Loc. Brucco, Frazione Abrau - 12013 Chiusa di Pesio (CN) Italy

The Controller scrupulously respects the privacy of its customers and this Website's users. On this page, we intend to transparently and thoroughly describe, in detail, the methods for managing this Website with reference to the processing of personal data of users who consult it.

This policy is drafted in compliance with Art. 13 of Italian Legislative Decree No 196/2003 ("Personal data protection code") and the provision of the Italian Data Protection Authority of 8 May 2014, with reference to the processing of personal data of users of the website **idroricerche.com** (hereinafter referred to as the "Website") by its Controller.

This privacy policy does not, on the other hand, refer to the services offered by third parties (that it may be possible to access by means of links included on this Website) and to their methods of processing users' personal data.

We suggest carefully reading the related privacy policies, on the websites of respective third parties, on how the user's personal data will be processed by them and, potentially, shared.

The Controller has no power to control these third parties and, therefore, declines any liability with reference to the processing of users' personal data that is implemented through their sites.

This information policy may be subject to supplements or changes in order to update it with respect to the regulations and/or to adapt it to any technical changes made to the Website or to any changes in the purposes or methods of the data processing.

The Controller will inform you of any changes by special notices, but we advise you to periodically check this page in order to stay updated. Any updated versions, indicating the date of the update, will be promptly published on this web page and will take effect immediately after publication.

#### 1. Data Controller

The Data Controller for the processing of personal data collected through this website is IDRORICERCHE SRL, a company under Italian law with registered office in Loc. Brucco S.N. Fraz. Abrau - 12013 CHIUSA DI PESIO (CN), Tax code and VAT no. 02935850046, email: dalmasso@idroricerche.com also identified as the "Controller". The list of any external processors may be requested by forwarding a simple written request to the Controller to the details indicated above.

#### 2. Processing purposes

The Controller will use the personal data of the users of the Website to deliver services described therein and to customise and continuously improve the Website for users. If the user is under 18 (eighteen) years of age, or does not possess legal capacity, this Privacy policy is addressed to the party responsible under current Italian law, who is the sole party authorised to give their express consent.

The user's data will be collected to enable the Controller to provide their services, as per the following purposes: Statistics, Managing contacts and sending messages, displaying content from external platforms, contacting the user, interacting with social networks and external platforms,

optimising and distributing traffic, advertising, registration and authentication, remarketing and behavioural targeting and protection from SPAM.

To obtain further detailed information on the processing purposes and on personal data that is concretely relevant for each purpose, the user may refer to the related sections in this document.

### 3. Types of data subject to processing

The personal data that the Controller collects and processes are those relating to information that may be provided by the user via the contact forms on the Website, the information that may be provided during newsletter registration, any use of social networks, as well as browsing data, here including so-called technical cookies, etc.

Complete details on each type of data collected are provided in the dedicated sections of this privacy policy or via specific information texts displayed before collecting the data itself. The personal data may be freely provided by the user or, in the case of use data, automatically collected during the Controller's use.

Where not otherwise specified, any use of Cookies - or other tracking tools - by the Controller or by controllers of third-party services used, has the purpose of providing the service requested by the User, as well as additional purposes described in this document and in the Cookie Policy, where available.

#### 3.1 Data provided voluntarily

The Controller will acquire the data that the user voluntarily and freely provides by sending emails to the addresses identified on the Website (or by filling in and sending the various forms present on the Website). In particular, as well as the user's email address, which is needed to respond, any other personal data to which the electronic communication refers or, in any case, contained in the email message will be acquired. These data will not be disseminated or communicated, in any way, to third parties in relation to the organisation of the Controller, nor will they be used to define the profiles or personality of the data subject or for purposes directly or indirectly commercial or advertising-related and, in any case, will only be stored for correspondence archiving purposes.

### 3.2 Newsletter

The newsletter service is reserved for certain categories of registered users. To distribute and manage this service, the Controller uses the services and tools provided by the MailUp website. For more information on the processing of personal data by MailUp, the Controller advises you to carefully consult the following link: <u>https://www.mailup.com/privacy-statement/</u> The failure to provide personal data will not entail any consequence for the user except for the fact that the user will lose the opportunity to use the services requested, if they do not provide necessary data:

Personal data collected: Cookies and use data. Place of processing: United States – <u>Privacy</u> <u>Policy</u>. Member of the Privacy Shield.

### **3.3 Social Networks**

The Controller allows the user to share links to Website content by using their Facebook, Twitter, Google+, Tumblr, LinkedIn, and Pinterest accounts. The Controller will not store the password of these accounts. If you wish to use these social media functionalities, we warn you that we would be able to use your username and profile image within the Website.

Personal data collected: Cookies and use data. Place of processing: United States – <u>Privacy</u> <u>Policy</u>. Member of the Privacy Shield.

#### **3.4 Geolocation**

When navigating the Website, the Controller will be able to acquire information on your device, including information on your position. The Controller will be able to use this information to provide you with services and/or announcements available in your geographic area, solely on the basis of your device's settings. You will be able, at any time, to deactivate the geolocation function via your device's settings. For more information on how to deactivate this service on your device, we advise you to contact your mobile service provider or device manufacturer.

Personal data collected: Cookies and use data. Place of processing: United States – <u>Privacy</u> <u>Policy</u>. Member of the Privacy Shield.

#### **3.5 SPAM protection**

This type of service analyses traffic from the Controller's website, potentially containing users' personal data, in order to filter it from traffic, messages, and content recognised as SPAM.

• GOOGLE RECAPTCHA Google reCAPTCHA is a SPAM protection service provided by Google Inc. The use of the reCAPTCHA system is subject to Google's <u>Privacy Policy</u> and <u>terms of use</u>.

Personal data collected: Cookies and use data. Place of processing: United States – <u>Privacy</u> <u>Policy</u>. Member of the Privacy Shield.

#### **3.6 Statistics**

The services contained in this section enable the Data Controller to monitor and analyse the traffic data and serve to keep track of the user's behaviour.

 GOOGLE ANALYTICS Google Analytics is a web analysis service provided by Google Inc. ("Google"). Google uses personal data collected for the purpose of tracking and examining the use of the Controller's website, compiling reports and sharing them with other services developed by Google. Google could use personal data to contextualise and customise advertisements of its own advertising network. Personal data collected: Cookies and use data. Place of processing: United States – <u>Privacy Policy</u> – <u>Opt Out</u>. Member of the Privacy Shield.

#### **3.7 Display of content from external platforms**

This type of service makes it possible to display content hosted on external platforms directly by the Controller's website pages and to interact with them. If a service of this type

is installed, it is possible that, even in the case of users who don't use this service, it may collect traffic data relating to the pages in which it is installed.

- WIDGET GOOGLE MAPS Google Maps is a map display service managed by Google Inc. which enables the Controller's website to integrate this content within its own pages. Personal data collected: Cookies and use data. Place of processing: United States – <u>Privacy</u> <u>Policy</u>. Member of the Privacy Shield.
- GOOGLE FONTS Google Fonts is a font display service managed by Google Inc. which enables the Controller's website to integrate this content within its own pages. Personal data collected: Use data and various types of data according to what is specified by the service's privacy policy. Place of processing: United States – <u>Privacy Policy</u>. Member of the Privacy Shield.

#### **3.8 Data processed in relation to the use of accessible services via the use of credentials**

Some of our site's services are reserved for certain categories of registered users. To complete the registration procedure, the user will need to provide the following personal data:

- first name and surname;
- address;
- telephone number;
- email address;

The user will also need to select a username and password. The granting of all other personal data requested as part of the registration procedure is optional and entirely up to the user. The data provided for the use of accessible services by using credentials, together with a physical address, may also be processed:

- in order to invoice the paid services and/or the purchase of products requested by the registered user;
- to send updates (including customised ones) on the controller's activities to the registered user, in particular on new services, special offers, new products, surveys, opinions and other types of communication relating to the controller's services;
- for marketing activities carried out by the controller, such as, by way of non-limiting example, sending updates and/or newsletters (including customised ones) via email on the Controller's activities/products/initiatives/promotions, and for the processing of statistical and commercial research studies.
- for all purposes connected to carrying out the services the Website provides.

Any use of Cookies - or other tracking tools - by the Controller or by controllers of third-party services used, where not otherwise specified, has the purpose of providing the service requested by the User, as well as additional purposes described in this document and in the Cookie Policy, where available.

The failure to provide personal data will not entail any consequence for the registered user except for the fact that the user will lose the opportunity to use the services requested, if they do not provide necessary data.

#### 4. Processing methods and disclosure scope of personal data

The personal data held for the purposes described above are processed by the Controller, in a legal and fair way, mainly by using automated or semi-automated tools.

These data will not, in any case, be disseminated or communicated in any way to external parties, except for the obligations set forth in this sense according to law. The Controller adopts suitable security measures aimed at impeding the access, disclosure, unauthorised amendment or destruction of the personal data.

The processing is carried out using IT and/or telematic tools, with organisational methods and logic strictly correlated to the purposes indicated, in compliance with the provisions of Art. 32 of the GDPR 2016/679 and Annex B of Legislative Decree no. 196/2003 as amended and supplemented (Articles 33-36 of the Code). Unless otherwise specified in relation to individual processing purposes, as indicated above, the personal data collected may be communicated to, or in any case come to the attention of, persons in charge and/or processors (including external ones) of the processing in relation to the expertise and functions of each, in order to meet the above-mentioned purposes or to implement specific legal and/or contractual duties. The data are processed at the operating branches of the Controller and in any other place in which the parties involved in the processing are located. The personal data that the Controller processes are not, generally, communicated to other parties, except for the case in which it is necessary in order to comply with legal or contractual provisions or to fulfil specific duties. In this case, the above-mentioned data may, in particular, be brought to the attention of the following parties or of the following categories of parties, within the limits in which it is necessary to fulfil legal and/or contractual obligations;

- i. consultants and collaborators, whether internal or external, to comply with the current legislation and/or to carry out contractual services in relationships with the individual data subjects (for example, employment consultants, legal consultants, accountants, tax consultants, auditors, etc.);
- ii. legal authorities or other public authorities, in compliance with the purposes indicated above or according to legal obligations.

It is, in any case, always possible to request the Controller to clarify the concrete legal basis for each processing and, in particular, to specify whether the processing is based on law, stipulated in a contract or necessary in order to conclude a contract.

#### 5. Optional nature of providing data and consequences for any refusal by the user

Except for the case in which the acquisition of data occurs automatically as a result of the user's simple navigation of the site (browsing data and technical cookies) - or in which providing data is necessary for the purposes of using the services that the user requests - providing all other personal data is entirely optional. The failure to provide optional data does not entail any injurious consequence for the user. The failure to grant necessary data may, instead, entail the impossibility of using services for which it is necessary to provide such data.

#### 6. Rights of the data subjects

Pursuant to Art. 7 of Legislative Decree no. 196/2003, in its role as processing data subject, the user has the right to obtain information regarding:

a. the existence, or lack thereof, of personal data that concern them, their content and their origin, as well as their communication in an intelligible form; the purposes and processing methods and the logic applied in the processing carried out with the aid of electronic tools;

b. the parties or the categories to which the personal data may be communicated or who may become aware of them in their role as designated representative within the country, processors or those in charge.

The user also has the right to obtain:

- updates to, rectification or, if desired, supplementation of the data;
- erasure, anonymisation or blocking of data processed in breach of the law, including those data that do not need to be stored in relation to the purposes for which they were collected or subsequently processed;
- proof that the above-mentioned operations are brought to the attention, including as far as regards their content, of those to whom the data were communicated or disclosed, except for cases where this duty is impossible or entails a use of means that is manifestly disproportionate in relation to the right protected.
- The user is entitled to file a complaint with the competent supervisory authority for personal data protection or to launch legal proceedings.
- The user has the right to receive their data in a structured format that is commonly used and machine-readable and, where technically feasible, to obtain the transfer thereof, without hindrance, to another controller. This provision is applicable when the data are processed with automated tools and the processing is based on the consent of the user, on a contract to which the user is party, or on contractual measures connected to them.
- The user can obtain restriction of processing. When certain conditions occur, the user may request the restriction of the processing of their own data. In this case, the Controller will not process the data for any other purpose if not for their storage.
- The user has the right to access their own data. The user has the right to obtain information on the data processed by the controller, on certain aspects of the processing, and to receive a copy of the data processed.

Finally, the user has the right to object, in whole or in part:

- on legitimate grounds, to the processing of personal data that concern them, even if pertinent to the purpose of the collection;
- to the processing of personal data that concern them in order to send advertising or direct sales material or to carry out market research or commercial communications.

The users should be aware that, where their data are processed with direct marketing purposes, they may object to the processing without providing any grounds. In order to discover whether the Controller processes data with direct marketing purposes, users may refer to the respective sections of this document.

### 7. Duration of storage of the user's personal data

The Controller will store the personal information of the user subscribed to the newsletter for the whole time in which the subscription remains active. The Controller will, in addition, store the additional personal information of the user for the whole time necessary to fulfil the related duties under the law, to resolve disputes and to execute the agreements concluded.

When the processing is based on the consent of the user, the controller may store the personal data for longer, until said consent is withdrawn. In addition, the Controller could be obliged to store the personal data for a longer period in compliance with a legal obligation or according to an authority's order.

At the end of the storage period, the personal data will be deleted. Therefore, upon the expiry of this term, the right of access, deletion, rectification and the right to the portability of the data may no longer be exercised.

### 8. Information

The user may exercise the rights mentioned above at any time by forwarding a simple request to the Controller by means of a registered letter, fax, or email to the details indicated above. The Controller will contact the user, or inform them thereof, in the shortest time possible and, in any case, within 15 (fifteen) days from the date of the request.

# **Cookie Policy**

The Controller uses Cookies. In order to find out more and to view the detailed policy, the user may consult the <u>Cookie Policy</u>.

### Additional information on processing

# LEGAL DEFENCE

The Controller may use the personal data of the user in legal proceedings, or in the preparatory phases thereto, to defend against the User's abuses in using the Controller's website or the associated services. The user declares that they are aware that the Controller could be obliged to reveal their data by order of the public authorities.

# **SPECIFIC POLICIES**

Upon the request of the user, in addition to the information contained in this privacy policy, the Controller could provide the user with additional, contextual information concerning specific services, or the collection and processing of personal data.

# SYSTEM AND MAINTENANCE LOGS

According to necessities linked to operation and maintenance, the Controller and any third-party services used by it, may collect system logs, i.e. files that record interactions and that may also contain personal data, such as the user's IP address.

# **INFORMATION NOT CONTAINED IN THIS POLICY**

Additional information in relation to the processing of personal data may be requested at any time from the Data Controller using the contact details.

# **RESPONSE TO "DO NOT TRACK" REQUESTS**

The Controller does not support "Do Not Track" requests. In order to discover whether any third-party services used support them, the user is invited to consult their respective privacy policies.

## AMENDMENTS TO THIS PRIVACY POLICY

The Data Controller reserves the right to make changes to this privacy policy at any time by providing the users with information thereof on this page and, where possible, on the website and, if technically and legally feasible, by sending a notice to the users through one of the contact details provided to the Controller. Please, therefore, regularly consult this page, referring to the date of the most recent change indicated at the bottom.

If the changes concern processing whose legal basis is consent, the Controller will again collect the consent of the user, if necessary.