

**Subject: information notice issued by Progettare Zerosei S.r.l. to clients and suppliers,
pursuant to article 13 of Regulation (EC) 2016/679**

This information notice is drafted and issued pursuant to article 13 of Regulation (EU) 2016/679 (hereinafter, simply the Regulation) by which new significant regulatory elements have been introduced.

This information notice updates and supersedes all previously issued versions.

The foregoing being said, it is hereby specified as follows:

- 1) as a consequence of the establishment and in the course of performance of the business relationship with our clients, our company shall collect and process the clients' personal data;
- 2) for the sake of clarity, please find below the definitions laid down in the EU Regulation above.

Personal data: any information relating to an identified or identifiable natural person ("data subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

Processing: any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Pursuant to article 13 of Regulation (EU) 2016/679,

we hereby inform you

that your personal data shall be collected and processed by our company in conformity with the principles below.

- a) **Purpose(s):** data shall be processed for the purpose of correctly fulfilling accounting, tax, commercial, technical requirements and all the company operations generally concerning the business relationship in place.
- b) **Advertising purpose:** data may also be used, after receiving your specific and explicit consent, for the sending of advertising material/communications by mail, email, fax, sms and similar media. Although you have given your consent, you are in any case entitled to object, at any time and free of charge, to processing of your personal data for the purpose explained herein.
- c) **Processing method(s):** data shall be processed using both paper and electronic/computer/remote tools/supports fully in compliance with the laws and in accordance with the principles of lawfulness and fairness, and in such way that your privacy is safeguarded.
- d) **Optional provision:** the provision of data is optional and not mandatory.
- e) **Consequences in the event of refusal:** should you refuse to provide your personal data, or fully object to its processing, any business or other relationship with our company whatsoever may be discontinued; refusal to use your personal data for the purpose of sending advertising material/communications shall, on the other hand, have no impact on our existing or future relationships.
- f) **Entities or categories of entities (recipients) to whom data may be communicated or disclosed:** data may be disclosed to third parties for the exclusive purpose of fulfilling either statutory or contractual obligations. Data shall in no way be disseminated.
- g) **Persons authorised to process personal data:** data shall be processed exclusively by the company's persons working in the administration and sales areas, as duly authorised.
- h) **Automated decision-making processes (e.g. profiling):** automated decision-making processes are not managed at all.

- i) **Data subject's rights:** as data subject, you shall enjoy all the rights provided in the Regulation (EU) such as the right of access to and rectification of your personal data, the right to restriction to processing, the right to object to processing, as well as the right to personal data portability. You also have a right to lodge a claim with the Supervisory Authority.
- j) **Data transfer to third countries:** any transfer of personal data to a third country outside the European Union or to an international organization shall take place on the basis of an adequacy decision of the European Commission or, with regard to transfers under articles 46, 47 or 49, second paragraph, of the Regulation (EU), on the basis of proper and appropriate guarantees.
- k) **Period for which the personal data will be stored:** data shall be stored for as long as strictly required to address the requests of the data subject or for as long as required by the existing regulations or contractual clauses.
- l) **Controller:** the controller is Progettare Zerosei S.r.l., having its place of business in Reggio Emilia (Italy), Via A. Gramsci 54/V, as represented by its *pro tempore* legal representative.

We are ready to provide you with additional information and guidelines to this information notice, either verbally or in writing, in order to clear any and all doubts you may have concerning "Privacy/Data Protection" and in compliance with the evolving statutory requirements.

Reggio Emilia, 23/05/2018

The Controller
Progettare Zerosei S.r.l.

Subject: website information notice

This page illustrates the procedures for website management relating to the processing of personal data of the website users.

Pursuant to article 13 of Regulation (EU) 2016/679, this information notice is given to all persons who use the *web* services provided by the company.

This information notice only applies to this website, meaning it does not apply to other *websites* which the users may consult following the *link*.

The information notice identifies some minimum requirements for the collection of personal data *on-line*, and, more specifically, the procedures, times and nature of the information that the Controllers shall provide the users whenever they log into the *web* pages, regardless of their purposes.

DATA CONTROLLER

After consultation of this website, data concerning either identified or identifiable persons may be processed.

The data controller is Progettare Zerosei S.r.l., as represented by its legal *pro tempore* representative.

LOCATION OF DATA PROCESSING

Processing of data in connection with the *web* services provided in this website takes place at the registered office of the organisation and it is performed by technical staff specifically appointed for this purpose or by staff in charge of occasional maintenance.

Data originating from the *web* service are neither disclosed nor disseminated.

Any personal data provided by users when they file requests for information materials (e.g. newsletters, CD-ROMs, catalogues, price lists, replies to inquiries, misc. documents, etc.) are exclusively used to fulfil the requested service or demand.

TYPES OF PROCESSED DATA*Navigation data*

During normal operation, the information systems and the *software* procedures used to operate this *website* entail the acquisition of some personal data whose transmission is implied in the use of internet communication protocols.

Although such data are not collected for matching with identified individuals, they may, by their own nature, allow for the identification of users through processing and matching with third-party data.

This category of data includes the IP addresses or domain names of computers utilised by users who connect to the *website*, the *URI (Uniform Resource Identifier)* addresses of the resources requested, the time of the request, the method used in submitting the request to the server, the size of the file received in reply of the request, the numerical code specifying the status of the *server* reply (successful, error, etc.), and other parameters relating to the operating system and the user's computer environment.

Such data are used for the sole purpose of collecting anonymous statistical information on website use and for monitoring its correct operation. So, they are deleted immediately after processing. Data may be used to establish liability in the event of alleged cyber crimes to the detriment of the website. With the exception of this case, data on *website* contacts do not persist for longer than seven days.

Data deliberately provided by the user

Optional, explicit and deliberate sending of emails to the addresses specified in this website results in the acquisition of the sender address, which is necessary to reply to requests, and of any other personal details given in the mail.

Specific summary information shall progressively be published or displayed on the pages of the website that are provided for special on-demand services.

USE OF COOKIES

With reference to the use of cookies, please refer to the additional and dedicated "Detailed Information Notice" published on this website and drafted in compliance with the Order dated 8 May 2014, issued by the Authority for the Protection of Personal Data, which supplements and completes this document.

OPTIONAL PROVISION OF PERSONAL DATA

Excluding the specifications concerning navigation data, the user is free to provide personal data or not. However, failure to provide such data may result in the failure to receive what the user requests.

METHOD(S) OF DATA PROCESSING

Personal data are processed with automated tools for as long as strictly required to fulfil the purposes for which they were collected.

Specific safety measures are implemented to prevent the loss of data, unlawful or unintended uses, and unauthorised access.

DATA TRANSFER TO THIRD COUNTRIES

Any transfer of personal data to a third country outside the European Union or to an international organization shall take place on the basis of an adequacy decision of the European Commission or, with regard to transfers under articles 46, 47 or 49, second paragraph, of the Regulation (EU), on the basis of proper and appropriate guarantees.

DATA SUBJECTS' RIGHTS

Data subjects to whom personal data refer shall, at any time, have the right of access to and rectification of their personal data, the right of erasure, the right to restriction to processing, the right to object to processing, as well as the right to personal data portability. They shall also have the right to lodge a complaint with the supervisory Authority.

Requests shall be addressed to the Data Controller.

This information notice is the "*Privacy Policy*" of this website, and it shall be subjected to updates.