

Privacy policy for the use of the web site

www.cerin.it

Cerin S.p.A., with registered office in Via Enrico Fermi n. 15 - 37010 Affi (VR - Italy), VAT no. 00244240230 as data controller of personal data processing (here-in-after “**Data Controller**”), informs you pursuant to the EU Regulation 2016/679 (“**GDPR**”) and the national legislation on data protection currently in force that your data shall be processed according to the following modalities and for the following purposes:

1. Scope of the processing

The Data Controller processes the identification and non-sensitive personal data (in particular, name, surname, email address, telephone number, IP address, etc. – here-in-after “**Data**” or “**Personal Data**”) you provided upon browsing on the web of the Data Controller www.cerin.it (here-in-after “**Site**”) and/or in case of contact request forwarded to the Data Controller.

2. Purposes and legal basis of the processing

Your Data shall be processed for the following purposes:

A. without your prior consent, for the following Service Purposes:

- A.1) the performance of contractual and/or pre-contractual obligations and commitments:
- management of your request of contact;
 - management of your browsing on the Site;
- A.2) the fulfillment by the Data Controller of legal obligations:
- compliance to the obligations provided by laws, regulations or imposed by the Authorities;
- A.3) the pursuing of a lawful interest by the Data Controller, in particular:
- management and maintenance of the Site;
 - prevention and identification of fraudulent activities or harmful damages for the Site;
 - exercise of the Data Controller’s rights, such as the right of defence in Court.

B. only by your prior consent, for marketing purposes:

- sending by the Data Controller of its communications and materials, bearing a promotional and/or advertisement content, also by means of automated emailing systems and/or faxes and/or sms and/or mms and/or other messaging and/or newsletter and/or multimedia services.

Moreover, if you are already registered, the Data Controller may send to you to the email address you provided, even without your prior consent, advertisement communications relating the services of the Data Controller similar to the ones you have already availed of (so-called “Soft Spam”). Any sent email shall allow you, by clicking on the specific link, to refuse further mailing.

3. Processing modalities

The processing of your Personal Data is made – electronically – by means of operations of collection, registration, organization, storage, consulting, processing, modification, selection, extraction, comparison, use, interconnection, access and communication, blocking, erasure and destruction of the Data.

4. Storage of Data

The Data Controller processes the Data for the time necessary to fulfill the above purposes and anyway for a maximum period of 10 years from the collection for Service Purposes; for a maximum period of 2 years from the collection for Marketing Purposes.

5. Access to Data

Your Data may be accessible for the above purposes to:

- employees and/or collaborators of the Data Controller, in their quality of persons in charge of the data processing and/or internal data processors and/or system administrators;
- third party companies or other subjects (e.g., IT service providers, suppliers, financing institutions, professionals, etc.) performing activities in outsourcing for the Data Controller, in their quality of external data processors.

6. Communication of Data

Your Data may be communicated, even without your prior consent, for the above purposes, to controlling bodies, police authorities or judiciary that shall process them, upon their express request, as autonomous data controllers for institutional purposes and/or by law during the course of investigations and controls. Your Data may be also communicated to third parties (e.g., partners, professionals, agents, etc.) in their quality of autonomous data controllers for the performance of activities instrumental to the above purposes.

7. Transfer of Data

Your Data shall not be disseminated but they may be transferred for the above purposes to extra EU Countries, such as Liechtenstein, for example. In order to ensure a proper level of protection of the Personal Data, the transfer shall occur on the basis of an adequacy decision approved by the EU Commission or on the basis of the implementation by the Data Controller of the Standard Contractual Clauses issued by the EU Commission.

8. Provision of Data

The provision of Data is mandatory for the Service Purposes. In case you decided not to provide your Data, the Data Controller shall not be able to follow-up your requests relating the Service Purposes. The provision of Data for the further Marketing Purposes is discretionary for you and the lacking such provision does not prevent you from availing of the services of the Data Controller. In case you decided not to provide the Data, you will not be able to receive the initiatives of the Data Controller.

9. Data subject's rights

The Data Controller hereby informs you that as data subject, and if no limitations provide by law occur, you are entitled to:

- obtain confirmation over the existence or inexistence of Personal Data relating you, even if not yet registered, and their communication in a comprehensible way;
- obtain the indication and, if necessary, the copy of the: a) source and category of the Personal Data; b) logic applied in case the processing is performed by means of electronic instruments; c) purposes and modalities of the processing; d) identification references of the Data Controller and the Data Processors; e) subjects or categories of subjects to whom Personal Data may be communicated or who may come to know, in particular if recipients are extra-EU countries or international

organizations; e) period for which the Personal Data will be stored, or if that is not possible, the criteria used to determine that period; f) existence of an automated decision-making process and, in this case, information about the logic involved, the significance and consequences for the data subject; g) existence of adequate safeguards in case of transfer of Personal Data to an extra-EU country or international organization;

- obtain, without undue delay, the update, the rectification or, whether you are interested, the integration of incomplete Data;
- exercise the right of revocation of your consent any time, easily, with no impediments, by using, if possible, the same means used to provide your consent;
- obtain the cancellation, the transformation into anonymous form or blocking of the Data: a) processed in breach of the law; b) no longer necessary in relation to the purposes for which the Data have been collected or subsequently processed; c) if you withdraw consent on which the processing is based and there is no other legal ground for the processing; d) if you object to the processing and there are no overriding legitimate grounds for the processing; e) in compliance with a legal obligation; f) referred to children. The Data Controller may refuse to erase them when the processing is necessary: a) to exercise the right of freedom of expression and information; b) in compliance with a legal obligation, for the performance of a task carried out in the public interest or in the exercise of official authority; c) for reasons of public interest; d) to achieve purposes in the public interest, scientific or historical research purposes or statistical purposes; e) for making legal claims;
- obtain the restriction of processing when: a) the accuracy of the Personal Data is contested; b) the processing is unlawful and the data subject opposes the erasure of the Personal Data; c) Data are required by you for your exercising of legal claims; d) pending verification whether the legitimate grounds of the controller override those of the data subject;
- receive the Personal Data concerning you in a structured, commonly used and machine-readable format and transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where the processing is carried out by automated means;
- oppose, in whole or in part: a) for lawful grounds to the processing of Personal Data regarding you, even if pertaining the purpose of Data collection; b) to the processing of Personal Data that relates to you for the purpose of sending advertising material or of direct sale or for market researches or commercial communication, by means of automated call systems without the intervention of an operator, e-mail and/or traditional marketing methods by telephone and/or paper mail.
- submit a data protection complaint to the competent supervisory authority.

In the above mentioned cases, whether necessary, the Data Controller shall communicate any exercise of your rights to each third party to whom the Personal Data are communicated, except for specific cases (for example, if this proves impossible or involves disproportionate effort).

10. Modalities of exercise of rights

You shall be able to exercise your rights anytime:

- By sending a registered letter with return receipt to the address of the Data Controller;
Via Enrico Fermi 15 37010 AFFI (Verona) Italy
- By sending an email to privacy@cerin.it
- By calling the following phone number +39 045 7200 844

11. Minors

Minors of 16 years shall be able to use the Site only with the assistance of one parent or of the subject exercising the parental responsibility.

12. Data Controller, Data Processor, Data Protection Officer

The Data Controller is:

- **Cerin S.p.A.**, with registered office in Via Enrico Fermi n. 15 - 37010 Affi (VR - Italy), VAT no. 00244240230

The data processor is:

- Ivan Cuscov – ivan_cuscov@cerin.it

The updated list of the data processors is kept at the office of the Data Controller in Via Enrico Fermi n. 15 - 37010 Affi (VR - Italy).

Affi, 30/10/2018

Cerin S.p.A.