

# Privacy policy “website”



## 1. Data controller

**Storti S.p.A.**, with registered office in Via Francesco Dioli, 11, 26045 Motta Baluffi (CR), Tax ID and VAT 00765230198, hereinafter referred to as “Data Controller”, guarantees compliance with personal data protection regulations by providing the following information on the processing of data pursuant to Art. 13, EU Regulation 2016/679 (General Data Protection Regulation - GDPR) as amended.



## 2. Data processed, purpose and legal basis for processing

### 2.1. Data generated by access to the website

The computer systems and software procedures used to operate this website automatically acquire, in the course of their normal operation, certain information whose transmission is implicit in the use of Internet communication protocols.

The information collected may consist of the following:

- domain names;
- Internet Protocol (IP) address;
- operating system used;
- browser type and parameters of the device used to connect to the website;
- the visitor’s source (referral) and exit web pages.

This information is processed automatically and collected in an aggregate form only for the purpose of verifying the proper functioning of the website, and for security reasons.

The legal basis legitimising the processing is the legitimate interest of the Controller.

### 2.2. Data recorded for security purposes

For security purposes (spam filters, firewalls, virus detection), automatically recorded data may possibly also include personal data such as the IP address, which could be used, in accordance with the relevant laws in force, to block attempts to damage the website itself or to cause damage to other users, or in any case harmful or criminal activities. These data are never used for user identification or profiling, but only for the protection of the website and its users.

The legal basis legitimising the processing is the legitimate interest of the Controller.

### 2.3. Data voluntarily provided by the user via the “contact” form

The personal data provided by the user via the form are collected and processed for the following purposes:

- a) for the performance of customer relationship activities in accordance with contractual and/or pre-contractual agreements;
- b) for administrative purposes and for the fulfilment of legal obligations such as, for example, those of an accounting or tax nature, or to comply with requests from judicial authorities;
- c) in the presence of specific consent, to periodically send, by mail, telephone, e-mail, text message or messaging app communications concerning updates on our activities and product development information, invitations to events, trade fairs, training courses, webinars, special promotions and a list of used machines and an invitation to participate in market analysis and research;
- d) to occasionally send e-mails relating to products and/or services already provided or similar (so-called “soft-spam”);
- e) in the case of sending CVs, exclusively for selection purposes.

The legal basis legitimising the processing:

- with respect to the purposes set out under 2.3 letters a), b) d) is the performance of a contract to which the data subject is a party or the execution of pre-contractual measures taken at the request of the data subject as well as the legal obligation in the case of a request by a judicial authority;
- with respect to the purposes under point 2.3 letter c) is the legitimate interest of the Controller.

### 2.4. Data collected via the “Customer Service” form

It is specified that the data collected via the form on the “Customer Service” page are sent to us on the voluntary action of the website user.

In particular, the presence of the freely fillable “message” field is in no way controllable by the Controller but constitutes an integral part of the functionality of the message sending system.



## 3. Nature of the provision

Apart from what has been specified for navigation data and for data collected via contact forms, the provision of data:

- with respect to the purposes under point 2.3 letter a) and b) is mandatory, but any refusal will make it impossible for the Controller to fulfil its contractual commitments;
- with respect to the purposes set out in point 2.3 letter c) is optional, but refusal will make it impossible for the Controller to send e-mails relating to products already purchased or similar;
- with respect to the purposes referred to in point 2.3 letter d) is also optional but inherent in the candidate’s request; therefore, any refusal will make it impossible for the Data Controller to proceed with the process of evaluating and selecting the application.



## 4. Locations and methods of data processing and storage times

The data collected by the website are processed at the Data Controller's registered office, and at the data centres of the registrar OVH sas and the web hosting provider Serverplan srl, a single-member company, regularly referred to as Data Processors.

For the sake of completeness, we would like to inform you that you can find more information about the GDPR compliance of Serverplan srl single-member company [here](#) and [here](#) (Art. 20.2) and of OVH [here](#).

The data collected shall be processed by electronic means or otherwise automated, computerised and telematic tools, or by means of manual processing with logic strictly related to the purposes which the personal data were collected for and, however, in such a way as to guarantee their security.

The data are stored for the time strictly necessary to manage the purposes for which the data are processed ('principle of storage limitation', Art.5, EU Regulation 2016/679) or in compliance with the deadlines set forth by current regulations and legal obligations.

Checks are carried out periodically on the obsolescence of stored data in relation to the purposes which they were collected for.

The data collected through navigation, used for security purposes, are stored for 5 years.

However, the Data Controller applies rules that prevent the storage of data indefinitely and thus limits the storage time in compliance with the principle of minimising data processing.



## 5. Persons authorised to process, data processors and communication of data

The processing of the data collected is carried out by the Data Controller's own personnel, identified for this purpose and authorised to process them in accordance with specific instructions given in compliance with the applicable regulations.

The data collected, to the extent pertinent to the indicated purposes of the processing and where necessary or instrumental to the performance of said purposes, may be processed by third parties appointed as external data processors, or, as the case may be, communicated thereto as autonomous controllers, and specifically:

- companies that are part of our corporate group for the purposes set out in section 2.3 letters a), b) and e);
- persons, companies, associations or professional firms providing assistance and consultancy to our Company, for the purposes set out in point 2.3 letters b) and e);
- companies, bodies, associations providing services connected with and instrumental to the fulfilment of the above-mentioned purposes (market analysis and research service, credit card payment management, computer system maintenance).

The data collected may be provided in the event of a legitimate request by the Judicial Authority, solely in the cases provided for by law.

Under no circumstances and for no reason whatsoever shall your data be disseminated.



## 6. Data transfer to non-EU countries

The data may be transferred abroad to non-European countries, and in particular to the United States, only after verifying the Standard Contractual Clauses adopted/approved by the European Commission pursuant to Art. 46, para. 2 letters c) and d) of the GDPR or the binding rules for the company referred to in Art. 47 of the GDPR or, failing that, by virtue of one of the derogatory measures referred to in Art. 49 of the GDPR.

Transfer to the United States is authorised under the specific agreement called the EU-US Data Privacy Framework (available [here](#)), so no further consent is required.

You can find information about data use and GDPR compliance at the following links:

- Google [here](#);
- LinkedIn [here](#) and [here](#);
- Google Analytics [here](#) and [here](#).



## 7. Rights of the data subject

In relation to the Personal Data provided, the data subject has the right to exercise the following rights:

- (Art. 7.3 EU Regulation 679/2016 - GDPR) withdrawal of consent;
- (Art. 15 EU Regulation 679/2016 - GDPR) access and obtain a copy;
- (Art. 16 EU Regulation 679/2016 - GDPR) request rectification;
- (Art. 17 EU Regulation 679/2016 - GDPR) request erasure ('right to be forgotten');
- (Art. 18 EU Regulation 679/2016 - GDPR) obtain restriction of processing;
- (Art. 20 EU Regulation 679/2016 - GDPR) receive them in a structured, commonly used and machine-readable format for the purpose of exercising the right to portability;
- (Art. 21 EU Regulation 679/2016 - GDPR) object to the processing.

The data subject may exercise his/her rights, as well as request further information regarding his/her Personal Data, by sending an e-mail to [privacy@storti.it](mailto:privacy@storti.it) specifying in the subject line the content of his/her request.

Requests relating to the exercise of the user's rights shall be processed without undue delay and, however, within one month of the request; only in cases of particular complexity and number of requests may this period be extended by a further two (2) months.

We would like to remind you that it is your right (pursuant to Art. 77 EU Regulation 679/2016 - GDPR) to file a complaint with the Data Protection Authority, whose contact details are available [here](#).

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