

## **PRIVACY POLICY - PRIVACY INFORMATION**

### **Information pursuant to art. 13 of the Regulation (EU) n. 679/2016 ("GDPR")**

We consider privacy of fundamental importance and we try to ensure that the processing of personal data takes place in compliance with fundamental rights and freedoms, as well as the dignity of the person concerned, with particular reference to privacy, personal identity and the right to protect personal data.

To this purpose we have adopted and implemented a Privacy Policy that regards the methods for managing activities involving personal data processing.

This Privacy Policy explains how and why we collect, record and use information and choices that can be made about how this information is collected and used.

Please read carefully this document in order to check for any updates or revisions that may become necessary.

As required by the European Union Regulation no. 679/2016 ("GDPR"), and in particular to the art. 13, below we provide the user ("Party Concerned") with the information required by law concerning the processing of her/his personal data.

### **Scope and consent**

In this Privacy Notice for users are described the methods of acquisition, use, transmission, storage, protection of personal information, independently from how it is accessed and used, for example via mobile devices. By using the information forms request or sending e-mails you accept the provisions of the present Privacy Policy for users and consent to the acquisition, use, transmission, storage and protection of your personal data.

### **Personal data**

"Personal data" means information and / or data that may be associated with a specific person and which could be used to identify her/him, also in combination with other data held. The data or information made anonymous or aggregated is not considered personal if they can't permit the identification of a specific physical person, even in combination with other information or in other ways.

## **SECTION I**

**Who we are and what data we process (article 13, paragraph 1 letter a; article 15, letter b GDPR)** SOLARI PINO & VERO SNC, in the person of its legal representative Mr. Pino Solari, located in Prato Carnico (UD), Zona Artigianale Chiampeas, operates as Data Controller and can be contacted at [solari@solarigruppo.com](mailto:solari@solarigruppo.com), collects and / or receives data and/or information concerning the Party Concerned, limited to personal data: name, surname, any company name, physical address, nationality, province and municipality of residence, phone, fax, address and email.

SOLARI PINO & VERO SNC does not in any way require the Party Concerned to provide "special" data, that is, according to what expected from GDPR (Art. 9), personal data that can reveal racial or ethnic origin, the political opinions, religious or philosophical convictions, or trade union membership, as well as genetic data, biometric data intended to identify in a univocal way the person, data concerning health or a sexual life, including sexual orientation.

SOLARI PINO & VERO SNC through its website [www.solarigruppo.com](http://www.solarigruppo.com) does not require a registration, but only requires the submission of requests for information or in-depth information on the products.

Mere statistical analyses can be performed on how access or use the services of the site only through aggregations of previously anonymous data.

Any purpose other than those listed above will be specified at the time of data collection.

## SECTION II

### **For what purposes we need Party Concerned's data (Article 13, paragraph 1 of the GDPR)**

The data are used by the Data Controller to manage the contact requests sent by Party Concerned, to provide assistance, to comply with the legal and regulatory obligations to which the Data Controller is held according to the activity carried out. In no case SOLARI PINO & VERO SNC resells the data personal the involved to other parties neither there uses for purposes not declared.

In relation to the aforementioned purposes, the processing of personal data, which may consist in the collection, registration, organization, storage, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, cancellation or destruction, takes place according to correctness and with the utmost confidentiality, using

- information technology tools;
- telematics or electronic tools;
- other systems of telecommunications tools;
- paper tools

in order to guarantee the security and confidentiality of the data, as well as full compliance with the current law and the GDPR.

In particular the Party Concerned 's data will be processed for:

#### **a) registration and/or requests of informative material**

With the only aim to provide all the information Party Concerned needs to understand better our products and / or services, we need to know and consequently collect some personal data such as: name and email address to provide all required clarifications. Any other data that can concern this regulation - provided anyway spontaneously by Party Concerned (that is then not strictly needed for the fulfilment of services) - will be anyway stored and processed in the same way.

The treatment of personal data is used to give the customer (or the applicant) information and every time it's necessary to contact and / or send her/him general information, as well as for the fulfilment of every other obligation arising.

The legal basis of these treatments is the fulfilment of the services inherent to the request for registration, information and contact and / or sending of informative material and compliance with legal obligations.

#### **b) promotional activities on Services / Products similar to those of interest (according to art. 47 GDPR)**

The data controller, even without your explicit consent, can use the contact details provided by Party Concerned, for the purpose of direct sale of its Services / Products, limited to the case in which whether of Services / Products similar to those objects of the sale, unless the Party Concerned does not explicitly deny.

#### **c) the commercial promotion activities on Services / Products different from those of interest**

The personal data of the Party Concerned may also be processed for purposes of commercial promotion, for surveys and market research with regard to Services / Products that the Holder offers only if the Party Concerned has authorized the treatment and is not opposed to this.

This treatment can be automated, in the following ways:

- e-mail;
- SMS;
- telephone contact and can be done:
  1. so far as the Party Concerned not has revoked his consent for the use of data;
  2. if, in the event that the processing takes place through contact with a telephone operator, the Party Concerned not signed up to the register of the opposition of which to the DPR n. 178 / 2010;

The legal basis of such processing is the consent given by the Party Concerned prior to the processing itself, which can be revoked by the Party Concerned freely and at any time (see Section III).

#### **d) computer security**

The Owner, in line with the provisions of Recital 49 of the GDPR, treats, also through its suppliers (third parties and / or recipients), the personal data of the Party Concerned as far as strictly necessary and to ensure its safety of the networks is information, that is the capacity of a network or of an information system to resist, to a given level of safety, to events unexpected or illicit or malicious acts that compromise the availability, authenticity, integrity and confidentiality of personal data stored or transmitted.

The Holder will inform promptly the Interested, so far as there a particular risk of violation of his/her data without prejudice to the obligations deriving from the provisions of art. 33 of the GDPR related to data breach notifications.

The legal basis for such processing is compliance with legal obligations and the legitimate interest of the owner to carry out treatments inherent to protect safety of premises and systems.

**e) profiling**

The personal data **will not** in any way be treated for finality of profiling (such as analysis of data transmitted and/or of Services / Products selected or chosen, to propose messages Advertising and / or commercial proposals in line with the choices made by users same)

**f) fraud prevention (according to art. 47 and art. 22 GDPR)**

The personal data transmitted, excluded particular ones (Art 9 GDPR) or judicial (Art 10 GDPR), will be processed to allow controls to monitor and prevent fraudulent payments,

The personal data collected to just prevent fraud will be immediately deleted by the term of the phases of control.

In relation to the situations expressed above, we undertake to use your personal data only in the manner, within the terms and for the purposes specified in this Privacy Notice or, where present, in specific Information that from time to time we will submit to Party Concerned express consent.

The above is valid for data:

- collected or supplied directly by the Party Concerned;
- collected at third parties;
- coming to public registers, lists, proceedings or documents knowable from anyone according to the rules.

It is also recalled that the provision of your personal data is mandatory for the stipulation and execution of any contracts - however stipulated after a contact done through the site - and for obligations of law. A possible decline to provide this personal data, albeit legitimate, could compromise the contractual relationship.

**Communication to third parties and categories of recipients (Article 13, 1st paragraph GDPR)**

The communication of the personal data of the Party Concerned takes place principally towards third parties and / or recipients which activity is needed for the performance of the activity inherent to the relationship established. In any case it is subject to obligations of law, such as:

- Thirds providers: Provision of services (assistance, maintenance, Delivery / Shipping products, supply of services additional, providers of networks, services of communication) related to the service request
- Professionals / Consultants external is Society of advice: obligations of law fulfilment, exercise of rights, protection of contractual rights, recovery of credit
- Administration financial, institutions public, authority Judicial, authority of supervision and control: fulfilment of legal obligations, defence of rights; lists and registers held by public authorities or agencies similar in basis to specific legislation, according to contractual obligations
- Subjects formally delegated or with recognized legal title: Legal representatives, curators, etc.

The Holder imposes to these providers the respect of the same level of data treatment measures or even restrictive.

The Holder does not transfer personal data in countries where the GDPR is not applied (non-EU countries). The legal basis of these treatments is the fulfilment of the services inherent to the relationship established, compliance with legal obligations and the legitimate interest of SOLARI PINO & VERO SNC to carry out the necessary treatments for these purposes.

### **SECTION III**

#### **What happens if the Party Concerned does not provide data necessary for the execution of the requested service? (Article 13, paragraph 2, letter and GDPR)**

The collection and processing of personal data is necessary to follow up the requested services as well as the provision of the Service and / or the supply of the requested Product. If the Party Concerned does not provide the personal data expressly provided, the Data Controller will not be able to process the requested services and / or the contract and the Services / Products connected.

#### **How we process the data of the Party Concerned (Article 32 GDPR)**

The Holder adopts adequate measures of safety to preserve confidentiality, integrity and availability of personal data and imposes to third providers similar measures of safety.

The processing your personal data is carried out by operations indicated in article 4, no. 2) of the GDPR - performed with or without the aid of computer systems - namely: collection, registration, organization, structuring, updating, preservation, adaptation or modification, extraction and analysis, consultation, use, communication by transmission, comparison, interconnection, limitation, cancellation or destruction.

In every case, the logic and physics security of data is guaranteed, implementing all the necessary technical and organizational measures to guarantee their safety. A specific internal operating manual has been drawn up; it can be read on <http://www.solarigruppo.com/manual.html> (in Italian)

#### **Where we process the data of the Party Concerned**

The personal data of the Party Concerned are kept in paper, computer and electronic archives at the company headquarters in Prato Carnico or anyway, in relation to the data stored on the server of the email service provider, in EU countries where the GDPR applies.

#### **How long are the data of the Party Concerned stored? (Article 13, paragraph 2, letter to GDPR)**

Unless the Party Concerned expresses his will to remove them, her/his personal data will be kept until they are necessary with respect to the legitimate purposes for which they were collected.

Prescinding from Party Concerned determination to their removal, personal data will be in every case preserved second the terms expected from current regulations and / or come on regulations national.

Furthermore, personal data will in any case be kept for the fulfillment of the obligations (i.e. fiscal and accounting) that remain even after the termination of the contract (Article 2220 of the Civil Code); for these purposes the Data Controller will retain only the data necessary for the relative prosecution.

#### **What are the rights of the Party Concerned? (Articles 15 -20 GDPR)**

The Party Concerned has the right to obtain from the data holder the following:

a) the confirmation that it is or is not underway the processing of personal data concerning her/him and, in this case, obtaining access to personal data and to the following information:

- 1) the purposes of treatment;
- 2) the categories of personal data in question;
- 3) the recipients or categories of recipients to whom the personal data have been or will be communicated;
- 4) when possible, the period of storage of data personal expected or, if not possible, the criteria used to determine this period;
- 5) the existence of the data subject's right to request correction or deletion by the data holder of personal data or their limitation of the treatment that concern or of oppose to their treatment;
- 6) the right to complaint to authority of control;
- 7) if the data are not collected from the Party Concerned, all information available on their origin;

b) the right of get a copy of data personal object of treatment, if this is not prejudicial to the rights of others; In case of more copies requests by the Party Concerned, the holder of the treatment can charge a reasonable fee contribution based on administrative costs.

c) the right to obtain from the data holder the correction of inaccurate personal data without undue justification delay

d) the right to obtain from the data holder the cancellation of personal data without unjustified delay, according to the reasons provided for by the GDPR in art. 17, among which, for example, in case they are no longer necessary for the purposes of the treatment or if this is assumed to be illegal;

e) the right of get from holder limitation of the treatment, in case according to art. 18 of the GDPR. The Party Concerned must be informed, in reasonable time, even when the limitation of treatment coming less, and therefore the limitation itself revoked;

f) the right to obtain communication from the holder of the recipients to whom the requests have been transmitted, adjustments or cancellations or limitations of the treatment carried out;

g) the right of receive in a structured format, readable from automatic devices, the personal data and the right to transmit such data to another data controller/holder without hindrance by the data controller who provided them (art. 20 of the GDPR) and the right to obtain direct transmission of personal data from one controller to another, if technically feasible.

For any further information please contact the Holder at [solari@solarigruppo.com](mailto:solari@solarigruppo.com) . In order to ensure that the rights mentioned above are exercised by Party Concerned and not by unauthorized third parties, the Data Holder may request to provide any additional information necessary for the purpose.

#### **How and when can the Party Concerned oppose the processing of personal data? (Art. 21 GDPR)**

For reasons relating to the particular situation of the Party Concerned, this may oppose at any time the processing of her/his personal data if it is based on legitimate interest or if it takes place for commercial promotion activities, sending the request to the Holder to [solari@solarigruppo.com](mailto:solari@solarigruppo.com) .

The interested part has the right to cancel personal data if there is no legitimate overriding reason for the Data Holder different from the request.

#### **To whom can the Party Concerned submit a complaint? (Article 15 GDPR)**

Without prejudice to any other administrative or judicial action, the Party Concerned may lodge a complaint with the competent supervisory authority on the Italian territory (Authority for the protection of personal data) or the one carrying out its duties and exercising its powers in the Member State where the GDPR violation took place.

## **SECTION IV**

### **Information automatically collected**

The website [www.solarigruppo.com](http://www.solarigruppo.com) uses a technology commonly called "cookies" to make your website easier and more intuitive. Cookies are small text files sent from the site to the user's terminal (usually to the browser), where they are stored before being re-transmitted to the site at the next visit by the same user. Cookies can provide information by which we can make the browsing experience easier and more efficient. In case specific not are However used "Cookies of profiling " but only the so-called Tech Cookies to anonymously monitor site usage statistics. For more information on all cookies used and on how to give consent to its installation, go to the page <http://www.solarigruppo.com/cookie.html>

### **Storage and updating of information**

We protect your information using technological and management security measures to reduce the risk of loss, incorrect use, unauthorized access, disclosure and alteration. Among the security systems used are the firewalls, the encryption of data, the physical access controls to our server controls for the authorization of access to information. Any paper copies of the same data will be kept in anonymous folders (only recognizable by mere alphanumeric codes) and stored in suitable protected environments.

We also inform you that, with regard to the data processed, the Party Concerned has the right at any time to exercise the rights recognized by the GDPR and, in particular, among others, to obtain a copy of the data processed, their updating, their correction or integration, their cancellation, their transformation in form anonymous or the block for the treatments in violation of law, of oppose for reasons legitimate to the treatment, or of oppose freely sending of material promotional or commercial.

The data controller is SOLARI PINO & VERO SNC, with headquarters based in Prato Carnico (UD), Zona Artigianale Chiampeas in the person of Pino Solari as legal representative.

To find out the updated list of data processors, to exercise the rights recognized by the GDPR, as well as for any demand or comment on this Policy Privacy is enough to send a mail to: [solari@solarigruppo.com](mailto:solari@solarigruppo.com) .

### **Withdrawal of consent**

If you decide not to give your consent to the processing of your personal information for the purposes of this document and according to the privacy policy, you could not log into to all our Services and may not be possible to provide you with all our Services and Customer Service offered to users, provided in accordance with the Privacy Policy and the Agreement for users.

### **Privacy protection procedures adopted by third parties**

This Privacy Notice for users refers only to the use and transmission of personal information we acquire from you. If you communicate information to others or if you are directed to a third-party website, the privacy policies and rules / policies of the subject in question will not be applied, so we invite you to evaluate the rules for the privacy and security of these subjects.

### **References on the legislation**

Code regarding the protection of personal data (from the website of the Italian Garante della Privacy): available at this address <http://www.garanteprivacy.it>