

## WEBSITE AND E-COMMERCE PRIVACY INFORMATION NOTICE

In accordance with article 13 of the Legislative Decree no. 196 of 30.06.2003 (“Personal Data Protection Code”) and article 13 of Regulation (EU) 2016/679 (“General Data Protection Regulation”) sets out below the privacy information notice on the processing of personal data.

Unitronitalia Instruments Srl, with registered office at Via Giovan Battista Gandino 37-39-41 – 00167 – Roma, VAT: 10878271005, represented by Giovanni Alberto Quarra Sacco, as Data Controller, pursuant to article 13 of the Legislative Decree no. 196 of 30.06.2003 (hereinafter, “Privacy Code”) and article 13 of Regulation (EU) 2016/679 (hereinafter, “GDPR”) informs you that your personal data will be processed according to the following methods and for the following purposes:

### **1. SUBJECT**

The Data Controller protects your personal data and complies with all the applicable regulation on personal data protection (Privacy Code and GDPR). Your personal data will be protected and only shared with third parties pursuant to this Privacy Policy or with your consent. We process your personal data to manage your registration and interaction with the Site.

In particular, we process:

- 1) Contactual information (your name, fiscal code, VAT, email address and telephone/mobile number – hereinafter, “personal data” or “data”) provided through the registration and/or request to purchase the products sold through the website;
- 2) Other data acquired – within the limits set out by article 14, paragraph 5, GDPR – in connection with internet communication protocols (for example, access to the website, amount of data transferred, status message, ID session number, IP address, URL address, etc.). such data allow us to track your visits to our website.

### **2. THE PURPOSES OF DATA PROCESSING**

Your personal data will be processed:

A) without your express consent (article 24, lett. a), b), c), Privacy Code and article 6, lett. b), e), GDPR), for the following Service Purposes:

1. To process a contract request or a preliminary request;
2. To execute preliminary measures you required;
3. To develop statistics for internal use;
4. To fulfill tax obligations arisen from ongoing contractual relationships;
5. To fulfill obligations provided by laws, regulations, European regulations or order of an Authority;
6. To safeguard vital interests of the data subject or other person;

7. To perform tasks of public interest or related to the exercise of public authority vested in the data controller;
8. To prevent or discover fraudulent activities or abuses of the website;
9. To pursue a legitimate interest of the Data Controller or a third party, pursuant to article 6, lett. f), GDPR;
10. To exercise the Data Controller rights (for example, right of defence in Court);

B) with your specific and unambiguous consent only (articles 23 and 130, Privacy Code and article 7, GDPR), for the following Marketing Purpose:

1. To send by email newsletter, commercial communications and/or advertising material regarding products and/or services, different from those already purchased and offered by the Data Controller.

### **3. NATURE OF THE PROVISION OF PERSONAL DATA**

The provision of your personal Data or the purposes described in point 2. Let. A), no. I) and ii) above is necessary. Without the data we cannot guarantee your registration on the Website nor the acceptance of your requests.

On the contrary, the provision of your Data for the purposes described in point 2, lett. b) is optional. You may decide not to provide any data or withdraw the consent to process data already provided. In such case, you will not receive our newsletter, while you will continue to receive our services and you will have right to register on the website.

### **4. DATA PROCESSING METHODS**

Your personal data are processed through the operations described in article 4, Privacy Code and article 4, no. 2) GDPR, and namely: collection, registration, organization, storage, consultation, modification, selection, extraction, comparison, use, interconnection, block, transfer, cancellation and destruction of data. Your data will be processed according to principles of fairness, lawfulness and disclosure and may be processed through automatic methods aimed at memorizing, handling and transferring and will be processed through instruments adequate to ensure safety and privacy through procedures meant to avoid the risk of loss, unauthorized access, illicit use and transfer.

### **5. DATA RETENTION PERIOD**

The data will be kept for no longer than required for the purposes described above and in any case for no longer than 2 (two) years for the data collection for Marketing purposes. Then, the data will be destroyed or made anonymous.

## **6. DATA ACCESS**

The personal data processed by the Data Controller will not be transferred or disclosed to indeterminate subjects, in any possible form, including the provision or simple consultation. On the contrary, the data may be disclosed to the Data Controller employees and external collaborators. In particular, your data may be disclosed to:

1. Employees and collaborators of the Data Controller, consultants authorized to manage the site and provide related services (for example: customer care service, IT department, ecc.), in their capacity internal Managers and/or Persons in charge of the processing of personal data and or system Managers;
2. Other companies or persons (for example: credit institutions, professional firms, consultants, insurance companies, etc.) which carry out outsourcing activities for the Data Controller, in their capacity external Managers and/or Persons in charge of the processing of personal data.

Your personal data may also be disclosed, within the strictly necessary limits, to third parties authorized to access them in force of law, regulations or European regulations.

## **7. DATA DISCLOSURE**

The Data Controller may disclose your data without your express consent (pursuant to article 24, let. a), b), d), Privacy Code and article 6, lett. b), c), GDPR), for the purposes hereby indicated, to SUPervisory Authorities, Judicial Authorities and any other subject when mandatory by law or necessary for the mentioned purposes.

## **8. TRANSFER OF DATA**

The personal data will be processed and stored on the server of the Data Controller and/or third companies charged and appointed as Persons in charge of the processing of personal data, with registered office in the European Union area or pursuant to articles 45 and following, GDPR. At the moment the server is in the European Union area. The data will not be transferred outside the European Union area. It is understood that, whenever it should be necessary to transfer the server in Italy, in the European Union area or outside it, the transfer will take place pursuant to articles 45 and following, GDPR. In such case, the Data Controller guarantees from now on that the data transfer outside the European Union area will take place pursuant to the applicable laws, concluding, if necessary, agreements to guarantee an adequate level of protection and/or adopting standard contractual clauses provided by the European Commission.

## **9. BROWSING DATA**

The informatic systems and the software procedures for the website functioning may acquire, during their normal activity, some personal data whose provision is implicit in the use of Internet communication protocols. These information are not collected to be associated with identified interests, but may allow to identify the users, through processing and in association with data held by third parties (i.e. parameters relating to the operating system and the user's IT environment).

Such data are used by the data Controller only to receive anonymous statistic information regarding the use of the website and to check its regular functioning and they are deleted immediately after they are processed. Such data may also be used to ascertain any responsibility related to computer crimes.

## **10. COOKIES**

When using our website, the cookies are stored on your personal computer. Cookies are small text files that are saved on your computer and provide us with certain information. They are broadly used in order to allow website to function more efficiently and to improve the user's experience, and also to provide certain information to the website owner. Our website uses cookies which remain on your computer for different periods of time. Some cookies expire at the end of the session while others remain for a longer period so that when you visit our website again you can benefit from a better experience as user. Web browser allow to control Cookies through the browser's settings. Most of the browsers allow to disable Cookies or block Cookies from a specific website. Browsers can also help you to delete Cookies when you close the browser. However, please consider that this may determine the loss of any opt-out or preferences set in the website. We invite you to read the technical information regarding your browser for further instructions. If you choose to disable the Cookies or refuse a cookie, some parts of the service may not function correctly or may be slower.

## **11. RIGHTS OF DATA SUBJECTS**

In your capacity of data subject, you have the rights provided by article 7, Privacy Code and article 15, GDPR, namely you have the right to:

1. ask the Data Controller for confirmation that your personal data exists, although not registered yet, and for the communication of such data;
2. ask information about: a) the origin of the personal data; b) the purposes and the method of their processing; c) the ratio of the processing through electronic instruments; d) the identification data of the Data Controller, the person in charge of the processing of personal data and the representative appointed pursuant to article 5, paragraph 2 Privacy Code and article 3, paragraph 1, GDPR; e) the subjects or categories of subjects to whom the personal data may be disclosed or who can acquire them as representative appointed in the State area, managers or agents;

3. ask for: a) the update, rectification or, when interested, integration of data; b) the cancellation, transformation into anonymous form or block of the data processed in violation of the law, including those that do not need to be kept for the purposes for which the data were collected or subsequently processed; c) the acknowledgement that the operations described in lett. a) and b) above were communicated, also regarding their content, to those to whom the data has been communicated or disseminated, except in the case in which this fulfillment proves impossible or involves the use of means manifestly disproportionate to the protected right;
4. object, totally or partially, to: a) the processing of your personal data, although relevant to the purposes of the collection, for legitimate reasons; b) the processing of your personal data for sending advisory materials or for direct sale or market research or commercial communication, through automatic system of calling without an operator, email and/or traditional marketing methods through telephone and/or ordinary mail. The objection right provided by point b) above for direct marketing purposes also applies to the traditional marketing and, in any case, it is always possible to object partially. Therefore, the interested party may decide to receive communications only through traditional methods or authorized communications only or automatic communications only, or none of the two.

When applicable, you also have the rights provided by articles 16-21 GDPR (Right of rectification, right to be forgotten, right to restrict the processing, right to data portability, right to object), and right to file a complaint with the Supervisory Authority.

## **12. EXERCISE OF THE RIGHTS**

You have the right to ask the Data Controller to access, rectify or cancel your data, to integrate incomplete Data, to restrict the processing; to receive the Data in a structured format, in common use and readable by an automatic device; to withdraw the consent given regarding the processing of your sensitive data in any moment and object totally or partially the use of your data; to file a complaint with the competent Authority, and exercise the rights provided by the applicable laws.

You can exercise your rights in any moment by sending:

a certified mail to: Unitronitalia Instruments Srl, Via Giovan Battista Gandino 37-39-41 – 00167 Roma (RM);  
a certified email to the address [contact@pec.unitronitalia.com](mailto:contact@pec.unitronitalia.com)

## **13. MINORS**

If the person who provides the data is younger than 18 years old, the processing is lawful if this consent is given or authorized by the parents.

#### **14. DATA CONTROLLER, MANAGER AND AGENTS**

The Data Controller is UnitronItalia Instruments Srl, having its registered office in Via Giovan Battista Gandino 37-39-41 – 00167 – Roma, VAT: 10878271005, represented by Giovanni Alberto Quarra Sacco.

The updated list of managers and Persons in charge of the processing of personal data is kept in the registered office of the Data Controller.

#### **15. DPO – DATA PROTECTION OFFICER**

\_\_\_\_\_. Contacts: email \_\_\_\_\_; tel. \_\_\_\_\_

#### **16. CHANGES TO THIS NOTICE**

This notice may be changed. We suggest you to regularly check it and refer to the updated version.

#### **17. PLACE AND DATE**

Rome, \_\_\_\_\_