

## PRIVACY POLICY OF ARCONVERT S.P.A.

This website collects certain personal data from its users. The information is provided by virtue of Article 13 of Regulation (EU) 2016/679.

### Data Controller:

Arconvert S.p.A.

Via Linfano 12, Arco (TN) - Italy

**The controller's email address: [privacy@arconvert.com](mailto:privacy@arconvert.com)**

### Type of data collected

The personal data collected by this website, either independently or through third parties, include the following: first name, surname, email, cookies and usage data.

Full details of each type of data collected are provided in the relevant section of this privacy policy or by means of specific informative texts displayed before the data are collected.

The personal data may be freely provided by the user or, in the case of usage data, automatically collected while using this website.

Unless otherwise specified, all data required by this website are mandatory. If the user refuses to provide them, it may be impossible for this website to provide the service. In cases when this website indicates certain data are optional, users are free to abstain from disclosing such data, with no consequences affecting the availability of the service or its operability.

Users who have any doubts about which data is mandatory are advised to contact the controller.

The possible use of cookies - or other tracking tools – by this website or third service providers using this website, unless otherwise specified, is intended for rendering the service the user requests, apart from the additional purposes described in this document or in the Cookie Policy.

Users undertake responsibility for any third parties' personal data obtained, published or shared by means of this website and guarantee they hold the rights to disclose or publish them, holding the controller harmless for any liability that could be claimed by such third parties.

## Methods, legal basis and place for processing the data collected

### Processing method

The controller will adopt the suitable security measures in order to prevent unauthorised access, disclosure, modification or destruction of the personal data.

The processing is carried out by means of computer and/or electronic tools, with organisational and digital methods strictly related to the specified purpose. Apart from the data controller, in some cases, other parties involved in the organisation of this website (administrative, commercial, marketing, legal staff and system administrators) or external parties (such as third technical service providers, couriers, hosting providers, information society, communication agencies), if necessary, as well as data processors acting on behalf of the controller may be allowed access to the data. The updated list of processors may always be requested from the controller.



### **Legal basis for processing**

The controller will process the personal data related to the users when any of the following conditions are met:

- The user has granted his/her consent for one or more specific purposes;<sup>1</sup>
- The processing is necessary to execute an agreement with the user and/or to execute pre-contractual clauses;
- The processing is necessary to fulfil a legal obligation to which the controller is subject;
- The processing is necessary to perform a task carried out in the public interest or to exercise the public powers granted to the controller;
- The processing is necessary in the legitimate interest of the controller or third parties.

However, it is always possible to request the controller to clarify the specific legal basis for any data processed and, in particular, to specify whether the processing is based on the law, stipulated in an agreement or necessary to enter into an agreement.

### **Place**

The data are processed at the controller's operational headquarters and in any other place where the parties involved in the processing are located. For further information, please contact the controller. The users' personal data may be transferred to a country other than the one where they are located. For further information about the place of processing, users can refer to the section related to details about personal data processing.

The user is entitled to obtain information about the legal basis for the transfer of data outside of the European Union, along with the security measures adopted by the controller to protect such data.

If any of the aforementioned transfers takes place, the user may refer to the relevant section in this document or request information from the controller by contacting the latter at the address provided above.

### **Storage period**

The data are processed and stored for the time required for the purpose for which they are collected.

Therefore:

- The personal data collected for the purpose of executing an agreement between the controller and the user will be stored until the execution of such agreement has been completed.
- The personal data collected for the purpose of the controller's legitimate interest will be stored until such interest is no longer applicable. The user can obtain further information about the legitimate interest sought by the controller in the relevant sections of this document or by contacting the controller.
- When the processing is based on the user's consent being granted, the controller may store the personal data for a longer time until such consent has been revoked. In addition, the controller may be legally required to store the personal data for a longer period of time or due to an order issued by the authorities.

At the end of the storage period, the personal data will be deleted. Therefore, when such period has expired, the right to access, rectify, cancel and the right to portability of the data may no longer be exercised.

### **Purposes for processing the data collected**

The user's data are collected to allow the controller to provide its services, along with the following purposes: To contact the user, statistics, interaction with social networks and external platforms, to manage agreements and to send messages, manage the page invites, interaction with data collection platforms and other third parties and the hosting platforms and services and to manage CVs submitted.

To obtain more detailed information about the purposes of the processing and the personal data specifically relevant for each purpose, the users can refer to the relevant sections in this document.

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<sup>1</sup> In some jurisdictions, the controller may be authorised to process the personal data without having obtained the user's consent or for any other legal grounds specified below, until the user opts-out of such processing. However, this is not applicable if the processing of personal data is governed by European data protection laws.



Personal data are collected for the following purposes and for using the following services:

- **Contacting the user**
  - **Contact form**
  - By filling in the contact form with their data, users consent to the use of such data to reply to requests for information, quotes or any other information specified in the heading of the form.
  - The personal data collected: the data required in the fields of the request form.
  - This kind of service allows a database to be managed with the email contact details, telephone numbers or any other kind of contact used to communicate with users. These services also allow data to be collected about the date and time users view the messages and their interaction with us, such as information about the number of clicks on links in messages.
- **Requesting samples and catalogues**
  - This kind of service allows requests to be made for samples and catalogues by filling out a form and signing up to a data base to deal with the request.
  - The personal data collected are: first name, surname, company position, telephone number, email address, profile photo.
- **Interaction with social networks and external platforms**
  - This kind of service allows interaction with social networks or with other external platforms, directly from the page of this website. The interactions and information obtained from this website are, in all cases, subject to the user's privacy settings for each social network. If a service is installed for interaction with social networks, traffic data could be collected from the page where it is installed, even if the user does not use this service.

The social networks identified are: Facebook, Twitter, Instagram, Linked in, Spotify, YouTube, Flickr.

## Users' Rights

Users can exercise certain rights related to the data processed by the controller. The articles of reference are 15, 16, 17, 18 and 20 of Regulation (EU) 2016/679.

In particular, users are entitled to:

1. **revoke their consent at any time.** Users can revoke their consent to their personal data being processed previously granted.
2. **oppose processing of their data.** Users can oppose their data being processed when it is carried out on a legal basis other than their consent. Further details about their right to opposition are specified in the section below.
3. **access to their data.** Users are entitled to obtain information about their data processed by the controller regarding certain aspects of the processing and to receive a copy of the data processed.
4. **verify and request rectification.** Users can check their data are correct and request it to be updated or corrected.
5. **obtain restriction of processing.** When certain conditions are met, users can request restriction of processing of their data. In such case, the controller cannot process the data for any purpose other than for the storage thereof.
6. **obtain cancelation or removal of their personal data.** When certain conditions are met, users may request full cancelation of their data by the controller (the right to be forgotten).
7. **receive their data or transfer them to another controller.** Users are entitled to receive their own data in a commonly used structured format that is legible by an automatic device and, when technically feasible, the unhindered transfer of such data to another controller. This provision is applicable when the data are processed with automatic tools and the processing is based on the user's consent, an agreement in which the user is a party or on contractual clauses related thereto.
8. **submitting a claim.** Users can submit a claim to the competent data protection supervisory authorities or file a legal action.

### Details of the right to opposition

When the personal data are processed in the public interest, exercising the public powers granted to the controller or in the controller's legitimate interest, users are entitled to oppose the processing based on reasons related to their specific situation.



Users are informed that, if their data are processed for direct marketing purposes, the processing thereof may be opposed without needing to provide any reason. In order to find out whether or not the controller is processing the data for direct marketing purposes, users can refer to the relevant sections in this document.

#### **How to exercise the rights**

In order to exercise the users' rights, users can send a request to the controller's contact details specified in this document. The requests will be submitted free of charge and dealt with by the controller as soon as possible and, in all cases, within a term of one month.

### **Further information about the processing**

#### **Defence in legal proceedings**

The user's personal data may be used by the controller in legal proceedings or in the preparatory stages to possibly to file a claim for misuse by the user of this website or the related services. The user hereby states that he/she is aware of the fact that the controller may also be required to disclose the data by virtue of an order issued by the public authorities.

#### **Specific disclosure**

At the user's request, apart from the information contained in this privacy policy, this website may provide the user with additional and contextual information about specific services or the collection and processing of personal data.

#### **System and maintenance log**

This website and the possible third party services used thereby may collect system logs for operational and maintenance purposes, in other words files that record interactions and that could also contain personal data, such as the user's IP address.

#### **Information not contained in this policy**

Further information related to the processing of personal data can be requested at any time from the controller by using the contact details thereof.

#### **Amendments to this privacy policy**

The controller reserves the right to make amendments to this privacy policy at any time by informing the users on this page and, if possible, on this website and, whenever technically and legally feasible, by sending notification to the users through the contact details stored by the controller. Please regularly check this page, referring to the date of the last amendment specified at the bottom of the page.

The controller will obtain the user's consent again, if necessary, for any amendments affecting processing when the legal reason is based on the user's consent.