

## **PRIVACY POLICY**

Ironika S.r.l., with its registered office at 1 Via Fossano, 12030 Marene (Cuneo) (hereinafter referred to as the “**Data Controller**”), in its capacity as Data Controller, hereby informs you that in accordance with Article 13 of Regulation (EU) 2016/679 (hereinafter, “**GDPR**”) your data shall be processed with the following methods and for the following purposes:

### **1. Subject of Data Processing**

The Data Controller shall process your personal information and details (i.e. name, surname, company name, address, telephone number, e-mail, bank and payment coordinates) – hereinafter referred to as “**personal data**” or “**data**”) as communicated by yourself upon signing agreements for the use of the Data Controller’s services.

Ironika S.r.l. shall not collect or process – by means of its website – sensitive data such as, by way of example: data revealing racial or ethnic origins; religious, philosophical, or other beliefs; political opinions, membership to political parties, labour unions, and entities or organizations of a religious, philosophical, political, or union-related nature; personal data revealing health status and sexual life.

Ironika S.r.l. shall use only the personal data strictly necessary to provide the services requested by its users, and commits to not sell them or transmit them to third parties.

The data supplied that shall be processed for the purposes related to website activity shall be stored and processed so as to guarantee the privacy of the data supplier.

### **2. Purposes of data processing**

Your personal data shall be processed:

A) without your specific consent in accordance with Article 6, items (b) and (e) of the GDPR, for the following Service Purposes:

- to complete agreements to make use of the Data Controller’s services;
- to comply with precontractual, contractual, and tax purposes deriving from the relations in place with yourself;
- to comply with the obligations established by law, by a regulation, by EU standards, or by an Authority (i.e. obligations concerning money laundering);
- to exercise the Data Controller’s rights, for example the right of representation and defence in legal proceedings;

B) Only upon your specific and distinct consent – in accordance with Article 7 of the GDPR – for the following Marketing Purposes:

- to send you – by e-mail, mail, SMS and/or telephone – commercial communications and/or advertising material concerning the products or services offered by the Data Controller, and to record your level of satisfaction concerning service quality;

- to send you – by e-mail, mail, SMS and/or telephone – commercial communications and/or advertising material by third parties.

We hereby report that, should you already be our customer, we may send you commercial communications related to Data Controller services and products related to the ones you have made use of in the past, unless you should deny consent to such.

### **Type of data processed**

Data voluntarily supplied by the user.

The optional, explicit, and voluntary provision of personal data implies the subsequent acquisition of the same in order to provide the services requested.

#### Navigation Data

IT systems and software processes designed for the operation of this website acquire, throughout their normal operation, certain personal data whose transmission is implicit to the use of Internet communication protocols.

Such data are not collected to be linked to the Data Subject, but by their very nature they may – by means of processing and matching with data held by third parties – allow the identification of users.

This data category includes IP addresses or domain names of computers of users connecting to the website, along with URI (Uniform Resource Identifier) strings, request times, methods used in making a request to the server, size of the file returned in response, numeric code indicating the status of the response given by the server (positive outcome, error, etc.), and other parameters related to the operating system and the user's IT infrastructure.

These data shall be used with the sole purpose of extracting anonymous statistical information concerning use of the website, and to monitor its correct operation. They shall be immediately erased following the processing phase. The data may be utilized in an eventual investigation in case of suspected cybercrimes against the website

#### Cookies:

In terms of the use of cookies used to transmit personal data, please read the Cookie Policy.

### **3. Data processing Method**

Data Processing shall occur – in accordance with Article 4, paragraph 2 of the GDPR – by means of the following operations: collection, recording, organization, storage, consultation, processing, modification, selection, withdrawal, comparison, use, correlation, blockage, communication, cancellation, or destruction of the data. Your data shall be processed by means of both printed, electronic and/or automatic tools.

The Data Controller shall store the personal data for the time necessary to achieve the above purposes, and in any case for a period no greater than 10 years beyond the agreement termination – for Service Purposes – or greater than 2 years subsequent to data collection – for Marketing Purposes.

### **4. Access to the data**

Your data may be made accessible for the purposes specified in articles 2 (a) and 2 (b):

- to employees and co-operators of the Data Controller in Italy and abroad, in their capacity as internal data managers and/or agents in charge of data processing and/or system administrators;
- to third-party companies or other entities (including but not limited to financial institutions, professional agencies, consultants, insurance companies – for the performance of insurance services) which perform outsourced activities on behalf of the Data Controller, in their capacity as third-party data processors.

### **5. Data communication**

The Data Controller may communicate your data for the purposes specified in Article 2 (a) without your explicit consent (pursuant to Article 6, items (b) and (c) of the GDPR) to supervisory authorities, judicial authorities, and insurance companies (for the performance of insurance services), as well as subjects to which communication of such data is a legal obligation for the performance of the said purposes. Such subjects shall process the data in their capacity as independent data controllers.

Your data shall not be subject to circulation.

### **6. Data transfer**

Your personal data shall be stored on servers located within the European Union. It is in any case understood that – should it be deemed necessary – the Data Controller shall have the faculty to move the servers even outside the EU. In such case, the Data Controller hereby guarantees that the transfer of data outside the EU shall be made in compliance with the related legal provisions, upon stipulation of the standard contractual clauses established by the European Union.

## **7. Nature of data consent and consequences of a refusal to answer**

Data consent for the purposes specified in Article 2 (a) is compulsory. In its absence, we cannot guarantee the Services specified in Article 2 (a), item 3.

Data consent for the purposes specified in Article 2 (b) is instead optional. You may thus decide to not provide any data or to subsequently deny the possibility to process data already provided: in such case, you may not receive newsletters, commercial communications, and advertising material related to the Services offered by the Data Controller. You shall in any case continue to have the right to the Services specified in Article 2 (a).

## **8. Rights of the Data Subject**

In your capacity as Data Subject, you shall benefit of the rights specified in Article 15 of the GDPR, and more specifically:

- i. being given confirmation of the existence of personal data concerning yourself, even if not yet recorded, and their communication in intelligible form;
- ii. obtain the indication of: a) the origin of the personal data; b) the purposes and methods of processing; c) the logic applied in case of processing carried out with the help of electronic instruments; d) the identity of the data controller, data processors and the representative designated in accordance with Article 3, paragraph 1, of the GDPR; e) the subjects or categories of subjects to whom or which the personal data may be communicated or who may acknowledge them as representatives designated in the national territory, managers, or agents;
- iii. obtain: a) the update, rectification or, upon request, the integration of the data; b) the cancellation, transformation into anonymous form or blockage of data processed unlawfully, including data whose retention is unnecessary for the purposes for which the data were collected or subsequently processed; c) certification that the operations indicated under letters (a) and (b) have been notified, along with their contents, to the entities to whom or which the data have been communicated or disclosed, unless this requirement proves impossible or involves a manifestly disproportionate effort in relation to the right that is to be protected;
- iv. object, in full or in part: a) for legitimate reasons, to the processing of personal data concerning yourself, even if pertinent to the purpose of collection; b) to the processing of personal data concerning yourself for the purpose of sending advertising material, direct marketing, or for the performance of market research or commercial communication surveys, by means of automated, unassisted calling services, e-mail, or traditional telephone and/or mail-based marketing services. It is specified that the data subject's right to object as described in item (b) – for direct marketing by means of automated services – is applicable to traditional methods as well, and in any case notwithstanding the right to object even only in part. Therefore, as the Data Subject you may decide whether or not to receive communication only through traditional methods, or only through automated methods, or neither of the communication types.

Moreover, where applicable, you may exercise the rights outlined in Articles 16-21 of the GDPR (right to rectification, right to be forgotten, right to limitation, right to data portability, right to object), as well as the right to lodge a complaint to the Supervisory Authority.

## **9. Method of exercising rights**

You may exercise the said rights at any time by sending an e-mail to the following address: [info@ironika.it](mailto:info@ironika.it).

## **12. Data Controller and Data Protection Officer**

The Data Controller is Ironika S.r.l., with its registered office at 1 Via Fossano, 12030 Marene (Cuneo). The updated list of Data Protection Officers and persons in charge of data processing is held at the Data Controller's registered office.