



## Privacy

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### INTRODUCTION AND REGULATORY REFERENCES

The following Privacy Policy describes how to manage this site in relation to the processing of personal data of users browsing.

This is an information note describing the protection of personal data of those who interact with web services, accessible by telematic means at the address: <http://www.tqmitaca.com>

The disclosure complies with Article 13 of Regulation (EU) 2016/679 of the European Parliament and Council of 27 April 2016 CE (General Regulation on Data Protection, published on 4 May 2016 in the Official Journal of the European Union, effective from 24 May 2016), to Recommendation no. 2/2001 that the European authorities for the protection of personal data, gathered in the Group established by art. 29 of the directive n. 95/46 / EC, adopted on 17 May 2001 to identify certain minimum requirements for the collection of personal data online, and, in particular, the methods, timing and nature of the information that the data controllers must provide to the users when they connect to web pages, and in light of the Provision of the Guarantor for the protection of personal data of May 8, 2014 on the "Identification of simplified procedures for disclosure and the acquisition of consent for the use of cookies "(hereinafter, the " Provision ") and in compliance with the current legislation on privacy.

This information is provided solely for this Internet site of which T.Q.M. Itaca Technology S.r.l. is the Data Controller and not for other possibly related websites present within this same site.

### DATA CONTROLLER

The data controller collected through the website is **T.Q.M. Itaca Technology S.r.l., Via Torquato Tasso, 18/19 - 25080 Mazzano (BS) Tel. +39 030 2590099 Fax. +39 030 2590596**

The complete list of designated data processors is available upon request from the data controller.

### GENERAL PRINCIPLES ON THE TREATMENT OF THE USER'S PERSONAL INFORMATION

Your personal information will be collected, stored, processed and transmitted in accordance with the criteria established by **T.Q.M. ITACA TECHNOLOGY S.R.L.** and to applicable laws, rules and regulations on data processing.

The principles relating to the processing of personal information of the user are as follows:

- (1) Your personal information will be processed in a correct and lawful manner;
- (2) Your personal information will be collected for specific, explicit and legitimate purposes and subsequently processed in a manner compatible with those purposes;



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- (3) Your personal information will be relevant, complete and proportionate to the purposes for which it is collected;
- (4) Your personal information will be accurate and, if necessary, updated to the best of our ability;
- (5) Your personal information will be protected against unauthorized access and processing through commercially and technically reasonable technical and organizational security measures and controls;
- (6) Your personal information will be stored as personal data no later than the time necessary to pursue the purposes for which the Personal Information was collected.

#### TYPES OF DATA COLLECTED

The website may collect different types of information when the user accesses or uses the Website:

"Personal information" means any information that directly identifies the user or information otherwise defined as "personal identification" in accordance with current legislation. This is, for example, information such as name, e-mail address; phone number, etc ...;

The Data Controller does not provide for processing of sensitive personal data (personal data suitable to reveal racial and ethnic origin, religious, philosophical or other beliefs, political opinions, membership of parties, trade unions, associations or organizations of a religious, philosophical, political or trade union nature, as well as personal data capable of revealing the state of health and sexual life) or judicial data.

Except for an explicit request or specific request, we ask the user not to send us, nor to disclose sensitive personal information on or through the Website or in any other way. In cases where we may request or encourage you to provide sensitive information, we should obtain your explicit consent.

The systems used to operate the Website may automatically register information on the use of the Website by the user. By way of example, the systems can record the information entered on the Website, the areas of the Web site visited, the IP address, type of browser and operating system, date and time.

These data are used for the sole purpose of obtaining anonymous and aggregate statistical information on the use of the site and to check its correct functioning and are deleted immediately after processing. The data could be used to ascertain responsibility in case of hypothetical and possible IT crimes to the detriment of the site.

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### PURPOSE OF THE TREATMENT

- We collect, store and process personal data for the purpose of providing the services offered through this website, or for legal obligations.
- The collected data will be used exclusively for the following purposes:
- manage requests received through the website;
- To best perform the services offered;
- Contact users (for example, by e-mail or by telephone) following requests received through the website;
- To comply with legal obligations deriving from tax and accounting legislation and any other applicable legislation;

### PROVISION OF DATA

Apart from what is described in the specific navigation data, the user is free to provide his personal data if requested and reported in the various forms of information request, availability of services, or other communications.

Failure to provide it will result in the inability to respond to your requests.

### METHOD OF DATA PROCESSING AND SECURITY

The use of personal data will take place with the support of paper, computer or electronic means for the purposes indicated below, for the time strictly necessary to achieve the purposes for which they were collected, or, where possible, until the time when the data controller should receive a request for deletion of data whose consent to treatment is optional and not mandatory.

Personal data will be stored in secure databases on company servers and will be mainly processed using automated methods.

The personal data are, in any case, processed in compliance with the provisions relating to the confidentiality of personal data contained in the Code, in the Regulations and in the Provisions issued by the Guarantor Authority.

The collected data are only handled by authorized personnel. All employees who access the data are appointed persons in charge of processing personal data, as required by current legislation.

The data collected may be updated periodically with information acquired during the course of the relationship established.

We will use commercially reasonable technical and organizational measures and controls to protect your personal information from loss, misuse and unauthorized access. Data transmitted

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or usable via the Internet can not be 100% secure. As a result, even if we protect all Personal Information, we can not guarantee or guarantee that such Personal Information will be fully protected against unlawful use by hackers or other nefarious criminal activities or in the event of a computer or network hardware or software failure. telecommunications. The data controller will inform the user if he is aware of a security breach concerning his personally identifiable information (as established and foreseen in cases of so-called "Data Breach" incidents, in compliance with current legislation) in our possession.

If you decide to give us your email address for any reason, you are expressly agreeing to receive electronic alerts in the event of a security breach.

## COMMUNICATION OF PERSONAL DATA

Without prejudice to communications made in fulfillment of a legal obligation, regulation or Community legislation, the data collected may be disclosed:

- to natural and/or juridical persons we use in the execution of services and for activities connected to them;
- to subjects delegated by us and/or assigned to carry out professional activities and technical maintenance (including maintenance of network equipment and networks of electronic communication of websites where data are present).

In any case, the aforementioned parties will be notified only the data necessary and relevant to the purposes of the processing to which they are responsible as external Data Processors/Responsible, appointed by the Data Controller as required by current legislation.

Personal data will therefore not be disseminated.

The Data Controller collaborates with law enforcement agencies and other public and public authorities to enforce the law, the rights of other users and third parties, including their intellectual property rights. Therefore, personal data collected may be disclosed, by way of example but not exhaustively, to public entities, in the event that this is necessary for purposes of defense, state security, prevention, detection or repression of crimes, in compliance with the rules governing this matter.

These public entities will have the right to request and obtain the personal information that concerns you even if this is necessary or appropriate for investigations or investigations relating to the commission of fraud, computer fraud, the violation of intellectual property rights, acts of hacking or to other illegal activities, which could expose either us or our users to legal, civil or criminal liability.

## RIGHTS OF INTERESTED PARTIES AND EXERCISE OF RIGHTS





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In compliance with current legislation, at any time you can request:

1. Confirmation of the existence or not of your personal data;
2. Knowing the content and the origin, the purposes and methods of treatment;
3. The logic applied in case of treatment carried out with the aid of electronic instruments;
4. The identification details of the owner, managers and subjects or categories of subjects to whom your personal data may be communicated.

Furthermore, it is your right to obtain:

1. The update, rectification, integration, the right to data portability;
2. The cancellation, transformation into anonymous form or blocking of your data processed in violation of the law;
3. The opposition in any case, for legitimate reasons, to the processing of data pertinent to the purpose of the collection.
4. The opposition to the processing of data for commercial purposes.

Under the Rules, you will also have the right to lodge a complaint with a supervisory authority.

To exercise your rights, you can contact the Data Controller **T.Q.M. Itaca Technology S.r.l., Via Torquato Tasso, 18/19 - 25080 Mazzano (BS) Tel. +39 030 2590099 Fax. +39 030 2590596.**

If the user contacts us requesting access to his Personal Information or to delete them from our systems and records, in compliance with this Privacy Policy and legal obligations, we will take care to accommodate the requested request within the foreseen time frame.

We inform users that, however, due to technical constraints and due to the backup of their systems, your Personal Information may continue to reside even after being deleted for a certain period of time and in part of our systems.

The data controller reserves the right to refuse requests for access or deletion of personal information if the disclosure or deletion of the requested information is not permitted by law.

To protect against illegal access requests, we reserve the right to request sufficient information to verify the identity of the party submitting the request before allowing access or making corrections.

## ADDITIONAL PROVISIONS

### Use of the website by minors

The website is not intended for persons under the age of 18 and is therefore not directed to children under the age of 13. We do not intentionally collect or request personal information



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about children under the age of 13.

### Data transfer

The personal data collected will be stored in databases on our servers at our headquarters, on Italian territory.

### UPDATE OF THE PRESENT PRIVACY POLICY

This Privacy Policy was updated on June 13<sup>th</sup> 2018.

The data controller reserves the right to make changes to the Site and to this Privacy Policy at any time.

The user must always refer, as current version, to the text published online.

The changes will become operational when they are published on the Website.

The continuation of the use of the Site by the user, following a modification, will be considered as an acceptance of these changes.

All users can check at any time, by connecting to the Site, the latest updated version of the Privacy Policy.