

## PRIVACY POLICY

(EU Regulation no. 2016/679 - "GDPR")

Welcome to the website [www.tecnovarecycling.it](http://www.tecnovarecycling.it) ("**Website**").

With this Privacy Policy, Tecnova S.r.l. Società Unipersonale ("**Tecnova**") provides the user with information relating to the processing of personal data, automatically collected by accessing and browsing the Website.

Browsing the Website is free and requires no registration.

The provision of personal data is provided only in the sections "Contact and support" and "Newsletter," for which special notices have been prepared.

The Website may contain hyperlinks to websites, pages or online services of third parties. By clicking on these links, the user will be able to access multimedia contents which, being the exclusive property of the aforementioned subjects, are beyond the control of Tecnova and are not subject in any way to what is indicated in this Privacy and Cookie Policy. Therefore, Tecnova invites user to pay attention when subscribing to services offered by third parties and to carefully read the information on the processing of data provided by them, in relation to which Tecnova cannot carry out any control, nor be held liable.

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### **1. Data Controller**

Tecnova s.r.l. Società Unipersonale, (VAT no. 00985640036), with registered office in Via Verbano n. 56/A, Oleggio (NO) - Italy, certified e-mail address [tecnova.srl@legalmail.it](mailto:tecnova.srl@legalmail.it), e-mail address [privacy@tecnovarecycling.it](mailto:privacy@tecnovarecycling.it), phone number 0321 91700, is data controller.

### **2. Personal Data**

Personal data means any information that concerns the user and is referable to him. Specifically, the processing will concern:

#### **Navigation Data**

When accessing and browsing the Website, Tecnova generally collects browsing data using cookies or other tracking technologies. The computer systems and software procedures used to operate the Website acquire, in the course of their normal operation and automatically, some personal navigation data, the transmission of which is implicit in the use of Internet communication protocols.

These are data relating to telematic traffic which, by their nature, are not collected to be immediately associated with identified users, but which could allow identification through processing or association with data held by third parties. This category of data includes, for example, connection data, IP addresses, domain names, the addresses in URI (Uniform Resource Identifier) notation, the time of the request, the method used in forwarding the request to the server, the size

of the file obtained in response, the numeric code indicating the status of the response from the server (successful, error, etc. ) the country of origin, the characteristics of the browser and operating system used by the visitor, the various temporal connotations of the visit (e.g. the length of time spent on each page) and the details of the itinerary followed within the Website, with particular reference to the sequence of pages consulted, the parameters relating to the user's operating system and computer environment.

This Data allows you to access the Website and use the services provided therein and can be used - anonymously and in aggregate form - to obtain information about visits, process statistical analyses, provide advertising messages in line with the user's browsing habits, verify the correct functioning of the Website and identify anomalies and/or abuses. These data are kept for no more than 1 (one) year and for the period of time expressly indicated in point 4) relating to Cookies, without prejudice to any need to ascertain crimes by the judicial authorities.

#### **Data provided voluntarily by the user**

Tecnova processes personal data voluntarily provided by the user by filling in the "contact and assistance" and "newsletter" forms where special information on the processing of personal data pursuant to Article 13 of EU Regulation No. 2016/679 ("**GDPR**") is published. In any case, the data voluntarily provided by the user are: first name, last name, e-mail address, telephone number, reference company and any additional data you provide in the compilation (collectively "**Data**").

The optional and voluntary sending of e-mail messages to the addresses indicated in this Site entails the acquisition of the sender's e-mail address, as well as any additional personal data voluntarily indicated in the message. These data are used for the sole purpose of acknowledging the sender and are not disseminated in any way.

### **3. Data Processing purposes, legal basis and nature of the provision of Data**

As part of the consultation of the Website and the use of the services provided therein, the Data are processed for the following purpose:

- a) allowing Website browsing, obtaining anonymous statistical information on its use, as well as checking its correct functioning and ascertaining responsibility in the event of computer crimes ("**Website Navigation**"). The data processing finds its legal basis in the legitimate interest of the Company (art. 6.1 f) GDPR).
- b) acknowledge user requests made through the "Contact and Support" section ("**Inquiries**"). ("**Customer Support**"). The processing has a legal basis in the performance of the contract (Art. 6.1 b) GDPR) and fulfillment of related obligations to which Tecnova is subject (Art. 6.1 c) GDPR);
- c) allowing subscription to Tecnova's newsletter and the sending of e-mail communications containing product articles, news and information regarding activities and initiatives organized by Tecnova ("**Newsletter**"). The processing has a legal basis in consent (Art. 6.1 a) GDPR).
- d) Exercise and defense of Tecnova's rights in any forum including judicial, administrative, in arbitration and/or mediation and conciliation procedures ("**Defense**"). The processing has a legal basis in the legitimate interest of Tecnova (Art. 6.1 f) GDPR).

Except for navigation data (collected automatically), the provision of Data is of a nature necessary for the pursuit of the purposes set out in points b), c) and e) above.

Therefore, failure to provide the Data requested from the user will make it impossible for Tecnova to fulfill the request, without, however, the use of the Site and Tecnova's right of defense.

#### **4. Cookies**

The Website uses technical navigation cookies (first-party) to allow the user to navigate normally on the Website and to process statistical analysis. More information on the characteristics of cookies used on the Website can be found at our [Cookie Policy](#).

#### **5. Data processing methods**

For the purposes indicated in the previous point 3), Data will be processed using electronic and automated tools, in compliance with the regulatory provisions on the processing of personal data, adopting the appropriate security measures. Data processing is managed by internal Tecnova's personnel, specifically authorized, trained and instructed to ensure adequate security and confidentiality, as well as to avoid risks of loss and/or destruction and access by unauthorized parties.

#### **6. Data communication and dissemination**

Data will not be disseminated. Within the limits strictly pertinent to the purposes indicated in the previous point 3), the Data can be communicated to:

- subjects legitimated pursuant to the law or regulation, such as, by way of example and not limited to, the Public and Judicial Authorities;
- subjects who, as independent data controllers or data processors pursuant to art. 28 of the GDPR, are involved in the processing of Data (such as, by way of example and not limited to, the company responsible for the management and maintenance of IT systems, the company that manages the Website, the company that manages the service automation platform of email marketing).

The updated list of data processors can be requested via email.

#### **7. Data retention**

Tecnova retains the Data for the period of time strictly necessary to achieve the purposes for which it was collected and indicated in the appropriate notices.

#### **8. User's rights**

In compliance with the provisions of the GDPR and of the Legislative Decree no. 196/2003 (Part I - Title I - Chapter III), with reference to your Data you shall have the following rights:

- right of access to your Data in the cases provided for under the law (Art.15 of the GDPR );
- right to rectification of your inaccurate Data and to have your incomplete Data completed (Art. 16 of the GDPR );

- right to erasure of your Data, where one of the grounds provided in Art. 17 of the GDPR applies (e.g. Data are no longer necessary in relation to the purposes they are processed or Data have been unlawfully processed) (Art. 17 of the GDPR );
- right to restriction of processing if one of the reasons provided for under the law occurs (e.g. the accuracy of the Data is contested and their accuracy must be verified) (Art. 18 of the GDPR);
- right to Data portability that means the right to receive Data in a structured, commonly used and machine-readable format and to transmit those Data to another controller (Art. 20 of the GDPR);
- right to object, on grounds relating to your particular situation (Art. 21 of the GDPR)

All the rights listed above may be exercised by sending Tecnova a communication by certified e-mail to the address [tecnova.srl@legalmail.it](mailto:tecnova.srl@legalmail.it) or by registered letter to the following address: via Verbano n. 56/A, Oleggio (NO) - Italy.

### **9. Lodging a complaint**

If you believe that the processing of your Data infringes the provisions of the GDPR, you have the right to lodge a complaint with the Italian supervisor authority (Garante per la protezione dei dati personali) in accordance with the provisions of Art. 77 of the GDPR.

### **10. Transfer of Data to third countries**

Data are stored at Tecnova's headquarters and on servers located in the European Union. For the purpose of providing the e-mail marketing service, the Data are also subject to transfer to third countries; the company in charge of this service has provided adequate guarantees in accordance with Art. 46 of the Regulation (standard contractual clauses approved by the European Commission).