



PRIVACY POLICY

(pursuant to the articles 13 and 14 EU Reg. 2016/679 “GDPR”)

This information on the processing of personal data describes the processing of personal data entered or collected on the site: <https://www.katoimer.com>

DEFINITIONS

Aggregate data. Aggregated data means information about groups or categories of users, which does not identify and cannot reasonably be used to identify an individual user.

Anonymous data. Anonymous data means information that does not directly or indirectly identify you and cannot reasonably be used to identify an individual user.

Application. Application means a program or service managed by the Data Controller (or on behalf of the Data Controller) which can be viewed on various online, mobile or other environments and platforms, including those managed by third parties, which they allow us to interact directly with our users.

Interested. It is the natural person to whom the personal data refers, identified or identifiable, i.e. who can also be identified indirectly, by reference to information or characteristic elements, or through the intersection of multiple personal data.

Minors. Minors are individuals identified by us as minors who are not legally capable of consenting to the collection and processing of their personal data.

Data controller. The natural or legal person who determines the purposes and means of the processing of personal data.

Responsible for data processing. The person responsible for processing personal data is a natural or legal person who processes personal data on behalf of one or more data controllers, authorized to carry out data processing only according to the indications of the data controller.

IP address. The IP address is associated with the access point through which you connect to the Internet and is usually controlled by your Internet Service Provider (ISP).

Notification. A notice may be sent by email to you at your last email address, by posting notices of changes on the Sites and Applications or by other means pursuant to applicable law.

Personal data. Personal data means information relating to a natural person that identifies (directly or indirectly) a specific individual, for example name, postal address, e-mail address, telephone



number, browsing data, IP address , characteristic elements of his physical, physiological, genetic, psychic, economic, cultural or social identity, data relating to choices and habits.

Public forums. The Site and Applications may offer message boards, conversation pages, chat rooms, social community environments, profile pages and other forums whose audiences are not limited. If you provide personal information when using such features, that information may be made public or otherwise disclosed without restriction for use by us or others. To request the deletion of personal data from the public forum on one of our Sites or Applications, please contact the Data Controller.

COLLECTED DATA

This site collects and processes Personal Data, as defined by the GDPR, independently or through third parties, or provided voluntarily by the user, including:

- Cookies and Usage Data, collected through automatic processes;
- Personal data (Name, Surname, Company, Sector, Telephone, E-mail, Role and CV, etc.) – the latter released voluntarily by the user in the various compilation forms.

When indicated by the “*” character, the Data requested by this site is mandatory. If the User refuses to communicate them, it may be impossible for the Owner to provide the Service or fulfill the request. In cases where this site indicates some Data as optional, Users are free to refrain from communicating them, without this having any consequence on the availability of the Service or its operation. Users who have doubts about which Data is mandatory are encouraged to contact the Data Controller.

Any use of Cookies - or other tracking tools - by this Site or by the owners of third-party services used by this Application, unless otherwise specified, has the purpose of providing the Service requested by the User, in addition to further purposes described in this document and in the Cookie Policy, to which reference is made.

TREATMENT METHODS

The Data Controller adopts appropriate security measures aimed at preventing unauthorized access, disclosure, modification or destruction of Personal Data. The processing is carried out using IT and/or telematic tools, with organizational methods and with logic strictly related to the purposes indicated. In addition to the Data Controller, in some cases, other internal parties involved may have access to the Data, or external parties (such as third-party technical service providers, hosting providers, IT companies, communication agencies) appointed as Data Processors by the Data Controller.

PURPOSE OF THE PROCESSING OF THE COLLECTED DATA AND STORAGE PERIOD

The User's Data is collected for the purposes set out below:



a) to guarantee registration on the Site, allow the user to access some web pages of the Site where it is possible to use specific online services, guarantee the correct provision of the services requested through the Sites, Applications or other channels, and, therefore, to correctly and punctually fulfill all obligations deriving from the established contractual relationship. This purpose includes the management of the newsletter resulting from a free registration of the User on a dedicated form. The data will be kept for ten years from the date of termination of the contractual relationship;

b) to comply with legal and regulatory provisions, including fiscal ones, or to carry out an order from judicial or police authorities or supervisory bodies. The data will be kept for ten years from the date of collection;

c) finally, the primary purposes also include certain technical treatments carried out through so-called "technical cookies" based on what is illustrated in more detail in the Cookie Policy. In these specific cases, the technical processing is aimed solely at carrying out the transmission of a communication over an electronic communications network to the extent strictly necessary to provide the services explicitly requested by users. The data will be used for the time strictly necessary to manage the functionality provided by the cookies.

In all the cases illustrated above in points a), b), c), the Data Controller is not obliged to acquire specific consent from the interested party. All the processing illustrated above in fact pursues primary purposes for which current legislation excludes the need to acquire specific consent from the interested party, either because the processing is necessary to fulfill an obligation established by law, a regulation or community legislation, or because the processing is necessary to carry out obligations deriving from a contract of which the interested party is a party, or to fulfill, before the conclusion of the contract, specific requests of the interested party, or to pursue legitimate interests of the owner also taking into account the reasonable expectations of interested parties.

Should the user not intend to provide the personal data requested and necessary on the basis of the foregoing, the consequence would be that it would be impossible to register on the Site and benefit from all the services for which registration and provision of data they are however technically and contractually necessary.

It would still be possible to browse the Site as an unregistered and anonymous user and view only the contents and materials available without registration.

PLACE OF TREATMENT

The data collected by the site are processed by the Data Controller and are handled only by technical personnel authorized to process or appointed as external data processor pursuant to art. 28 EU Reg. 2016/679. This site may share some of the data collected with services located outside the European Union area, always respecting the rights and guarantees provided for by current legislation, pursuant to articles. 44 et seq. of EU Reg. 2016/679.

CATEGORIES OF RECIPIENTS, COMMUNICATION AND DISSEMINATION OF DATA

For the purposes indicated above, the data collected may be made accessible or communicated:



- to employees of the Data Controller, in their capacity as authorized data processors (or so-called "Data Processors"), within the scope of their respective duties and in accordance with the instructions received. Such individuals are however subject to confidentiality and confidentiality obligations;
- to third parties who carry out outsourced activities on behalf of the Owner as trusted external parties to whom the Owner entrusts certain activities, or part of them, functional to the provision and distribution of the services offered through the Site. In this case, said subjects will be appointed as Data Controllers pursuant to art. 28 GDPR. The complete list of Managers is available by requesting it from the Data Controller via the contact channels indicated in this document;
- to all those subjects (including Public Authorities) who have access to personal data pursuant to regulatory or administrative provisions;
- to all those public and/or private entities, natural and/or legal persons (legal, administrative and tax consultancy firms, judicial offices, chambers of commerce, chambers and offices of labour, etc.), if communication is necessary or functional to the correct fulfillment of the contractual obligations undertaken, as well as the obligations deriving from the law;
- to banking institutions and companies that manage national or international payment circuits through which online payments are made for products purchased through the Sites.

We do not collect personal data to resell or transfer it to third parties for marketing purposes. In any case, personal data will not be disclosed.

POSSIBLE INDICATION BY THE INTERESTED PARTY OF PERSONAL DATA OF THIRD PARTIES

The user acknowledges that any indication of personal and contact data of any third party other than the interested party represents the processing of personal data with respect to which he acts as an independent owner, assuming all the obligations and responsibilities established by current law. legislation regarding personal data. The user grants on this point the broadest indemnity with respect to any dispute, claim, request for compensation for damage from processing or otherwise that may reach the Data Controller from any interested third party due to the provision of the data indicated by the user in violation of the applicable personal data protection regulations.

TRANSFER, STORAGE AND PROCESSING OF PERSONAL DATA INTERNATIONALLY

The management and storage of personal data takes place on servers located within the European Union. The Data Controller may store personal data in a cloud, which means that the data may be processed by cloud service providers on its behalf. In any case, cloud service providers will be required to store the data on servers located in the European Union.

Where our business involves the transfer of personal data to third parties located in different locations around the world, for the purposes described in this privacy policy, wherever personal data is transferred, stored or processed by us, we will adopt appropriate organizational and contractual



measures to safeguard personal data and we will impose similar, but no less restrictive, requirements on cloud service providers, including the obligation to process personal data exclusively for the purposes indicated above.

THE PRIVACY OF MINORS

We do not intentionally collect personal data from Minors in connection with the functionality of the Site. In accordance with applicable laws, the Parent must provide consent to the collection of the Minor's personal data; registration on the Minor's Site must therefore be authorized by the Parent and carried out under the supervision of the Parent himself, for this reason the email address provided must be that of the Parent. The parent has the right to view and request the deletion of the Minor's personal data.

SECURITY MEASURES

This site processes user data in a lawful and correct manner, adopting appropriate security measures aimed at preventing unauthorized access, disclosure, modification or unauthorized destruction of data. The processing is carried out using IT and/or telematic tools, with organizational methods and with logic strictly related to the purposes indicated. In addition to the owner, in some cases, categories of persons involved in the organization of the site or external parties (such as third-party technical service providers, hosting providers, IT companies, communication agencies) may have access to the data.

USER RIGHTS

In relation to the personal data themselves, the interested party may exercise the rights provided for in the articles. 15 et seq. GDPR and precisely:

Right of access (art. 15) – consists of obtaining confirmation from the Data Controller as to whether or not personal data concerning him or her are being processed and in this case, obtaining access to the same data and to certain information (explicit in the cited article) regarding the data in question.

Right of rectification (art. 16) - It consists in giving the interested party the possibility to modify their data if they are inaccurate. **Right of cancellation (art. 17)** - Possibility for the interested party to delete their data held by the owner when, for example, consent to processing is revoked or the pursued purpose has been achieved or when it is unlawful. Obviously, it will not always be possible to comply with the cancellation request. This happens, for example, when the data is used to fulfill a legal obligation or is necessary for the defense of a right in court. **Right to object (art. 21)** - The possibility of objecting to processing must be guaranteed when the legal basis is legitimate interest or the execution of a task of public interest. This right also has its limits as there may be cases in which the legitimate interest of the owner prevails over that of the interested party, it will be essential to carry out the right balance, or the processing is necessary for a task of public interest or the assessment, defense or exercise of a right before a judge. **Right to portability (art. 20)** – provides that, if processing is based on contract or consent, in the event of a request, the interested party is provided with his/her personal data in a structured format readable by an automatic device (json , xml, csv), this right applies only to data provided spontaneously and not to inferred or derived data.



Right of revocation (art. 7) - In case of signing any form of consent to the processing requested by the Data Controller, please note that the interested party can revoke it at any time, without prejudice to the mandatory obligations established by the legislation in force at the time of the request of revocation, by contacting the Data Controller at the contact details indicated above, or by email, specifying the subject of your request, the right you intend to exercise and attaching a photocopy of an identity document certifying the legitimacy of the request .

The interested party has the right to lodge a complaint with the competent Supervisory Authority in the Member State in which he habitually resides or works or in the State in which the alleged violation occurred.

All the aforementioned rights can be exercised by sending a specific request to the Data Controller via the contact channels indicated in this information.

DATA CONTROLLER - CONTACT DETAILS FOR THE OPERATION OF RIGHTS BY THE INTERESTED PARTY

The Data Controller responsible for the personal information collected through the sites, applications or other channels identified above is:

KATO IMER S.P.A., Località Cusona s/n, 53037 San Gimignano (SI), Tel: +39 0577 95121, Fax: +39 0577 982400, email: info@katoimer.com.
