

PRIVACY POLICY
WWW.FRASCOLD.IT

INFORMATION ON THE SUBJECT OF THE PROTECTION OF PERSONAL DATA PURSUANT TO ARTICLES 13 AND 14 OF REGULATION (EU) 2016/679)

FRASCOLD S.p.A., with registered office in Via Barbara Melzi 105- Rescaldina (Mi), Italian VAT/Tax Code no. 04629510159 – Tel. +39 0331742201 - e- mail frascold@frascold.it, as **Data Controller** (hereinafter the “**Company**” or the “**Controller**”), provides below the information common to the processing of personal data carried out in the context of its institutional website, accessible by electronic means from the address: www.frascold.it (hereinafter, the “**Website**”).

In this regard, it should be noted that the policy is provided only for the Website and not for other websites that may be viewed through hyperlinks or widgets (e.g. social networks) published on the Website, but refer to resources outside the domain of the Controller or the processing that may result from the voluntary sending of messages.

1. CATEGORIES OF DATA SUBJECTS AND PERSONAL DATA PROCESSED

The Controller processes the personal data of natural persons (identified or identifiable) who visit and consult the Website or who voluntarily carry out interaction with the Controller (hereinafter, the “**Users**”).

The personal data processed are:

- a) *Browsing data*: the IT systems and the software procedures appointed for the functioning of the Website acquire, during the course of normal activity, certain personal data, the **transmission of which is implicit** when using Internet communication protocols. This category of data includes: IP addresses or domain names of the computers and terminals used by the users, the addresses in URI/URL (Uniform Resource Identifier/Locator) 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 reply, the numerical code indicating the status of the response from the server (successful, error, *etc.*) and other parameters regarding the operating system and computer environment of the users;
- b) *Data communicated*: the optional, explicit and voluntary sending of messages by filling out and forwarding of forms on the Website and/or to the Company's contact addresses or to the institutional profiles/pages on social media (where this possibility is provided) involves the acquisition of the User's contact data necessary to answer, as well as all the additional and any personal data included in the registration form or in the communications. Specific policies will be published on the pages of the Website containing the form or designed to provide certain services.
- c) *Cookies and other tracking systems*: for more information on the type of cookies used, their management of use and purposes, **consult the cookie policy on the Website <https://www.frascold.it/cookies-policy>**.

(hereinafter, all together, the “**Personal Data**”).

2. PURPOSE FOR PROCESSING AND LEGAL BASIS:

The Data Controller processes the Personal Data collected in the context of the Website for the purposes and by virtue of the legal basis indicated in the following table:

	<u>What are the PURPOSES of the processing?</u>	<u>What are the LEGAL BASIS for the processing?</u>
1)	Fulfilment of a legal obligation related to civil, tax and administrative provisions, EC legislation, rules, codes or procedures approved by Authorities and other competent Institutions, as well as to respond to requests by the competent administrative or judicial authority and, more generally, by public entities in compliance with legal requirements.	Fulfilment of a legal obligation to which the Controller is subject.
2)	To assert and defend their rights, including through out-of-court initiatives and also through third parties, as well as to prevent and detect fraudulent activities or the abuse of the Website (for potentially criminal purposes, such as for identity theft, computer crimes, <i>etc.</i>).	Pursuit of the legitimate interest of the Controller.
3)	To enable Users to access the Website and navigate in an optimum way and manage the requests received through the Website.	Execution of pre-contractual measures adopted upon the User's request .
4)	Limited to users' browsing data <i>sub par. 1 point a)</i> , for security purposes of the Owner's systems and to obtain statistical information on the use of the Website (such as the most frequently visited pages of the Site, the average time spent on each page), as well as to control and administer the operation of the Website and improve the services provided.	Pursuit of the legitimate interest of the Controller.
5)	In order to manage the subscription to the Company's newsletter and therefore to send informative, promotional and updating communications regarding the Company's activities, services and products (including the transmission of illustrative material) and to improve the service rendered to its customers or to those interested in the solutions offered by the Group, activities such as satisfaction surveys or market research or statistics whose precise content cannot be predetermined will also be carried out.	Specific consent of the User (expressed when voluntarily filling in the form/box requesting the e-mail address for subscription to the newsletter service), which can be revoked at any time as indicated in par. 8 of this privacy policy.
6)	To manage the contacts section of the website and,	Execution of pre-contractual measures

therefore, to respond to any user requests received by filling in the appropriate form or by sending communications to the Controller's e-mail address	adopted upon the User's request.
--	----------------------------------

3. OBLIGATION TO PROVIDE THE REQUESTED DATA AND CONSEQUENCES OF FAILURE TO DO SO

With the exception of that specified for navigation data (and, in the specific policy, for the management of cookies), the user is free to provide his/her personal data (through forms - in the pages that allow it - or with other modalities to the contacts of the Controller) to send information requests or to receive commercial communications.

It is understood that failure to provide them, even in part, may prevent the Controller from carrying out what has been requested by the User and communication and marketing activities, as well as the fulfilment of any related obligations.

4. PROCESSING METHODS

The Personal Data will be processed using both manual and automated IT tools exclusively by authorised and specifically instructed parties.

5. RECIPIENTS/CATEGORIES OF RECIPIENTS OF THE PERSONAL DATA

For the purposes indicated in *par. 2*:

- ✓ personal Data of Users can be communicated:
 - to the Controller's authorised processors (employees or collaborators);
 - to third party service providers to the Controller (including IT service providers, hosting providers,, web editors, as well as companies or as subjects carrying out legal and insurance services) who will act, where appropriate, as data processors;
 - to third-party companies and professionals appointed to assert the rights, interests and claims of the Controller arising from the relationship with the Users;
 - to State Administrations, Judicial or Administrative Authorities, Public and Private Entities, also following inspections and audits;
 - to persons who can access the data by virtue of legal provisions or secondary or EC legislation.

Only the category of recipients is indicated, since they are constantly updated. In order to obtain an updated list of recipients, Users may contact the Controller directly, by writing to the contact details indicated in par. 9 of this privacy policy.

6. STORAGE PERIOD OF PERSONAL DATA

The Personal Data will be stored by the Controller for the time strictly necessary for the purpose for which they were collected; specifically, the Controller will keep:

- Users' browsing data (indicated in par. 1, lett. a) for the duration of the navigation session and in any case not more than seven days, except in the case of malfunctions in the systems, in which case they will be kept until the problem is resolved;
- the data communicated by the Users (indicated in par. 1, lett. b):
 - i)* with regard to the personal data required to receive the newsletter, until such time as the User revokes his consent;

- ii)* in other cases, for the time necessary to process the relevant request;
- Personal Data whose processing is necessary in relation to legal obligations, for the duration of the law;

and in any case, for the purposes indicated in par. 2, no. 2, for a maximum period equal to the limitation period of the relevant actions increased by a prudential period of six months, in order to guarantee the right of defence of the Company with reference to future possible disputes in judicial or administrative proceedings.

In all cases, once the respective terms have expired, all Personal Data will be deleted or made anonymous. It is understood that the terms indicated may be extended in cases where the retention for a further period is requested for any disputes, requests from the competent authorities or pursuant to the applicable legislation.

7. TRANSFER OF PERSONAL DATA TO ANOTHER COUNTRY OR INTERNATIONAL ORGANISATION

Within the scope of the above purposes and in particular in order to evaluate your profile, it is possible that your data will be transferred to countries belonging to the EU.

8. RIGHTS

The Users, if the circumstances exist, may exercise the following rights against the Controller:

- **Right of access:** allows Users to obtain confirmation from the Controller as to whether or not Personal Data concerning them are being processed and, if so, to obtain access to their Personal Data;
- **Right of rectification:** allows Users to obtain the rectification/completion of inaccurate/incomplete Personal Data;
- **Right to erasure:** allows Users to obtain, in the cases provided for by law, the erasure of their personal data;
- **Right to restriction of processing:** allows Users to obtain, in the cases provided for by art. 18, subsection 1 of the GDPR, the restriction (i.e. the marking of the personal data stored with the aim of restricting its processing) of the processing of the data;
- **Data portability right:** allows Users - in the event that the processing is carried out by automated means on the legal basis of the contract or consent - to receive in a structured format, commonly used and machine readable, limited to the data provided to the Controller, the personal data that concern the Controller and similarly the right to transmit such data to another data controller.

Moreover, Users have the right:

- to **object** to the processing of their Personal Data for the purposes indicated in paragraph 2 *sub* no. 2 and 4 for reasons, to be explained, related to their own particular situation;
- to **revoke, at any time, the consent** to receive the Controller's newsletter (see par. 2 *sub* n. 5), cancelling your subscription to the service by means of the appropriate link indicated at the bottom of each newsletter
- as well as, if they consider that the processing of the Personal Data referred to them takes place in breach of the provisions of the GDPR, to **lodge a complaint** with the national supervisory authority of the member state of the European Union in which the Data Subject

has his/her habitual residence or place of work or where the alleged breach of his/her right has occurred (in the event that this State is Italy, the entity which he/she may contact is the Data Protection Authority) **or to take legal actions in the courts having jurisdiction** (art. 79 of the GDPR).

9. CONTACTS

To exercise all rights, the data subject may submit a specific request by contacting the Controller as follows:

- by mail c/o **FRASCOLD S.p.A.** to the address **Via Barbara Melzi 105- Rescaldina (Mi)**;
- by sending an e-mail to the ordinary **e-mail frascold@frascold.it**

10. AMENDMENTS

This privacy policy became effective on 12/15/2021

The Company reserves the right to amend part or all of this policy or update its content, for example as a result of changes in the applicable law. Therefore, the Company invites the User to regularly consult the policy in order to be aware of the latest updated version in order to be always informed about the way of collection and use of the Personal Data.