

Information notice delivered to website users for processing of Personal Data provided by them

Pursuant to Art. 13 of EU Regulation No.2016/679 (General Data Protection Regulation - GDPR), a description is provided below of how the website www.proelia.it is managed with reference to processing of Personal Data of those who interact with its web services, accessible electronically from such address. This information notice is delivered only for the above mentioned website and not for any other website which the user may consult following a link.

Identity and contact data of the Data Controller.

Here are our contacts for any further information.

- The Data Controller is: Proelia Sistemi S.r.l., in the person of its pro tempore representative.
- The Data Controller may be contacted by email at the address: privacy@proelia.it.

Purpose of the processing of the data and its legal grounds.

Here is why we are asking for your personal data.

The data you provide when navigating the company website are collected so as to make the functions of the website available after the user has entered it and to collect information freely delivered by the data subject.

Especially, your personal data will be processed:

(i) without your consent (article 6 [b,c,f] GDPR) for the following purposes:

- The information systems and software procedures for operating this website, during their ordinary operation, acquire some personal data, transmission of which is implicit in the use of Internet communications protocols.
- These data (such as, by way of example, domain names, IP addresses, OS used, browser device type used for connection) are not accompanied by any additional personal information and are used to: a) collect anonymous statistical information about use of the website; b) manage control requirements for the use of the website; c) ascertain responsibility in hypothetical cases of Internet crime.
- The legal grounds for processing these data are the need to make the functions of the website available after access by the user.

Providing the data for the purposes under section (i) above is obligatory. Should you not accept the use of such data you must not surf the company website.

Furthermore, your personal data will be processed:

(ii) with your consent (article 7 GDPR) for the following purposes:

- The personal data provided by the user on forms are collected and processed to perform activities involving relations with the data subject. In case of CVs, exclusively for purposes of selection.

Provision of the data for the purposes under section (ii) above is optional, meaning you may decide not to put in any data and go on surfing the company website.

Categories of personal data processed.

Following are the kinds of personal data we ask for.

In the context of the purposes of processing described in the previous paragraph, processing will be carried out only on personal data falling into the following categories and acquired directly from the data subject:

NAVIGATION DATA

Software applications used to operate the website www.proelia.it acquire some personal data transmitted through Internet communications protocols.

This information is not collected in order to be associated with identified data subjects, but, through processing and association with data held by third parties, could allow identification of users.

This data category includes IP addresses or name dominions of computers used by users connecting to the website, addresses in URI (Uniform Resource Identifier) notation of the requested resources, time of request, method used to submit the request to the server, size of the file obtained in reply, numerical code indicating the state of the reply given by the server (for example successful, error, etc.) and other parameters referring to the operating system and IT environment of the user.

These data are used only to collect anonymous statistical information about use of the websites and to check their proper operation.



DATA VOLUNTARILY PROVIDED BY THE USER.

Optional and voluntary provision of one's email address to the addresses shown on the website, necessary for answering requests, or of any other personal data contained in the message, may be required to access certain services delivered by the website www.proelia.it such as reserved area, newsletters, complaints, taking part in surveys, registering for conferences and training courses.

Specific summary information notices will be listed or displayed on the website pages set up for special on-demand services. The period of retention of such data is defined by the criterion of request for erasure of information voluntarily provided by the user; concerning technical data managed by the website, the period is defined by the technical features of the cookies defined in the paragraph below on Duration of the Cookies (Art. 13 [2.a]).

USE OF COOKIES.

The website www.proelia.it uses cookies and similar technologies to guarantee proper operation of the procedures and improve experience with using online applications.

DEFINITIONS

Cookies are small-sized strings of text which websites visited by the user send to his terminal (usually to the browser) where they are stored to be resent to the same websites on the next visit by the same user. Cookies are stored, depending on the user's preferences, by the individual browser on the specific device used by him (computer, tablet, smartphone).

According to their features and use, cookies can be subdivided into several categories:

STRICTLY NECESSARY COOKIES

These are cookies which are indispensable for managing login and access to reserved functions of the website, typically by the website editorial staff to update pages. Duration of these cookies is strictly limited to the working session (they will be erased when the browser is closed).

Deactivation of the cookies will compromise use of services accessible through login. However, the public part of the website www.proelia.it can be used normally.

"TECHNICAL" COOKIES (FOR ANALYSIS AND PERFORMANCE)

These cookies are used to collect and analyse website traffic and use anonymously. These cookies, though they do not identify the user, allow for example for discovering whether the same user comes back to the website at different times. They also allow one to monitor the system and improve its performance and usability.

On some pages of the website www.proelia.it these cookies can record user preferences concerning font size and manner of viewing (graphs, high contrast, text) in order to make the contents accessible. Such cookies may be deactivated without any loss of function.

PROFILING COOKIES.

These are permanent cookies used to identify (anonymously or not) the user's preferences and improve his navigation experience.

The www.proelia.it website does not use cookies of this kind.

DURATION OF COOKIES.

Some cookies (session cookies) remain active only until the browser closes or the user logs out. Some cookies "survive" closing the browser and are also available at later visits by the user. These are called persistent cookies and their duration is set by the server at the time they were created. Some have a set expiry, others are unlimited.

When navigating on the pages of the www.proelia.it website, one may interact with third party websites which can create or modify persistent cookies and profiling cookies.

MANAGEMENT OF COOKIES.

The user may decide whether or not to accept cookies using the settings on his browser.

Totally or partially disabling technical cookies will not compromise the working of the www.proelia.it website.

Settings may be defined specifically for different websites and web applications.

Here are the online guides on how to proceed with the main browsers:

- Chrome: <https://support.google.com/chrome/answer/95647?hl=it>
- Firefox: <https://support.mozilla.org/it/kb/Gestione%20dei%20cookie>
- Internet Explorer: <https://support.microsoft.com/it-it/help/17442/windows-internet-explorer-delete-manage-cookies>
- Opera: <http://help.opera.com/Windows/10.00/it/cookies.html>
- Safari: http://support.apple.com/kb/HT1677?viewlocale=it_IT



GOOGLE ANALYTICS.

The website includes components transmitted by Google Analytics, a web traffic analysis service provided by Google Inc. ("Google"). These are third party cookies used to collect and analyse anonymously information on how the website is used by visitors. These cookies are used to record non-personal information.

Google Analytics safeguards the confidentiality of its data in various ways:

- The terms of service of Google Analytics, which all users of Google Analytics must comply with, forbid delivering personal information to Google Analytics. Personal information includes all the data which Google might in all likelihood use to identify an individual, including by way of example and not limitation, names, email addresses or invoicing data.
- It is forbidden to provide the Google Analytics data to third parties without consent by the customer, except in certain specific circumstances, as when requested by law.
- Google's security experts protect the data from outside threats.
- In-house access to the data (e.g. by employees) is strictly regulated and subject to controls and access procedures by the employees.

For further information, refer to the link: <https://support.google.com/analytics/answer/6004245>.

The user may selectively disable action by Google Analytics installing on his browser the opt-out component provided by Google.

For further information and to disable the action by Google Analytics, please refer to the link: <https://tools.google.com/dlpage/gaoptout>.

THIRD PARTY COOKIES (SOCIAL MEDIA).

Visiting a website one can receive cookies both from the visited website ("proprietary") and from websites managed by other organisations ("third parties"). An example are the "social plugins" of Facebook, Twitter, Google+ and LinkedIn. These are parts of the visited page generated directly by the above mentioned websites and integrated into the host site. The most common use of social plugins is to share contents on the social network.

The presence of these plugins involves transmitting cookies from and to all websites managed by third parties. Management of information collected by "third parties" is disciplined by the relevant information notices to which we ask you to refer. To guarantee greater transparency and ease of use, here are the URLs of the various information notices and information on how to manage cookies:

- Facebook information notice: <https://www.facebook.com/help/cookies/> (setting): access your account. Privacy section
- Twitter information notice: <https://support.twitter.com/articles/20170514> (setting): access your account. Settings, Security and Privacy Section
- LinkedIn information notice: <https://www.linkedin.com/legal/cookie-policy> (setting): access your account. Account and Settings, Privacy and Settings Menu
- Google+ information notice: <http://www.google.it/intl/it/policies/technologies/cookies/> (setting): <http://www.google.it/intl/it/policies/technologies/managing/>
- Pinterest information notice: <https://about.pinterest.com/it/privacy-policy>
- Instagram: <https://instagram.com/legal/cookies/>

Categories of addressees of the personal data.

Below you will see who may process your personal data and to whom they may be notified.

The data you provide may be made available for the purposes mentioned above:

- To employees and collaborators of the Data Controller, as individuals authorised to process data (or so-called "parties appointed to carry out the processing").
- To third parties working on behalf of the Controller, in their role as independent Data Controllers, Co-Controllers or Data Processors, to carry out financial activities (commercial, management, management of information systems, insurance, banking and non-banking brokerage, factoring, correspondence, management and safeguarding of credit) or to perform legal duties (chartered accountants, lawyers).
- To Court Authorities and monitoring authorities, administrations, public bodies and entities (national and foreign).
- To other legal bodies which the Data Controller may belong to.

You may ask for the updated list of parties who may receive the data by writing to the email address privacy@proelia.it.



Manner of processing.

Here is how your personal data will be processed.

Your personal data is processed by means of operations (collecting, recording, organising, structuring, updating, retaining, adapting or modifying, extracting and analysis, consultation, using, communicating by transmission, comparing or interconnecting, limiting, erasure or destruction) performed either digitally (on server and cloud, properly protected and located within the European Union, belonging to and/or available to the Controller and/or third parties charged by him, duly appointed as data Processors).

General principles.

Following are the general aspects of personal data processing.

The data will be processed in a licit, correct and transparent manner regarding the data subject, collected for the purposes indicated above, limited and retained as long as necessary with suitable security measures.

The data will not be transferred to countries outside the European Union.

Your personal data will not be disseminated outside the categories of addressees specified above.

Your data will not be processed for automatic decision-making processes.

In case of unlawful processing of personal data which can represent a high degree of risk for the rights and freedom of individuals, the Data Controller will let you know without undue delay.

Retention period of the personal data.

Here is how long your personal data will be retained.

The personal data collected for the purposes shown in the relevant paragraph above will be processed and retained for no more than 5 years or for the duration of any contract relationship which may have been set up. Starting from the date of termination of any contract relationship, for whatever reason or cause, the data will be kept for the duration of the prescribed terms which may be applied under the law or for the time needed to fulfil the purposes above.

Rights which may be exercised.

Following are all the rights we guarantee to you concerning your personal data.

In compliance with the provisions of GDPR (III,1), you may exercise your rights shown there, especially:

- **RIGHT TO INFORMATION:** Right to receive all information concerning processing in a concise, transparent, intelligible and easily accessible form (this information notice).
- **RIGHT TO ACCESS:** Obtain confirmation whether or not data processing is taking place concerning you and, in this case, receive relevant information especially concerning: purpose of the processing, categories of personal data processed and period of retention, addressees to whom they may be notified (Art.15 GDPR).
- **RIGHT TO RECTIFICATION:** Obtain rectification of your personal data and addition of incomplete data (Art. 16 GDPR), the controller being obliged to notify such changes.
- **RIGHT TO ERASURE (so-called right to be forgotten):** Right to request erasure of the data when the purpose of the processing has been completed, when consent has been withdrawn, processing has been objected to, the data have been processed unlawfully (Art. 17 GDPR).
- **RIGHT TO LIMITATION:** Right to limit treatment of your data in case of errors, complaints or as an alternative to erasure (Art. 18 GDPR).
- **RIGHT TO DATA PORTABILITY:** Receive your personal data provided to the Controller and transfer your data to another Controller in the cases provided for by Art. 20 of the GDPR.
- **RIGHT TO OBJECT:** Right to object at any time to processing of your personal data processed on the grounds of a public interest or of the Controller, unless there are legitimate grounds (Art. 21 GDPR).
- **RIGHT TO LODGE COMPLAINT WITH THE AUTHORITY FOR THE PROTECTION OF PERSONAL DATA:** Garante per la protezione dei dati personali - Piazza di Monte Citorio n. 121, 00186 ROME (RM).

You may exercise such rights (except for the last one) simply sending a request by email to the address of the Data Controller as above.

Consent:

Apart from what has been specified for navigation data, the user is free to provide the personal data requested to make use of services delivered by web - reserved area, newsletters, complaints, taking part in surveys, registering for conferences and training courses.

Failure to provide the data in the fields marked with an asterisk may make it impossible to use the service being offered (Art.13 [2.e]).