

Privacy Policy – web site www.filtomatic.com

The web-site (hereinafter "the Site") is the property of **FILTOMATIC FASTENERS S.r.l.** hereinafter "the Data Controller"), Data Controller. The security measures applicable to this Site have been defined and developed to ensure that the information provided by users (hereinafter "user", "users" or "you") is processed in compliance with the principles of lawfulness, correctness, transparency, limitation of the purposes and conservation, data minimization, accuracy, integrity and confidentiality, in compliance with current national and European regulations.

Pursuant to Regulation (EU) 2016/679 (hereinafter "Regulation"), this page describes the methods of processing the personal data of users who consult the website accessible electronically at the following address: www.filtomatic.com. This information (or "Privacy policy") is provided pursuant to art. 13 of the EU General Regulation 2016/679 on data protection (hereinafter "GDPR") and illustrates the methods of use, sharing, access, modification or deletion of the personal information provided by you and processed by **FILTOMATIC FASTENERS S.r.l.** The information is also inspired by Recommendation no. 2/2001 relating to minimum requirements for online data collection in the European Union, adopted on 17 May 2001 by the Article 29 Working Group.

This information does not concern other sites, pages or online services that can be reached via hypertext links that may be published on the sites but refer to resources external to the Owner's domain.

1. PERSONAL DATA SUBJECT TO THE PROCESSING

"Personal Data" means "any information relating to an identified or identifiable natural person in particular by reference to an identifier such as a name, an identification number, location data or an online identifier". The Personal Data collected by the Site are as follows:

- Personal and contact data

Specifically, they will concern the following categories of data: name, surname, tax code, e-mail address, telephone number. This type of data could be communicated to the Data Controller when filling out data collection forms on the website.

The optional, explicit and voluntary sending of messages to the contact addresses of **FILTOMATIC FASTENERS S.r.l.**, as well as the compilation and forwarding of the forms on the website www.filtomatic.com, involve the acquisition of the sender's contact data, necessary to respond, as well as all personal data included in the communications.

Specific information will be published on the pages of the website www.filtomatic.com set up for the provision of certain services.

- Browsing data

The computer systems and software procedures responsible for the correct functioning of the Site acquire, during their normal operation, some Personal Data whose transmission is implicit in browsing the websites. This information is not collected to be associated with identified interested parties; however, by their very nature they could, through processing and association with data held by third parties, allow users to be identified.

These include the IP addresses or names of the computers used by users who connect to the Site, the URI/URL (Uniform Resource Identifier/Locator) addresses 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 and other parameters relating to the operating system and the IT platform used by the user.

The above data is used for the sole purpose of obtaining anonymous statistical information on the use of the Site and to check its correct functioning. The data could be used to ascertain responsibility in case of hypothetical computer crimes against the Site.

- Cookies

All information regarding the Cookies used by **FILTOMATIC FASTENERS S.r.l.** through this Site are present in the appropriate Cookie Policy.

2. PURPOSE AND LEGAL BASIS OF DATA PROCESSING

The Personal Data you provide through the Site will be processed by the Company for the following purposes:

1. to fill out the form in the contact area of the website; legal basis of the processing: legitimate interest of the owner, contractual obligation;
2. purposes of statistical research/analysis on aggregate or anonymous data, without therefore the possibility of identifying the user, aimed at measuring the functioning of the Site and the related operational functions, including the resolution of any technical problem; legal basis of processing: legitimate interest of the owner;
3. purposes aimed at preventing or preventing fraudulent activities or improper use that could damage the FILTOMATIC FASTENERS S.r.l. site, or compromise the security of operations; legal basis of processing: legitimate interest of the owner;
4. purposes relating to the fulfillment of a legal obligation to which FILTOMATIC FASTENERS S.r.l. it is subject; legal basis of processing: legal obligation;
5. purposes necessary to ascertain, exercise or defend a right in court or whenever the jurisdictional authorities exercise their jurisdictional functions. legal basis of processing: legitimate interest;
6. for sending communications aimed at the promotion and/or direct sale of products or services similar to those already purchased/used by the User, without prejudice to the User's right to object at any time (so-called soft spam); legal basis of processing: legitimate interest;
7. to send commercial communications on products and services of the Site and/or of FILTOMATIC FASTENERS S.r.l., special offers, promotions relating to the products of FILTOMATIC FASTENERS S.r.l., by means of automated systems, e-mail (so-called newsletter), text messages, mms, fax, or similar, and/or via the postal service (so-called marketing purposes); legal basis of the processing: consent of the interested party.

The provision of your Personal Data is essential to be able to provide the services available through the Site. Failure to provide them may make it impossible to obtain what is requested. Apart from what is specified for navigation data, the user is free to provide the personal data contained in the information request forms to FILTOMATIC FASTENERS S.r.l. if necessary, whenever such data is requested, specific information will be provided and, where necessary, consent will be requested.

3. METHODS, PROCESSING LOGICS AND STORAGE TIMES

The processing of user information is carried out both in paper form and with the aid of electronic or automated means and is carried out by **FILTOMATIC FASTENERS S.r.l.** or by third parties that it can use to store, manage and transmit the data.

The processing will be carried out according to the logic of organization and processing of your Personal Data, also relating to logs originating from access and use of the services made available via the web, related to the purposes indicated above and, in any case, in such a way as to guarantee security and confidentiality. some data.

The Personal Data processed will be kept for the times established by the GDPR and by the legislation applicable at the time. Further information regarding the retention period of Personal Data and/or the criteria used to determine this period can be requested by writing to the Data Controller at the following address: www.filtomatic.com.

The data collected for marketing purposes, subject to the consent of the interested party, will remain until the consent of the interested party is revoked.

4. PLACE OF DATA PROCESSING

The processing connected to the web services of this site is based in Italy, and is managed by the service provider Promo.it Srl (Hosting provider) and is handled by technical staff of Volo S.r.l. Società Unipersonale and by other persons appointed by **FILTOMATIC FASTENERS S.r.l.**, during update and maintenance operations. No data deriving from the web service is disseminated. The personal data provided voluntarily by users who forward contact requests are used for the sole purpose of carrying out the service or provision requested, also possibly through external service providers.

5. RECIPIENTS

Your Personal Data may be shared, for the purposes specified in point 2, with:

1. persons authorized by the Company to process Personal Data who are committed to confidentiality or have an adequate legal obligation of confidentiality, subjects involved in the organization such as administrative staff, system administrators;
2. The data may also be processed, on behalf of the Data Controller, by external parties designated as data controllers pursuant to art. 28 of the GDPR, who are given adequate operational instructions. These subjects are essentially included in the following categories: companies that offer e-mail sending services, maintenance of websites and information systems, support in carrying out market studies and companies that carry out database management and maintenance services.

6. THIRD PARTIES TO WHOM THE INFORMATION MAY BE DISCLOSED

User information may also be communicated to third parties for the following reasons:

1. in order to fulfill the obligations established by laws, regulations, protocols and national or European legislation;
2. in order to implement regulations requested by public authorities;
3. in order to allow the Company to be defended in court, for example in the case of violations by network users;

The parties mentioned will process the information as independent data controllers/processors.

7. DATA TRANSFER ABROAD

The owner does not transfer personal data to non-EU countries. If necessary, the interested parties will be informed in advance, and guarantee measures will be adopted for the transfer towards the recipients, which depending on the case may be: verification of the existence of adequacy decisions for the recipient country by the Commission, signing of standard contractual clauses, verification of the adoption of any additional measures in implementation of the EDPB recommendation 01/2020. As an exception to these guarantees, for data processing (in reference to art. 49 of the GDPR), where applicable, the existence of a contract or pre-contractual measures in favor of the interested party or consent to the transfer is verified.

8. THE OWNER AND THOSE RESPONSIBLE FOR THE TREATMENT

The Data Controller of user data is **FILTOMATIC FASTENERS S.r.l.** with registered office in Via G. GALILEI 5, 20856 Correzzana (MB), on the staff of the legal representative, Stefano Perego.

The updated list of data processors and those authorized to process data is located at the registered office of the data controller. For any further information or clarification, the Company can be contacted at the following address: info@filtomatic.com

9. USER RIGHTS

We inform you that the articles. 15 et seq. of the GDPR grant users the exercise of specific rights towards the Data Controller. In particular, you will be able to:

- obtain confirmation of the existence and access to the Personal Data concerning you, even if not yet registered, and ask to know their origin, as well as the purposes, storage times, processing methods and the logic applied in case of processing carried out with automated tools;

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- revoke any consent given in relation to the processing of your Personal Data, without prejudice to the lawfulness of the processing carried out up to that point;
 - receive the Personal Data processed in a structured, commonly used and machine-readable format and, except where it is not technically feasible, transmit your data directly to another Data Controller;
 - obtain the cancellation, transformation into anonymous form or blocking of data whose retention is not necessary in relation to the purposes for which the data were collected and processed;
 - obtain the updating, rectification and integration of the data processed;
 - lodge a complaint with the supervisory authorities.

The exercise of these rights must not prejudice and/or infringe the rights and freedoms of others.

You can exercise these rights at any time by writing to the email address of the Data Controller: info@filtomatic.com

It is understood that, where requests are submitted by electronic means, the information will be provided free of charge and in a commonly used electronic format.

According to the provisions of the art. 15, 3) of the GDPR, if the user's requests are manifestly unfounded or excessive, in particular due to their repetitive nature, the Company may alternatively:

- charge a reasonable fee taking into account the administrative costs incurred in providing the information or communication or taking the requested action;
- refuse to comply with the request.

In both circumstances **FILTOMATIC FASTENERS S.r.l.** provides adequate justification to the user.

10. CHANGES TO THE PRIVACY POLICY

FILTOMATIC FASTENERS S.r.l. reserves the right to modify or simply update its content, in part or completely, also due to changes in applicable legislation.

We therefore recommend that you regularly check this section to become aware of the most recent and updated version of the Privacy policy so that you are always updated on the data collected and the use that the Company makes of it.

In the event that **FILTOMATIC FASTENERS S.r.l.** makes changes deemed important, users will be informed via the Site.