



PRIVACY POLICY

articles 13 and 14, General Data Protection Regulation EU 2016/679 ("GDPR")

The following information is provided pursuant to Articles 13 and 14 of the EU Regulation 2016/679 ("GDPR") to those who have access to the website www.gastaldi-int.it ("Site").

This information describes how the Site is managed, with reference to the processing of users' personal data, insofar as, as a result of its consultation and/or navigation within it, data relating to identified or identifiable persons may be processed.

The information is provided only for the Site and not also for other websites that may be consulted by the user through the links contained therein.

Gastaldi International S.r.l. (henceforth also "Gastaldi" or, simply, "the Company" or "the Controller") with registered office in Mura Santa Chiara, 1 - 16128 Genova (GE), is the Controller, pursuant to Article 4, no. 7, and 24, of the GDPR, of the processing operations carried out within this Site, on the data of the subjects who access the Site or navigate and/or request services through the Site itself.

The data processing will be carried out by employees or collaborators of the Company however operating as authorized subjects of the processing.

1. DATA PROCESSING PURPOSES

The processing of personal data will be conducted for purposes of:

- 1. management of the user's requests;
- 2. management of the Website itself.

Legal basis of processing and data retention

The legal basis of the purposes illustrated is to respond to a request from the user (purpose 1) and the legitimate interest of the Data Controller in the proper functioning of the Site (purpose 2).

The data that the user transmits through the email address <u>info@gastaldi-int.it</u> is processed in order to fulfill the request received.

The email data retention follows the criteria of periodic management and archiving, activated in case of saturation of the available email storage.

1.1 PERSONAL DATA PROCESSED

The mere consultation of the Site does not in itself involve the collection or processing of users' personal data except for browsing data and data voluntarily provided by users.

Browsing data

The computer systems and software procedures used to operate the Site acquire, during their normal operation, some data whose transmission is implicit in the use of Internet communication protocols.

This is information that does not allow the user/data subject to be directly identified, but which can, through processing and association with data held by third parties, allow the identification of users/data subjects.





This category of data includes the IP addresses or domain names of the computers used by users who connect to the Sites, the addresses in URI (Uniform Resource Identifier) notation 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, error, etc.) and other parameters relating to the operating system and the user's IT environment.

These data are not disclosed, but are used for the sole purpose of obtaining anonymous statistical information on the use of the Site and/or to check its correct functioning and are kept for the time necessary to pursue the purposes illustrated. Furthermore, the data could, in any case, be used to ascertain responsibility in the event of criminal or in any case illegal activities perpetrated against the Site or through it.

Optional provision of data and processing of data provided voluntarily by the user/data subject

Sending messages through the contact email box of this Site involves the subsequent acquisition of the sender's email address, necessary to reply to email communications, the name (corresponding to the email used) and what is inserted in the text of the message.

It is understood that if, for any reason, the communications forwarded by the user/data subject should be unnecessary with respect to the processing that the Company carries out/intends to carry out for its users, Gastaldi reserves the right to proceed with the immediate cancellation of the data or in any case to process the data to avoid organizational and legal repercussions that are deemed to be in conflict with the Company's personal data management system.

Specific Notices (following articles 13 and 14 of the GDPR) will be shown if necessary if Gastaldi should proceed with processing not attributable to this Privacy policy.

2. SCOPE OF COMMUNICATION

The data described above will be processed by Gastaldi or by subjects designated as data processors (article 28 of the GDPR), in the Italian territory or in the European Union. They will also be communicated to third parties responsible for providing services connected to the activities of the Site and, in particular, to:

- WILDCARD Service s.r.l.: site hosting;
- PIXEL Studio: cookie management;

that process data for the purpose under paragraph 1 (§ 1).

3. METHODS OF PROCESSING

The data generated during navigation on the Site are processed with automated tools, for the time strictly necessary to achieve the purposes for which they were collected, after which they will be deleted or anonymized.

In any case, the data processing will take place with the aid of tools and procedures suitable for guaranteeing its security and confidentiality in compliance with the GDPR. Specific security measures are observed to prevent data loss, illicit or incorrect use and unauthorized access.

4. TRANSFER OF DATA OUTSIDE THE EU

Your data are not processed outside the EU and/or the European Economic Area, however, in the event of transfer of personal data outside EU, Gastaldi International will be responsible for





ensuring that such transfers take place in compliance with the provisions of the articles 44 et seq. of EU Regulation 2016/679.

5. RIGHTS OF THE DATA SUBJECT

You may, at any time, exercise the rights referred to in articles 15-22 of the GDPR and, in particular:

- access your personal data;
- ask for the rectification and/or erasure of the information that we hold/process about you;
- object to the processing of your information;
- request a copy of the information we hold/process about you;
- withdraw consent to our processing of your information (to the extent that such processing is based on consent)
- obtain restriction of our processing of your information;
- ask for personal data you have made available to us to be transferred to you or a third party in machine-readable formats; and
- ask for data portability.

Some of these rights are not absolute: they do not always apply and exemptions may be engaged. We may, in response to a request ask you to verify your identity and to provide information that helps us to understand your request better.

The data subject also has the right to lodge a complaint with the Supervisory Authority (in Italy it is the Italian data protection authority) with registered office in Piazza Venezia 11, Rome (00187) and email protocollo@gpdp.it.

To exercise the aforementioned rights or to request further information regarding the processing and communication of personal data provided directly or otherwise acquired, you can contact the Data Controller at its office located in Mura Santa Chiara, 1 - 16128 Genova (GE) or to the email privacy@gastaldi-int.it.

Changes in the information provided on this notice

Gastaldi International reserves the right to modify the present privacy notice, publishing the changes on its institutional website, therefore data subject are advised to periodically check this information.

Gastaldi International S.r.l.