Data Controller.
- to subjects who need access to the data for purposes ancillary to the relationship between the User and the Owner, within the limits strictly necessary to carry out auxiliary tasks (such as, for example, technical service providers, IT companies, communication agencies);
- to persons who can access the data by virtue of provisions of the Law or Regulations, within the limits provided for by such rules.

7. Dissemination of data

Personal data collected for the purposes indicated will not be disseminated.



8. Period of storage of data

Navigation data (point 2, letter a) will be stored for a period of time not exceeding the time necessary to achieve the purposes for which they are processed, without prejudice to the need for storage for a longer period in compliance with applicable legislation.

Data provided voluntarily by the User through optional, explicit and voluntary sending of their personal data to the addresses indicated on this Site or through the compilation of the section "Contacts" (point 2, letter b) will be kept for a period of time not exceeding one year.

Data provided by the User by filling out the form "Newsletter" and clicking on the button "Subscribe" will be kept for the time necessary to fulfill the purpose indicated above and in any case until the request for cancellation by the interested party.

Where the processing is based on the explicit consent of the User (point 3, letter a, b, c), the latter may always revoke the consent given. This, however, is without prejudice to the lawfulness of processing based on the consent given before the revocation.

9. Place of data storage

The personal data provided by the User may be transferred to third parties to ERRECOM S.p.A., appointed for this purpose as Data Processors pursuant to art. 28 Reg. EU, also based outside the European Union. In this case, the Owner guarantees that:

- the third Country of destination of personal data ensures an adequate level of protection;
- the data transferred to non-European territory will be managed directly with the Managers appointed by applying all the provisions of Reg. EU.

10. User rights

The User to whom the personal data refer has the right to request and obtain, at any time, from the Data Controller, access (art. 15 EU Reg.), rectification (art. 16 EU Reg.) and cancellation (right to forget) (art. 17 EU Reg.) of his personal data. The User is also granted the right to limit the processing of personal data (art. 18 EU Reg.), the right to the portability of the same (art. 20 EU Reg.) and the right to object, for legitimate reasons, to their processing (art. 21 EU Reg.).

In any case, the User has the right to lodge a complaint with the Guarantor, as provided for by art. 77 EU Reg., or to take appropriate legal action under art. 79, EU Reg. if he believes that the processing of personal data referred to him has occurred in violation of the provisions of the EU Reg.

11. Methods of exercising rights

The User may exercise his rights at any time by sending an e-mail to privacy@errecom.com or a registered letter with return receipt to the address: ERRECOM S.p.A., Via Industriale, n. 14, 25030 - Corzano (BS) - Italy.

12. Changes to this Policy

The Owner reserves the right to modify this Policy. The date indicated at the beginning of this Notice indicates the date of the last update. In case of substantial changes, a notice will be provided through the Website, or by other means, to give the User the opportunity to verify the changes before they take effect.

