



## PRIVACY POLICY

Policy pursuant to article 13 of European Decree 2016/679 and Italian Legislative Decree 196/2003 provided by C.G.M. S.p.A. to its clients and suppliers. This policy has been written and issued in accordance with article 13 of European Directive 2016/679 (hereinafter referred to as the "European Directive"). This policy updates and replaces any previous versions released prior to now.

Given the above, please note that:

- 1) As a result of the establishment of our business relationship and during its entire course, our company will collect and process your personal data.
- 2) For the sake of clarity, we specify the following definitions taken from the abovementioned European Directive.

- 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.

- Data 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, deletion or destruction.

Therefore, in accordance with article 13 of European Directive 2016/679, we inform you that the collecting and processing of your personal data will be carried out by our company in accordance with the following policy:

- the Data Controller will process "identifying" personal data, such as first name, last name, company name, biographical data, tax code, VAT number, residence, registered office, telephone numbers, bank details, etc. This policy refers only to this website and not to other websites that users may access via links.

### **MODULARTEM**

## Browsing Data

During regular operations, the computer systems and software used to run this website will acquire personal data that must be transmitted via internet communication protocols. This information is not collected to be associated with the Data Subject; however, due to its very nature, it may permit users to be identified by processing and associating it with data held by third parties. This category of data includes: IP addresses or domain names of computers used by users to connect to the website; addresses in the Uniform Resource Identifier (URI) notation of requested resources; request times; methods used to submit requests to the server; size of files obtained in response; numerical codes indicating response status given by the server (successful, error, etc.); other parameters related to the operating systems and computer environments of users. These data are used for the sole purposes of obtaining anonymous, statistical information on website use and monitoring the correct functioning of the website and are deleted immediately after processing. The data may be used to ascertain responsibility in the case of alleged cybercrimes against the website. At present, apart from this eventuality, no web contact data are kept for more than seven days.

**Purposes:** your personal data will be processed, without the need for your specific consent, for the correct performance of accounting, tax, marketing and technical activities and for all general business activities related to our existing relationship, as well as for responding to requests via the "Contacts" section of the [ww.cgmspa.it](http://ww.cgmspa.it) website.

**Marketing purposes:** should you subscribe to our newsletter service, your personal data will be used to send you advertising material/communications via post, email, telephone, fax, text or media messages. You can revoke the processing of your personal data for this purpose by using the specific link at the bottom of the emails you will receive.

**Data storage limitation:** the Data Controller will process your personal data for the time necessary to fulfil the aforementioned purposes and, in any case, will keep the data for no more than 10 years from the conclusion of your contractual relationship with C.G.M. The Data Controller will process your personal data for marketing purposes until your explicit revocation, which may be exercised by using the specific link at the bottom of the newsletter sent periodically by the Data Controller. Processing will be based on principles of correctness, lawfulness and transparency and will be implemented with the aid of tools and procedures that avoid risk of loss, unauthorised access and illicit use or dissemination.

## **MODULARTEM**

Processing methods: your personal data will be processed through operations provided for in article 4 (2) of the GDPR, which are specifically: collection, registration, consultation, conservation, extraction, communication, deletion and destruction. Your personal data will be processed using both paper-based and computer-based tools and/or supports in compliance with regulations and according to the principles of fairness and lawfulness.

Voluntary data provision: processing of data to respond to requests for information is necessary to execute obligations resulting from a contract to which you are a party. Therefore, should you fail to provide the requested data, we cannot guarantee the fulfilment of contractual obligations. The provision of data for marketing purposes is optional; therefore, you can choose to not provide any data or to later revoke your consent for us to process your provided data. In such cases, you will not receive newsletters, business communications and advertising materials regarding services offered by the Data Controller. Any processing carried out prior to such revocation remains valid and lawful.

Subjects or categories of subjects (recipients) to whom personal data may be communicated or diffused: without the need for your explicit consent (as per article 6 (b) and (c) of the GDPR), for the purposes indicated in article 2 above, the Data Controller may communicate your personal data to inspection bodies and judicial authorities, as well as those subjects to whom disclosure is mandatory by law. Said subjects shall process your data in their role as independent data controllers.

Appointed data processors within our company: your personal data will be processed exclusively by appointed and duly authorised staff, as well as by third party companies or other subjects (for example, professional firms, consultants, etc.) who do outsourced work on behalf of the Data Controller, in their role as Data Supervisors.

Automated decision-making processes (e.g. profiling): we do not use any automated decision-making processes.

Rights of the Data Subject: in relation to the processing of your personal data, you have the right:

- to be informed about the details and registered office of the Data Controller, purposes and methods of processing, details and registered office of the Data Supervisor;
- to obtain from the Data Controller or the Data Supervisor and without delay:

**MODULARTEM**



1) confirmation that your personal data are being processed and communication in an intelligible form of said data and their origin, as well as the purposes for which the data are being processed;

2) deletion of your personal data, when: i) they are no longer needed for the purposes for which they were collected, ii) consent has been revoked and there are no other legal grounds for processing, iii) the data were processed illicitly, iv) the Data Subject has opposed the processing and there are no overriding legitimate grounds to process said data, v) the Data Controller is subject to a legal obligation to delete personal data;

3) updating, amendment or, if interested, integration of data;

4) attestation that the operations indicated in numbers 2) and 3) above and/or their content have been brought to the attention of whomever the data was communicated or disseminated to, except in the case in which this fulfilment is impossible or involves the use of means manifestly disproportionate to the protected right.

- to oppose the processing of your personal data pursuant to article 6 (1) (e) (f) for reasons related to their particular situation;

- to oppose the processing of your personal data for the purpose of direct marketing;

- to file a complaint with a supervisory authority;

- to receive your personal data in a structured format that is readable by an automatic device and to transmit said data to another data controller without any obstacles from the controller to whom the data had been originally provided. In exercising your rights regarding data transfer, you have the right to obtain direct transmission of your personal data from one data controller to another, if technically feasible;

- to not to be subjected to decisions based solely on automated processing, including profiling, which have legal ramifications that could affect your data and/or your person.

The Data Controller will provide one copy of the personal data being processed. Should the Data Subject request further copies, the Data Controller may charge a fee for expenses based on the actual administrative costs incurred.

Exercising of Rights: you may exercise the above rights at any time, including the revocation of your previously given consent, by sending either of the following communications to the Data Controller:

- a registered letter with acknowledgement of receipt to C.G.M. S.p.A., with registered office in Correggio (RE), Via Modena no. 22-24;

**MODULARTEM**



- an email to [info@cgmspa.it](mailto:info@cgmspa.it).

Or by using the specific link at the bottom of received emails to not receive any further communications, promotions, etc.

Data transfer to third countries: any transfer of personal data to a third country outside of the European Union or an international organisation will take place either on the basis of an adequacy decision of the Commission or on the basis of appropriate guarantees, in the case of transfers referred to in articles 46, 47 or 49, second paragraph, of the European Directive.

Data Controller and Supervisor: the Data Controller is C.G.M. S.p.A., located in Correggio (RE), Via Modena no. 22-24. An updated list of Data Supervisors is kept at the registered office of the Data Controller.

Further elements and indications may be added to this policy, either verbally or in writing, to better meet any of your privacy needs and comply with any changes to regulations.

#### TYPES OF DATA PROCESSED

#### USE OF COOKIES

With regard to the use of cookies, please refer to the "extended policy" published on this website, which has been written in accordance with the regulation issued on 8 May 2014 by the Italian Data Protection Authority and supplements and completes this document.

#### **MODULARTEM**