# PRIVACY POLICY GIANNESCHI PUMPS AND BLOWERS S.R.L.

GIANNESCHI PUMPS AND BLOWERS S.R.L. describes the management methods of this site (the "GIANNESCHI S.R.L. site") with reference to the processing of personal data of users who consult it or send electronic mail messages (e-mails) to the addresses available on the GIANNESCHI S.R.L.

If you have any doubts, you can contact us at privacy@gianneschi.net.

# WHY THIS PRIVACY POLICY?

Starting from 25 May 2018, new privacy rules are applied in all states of the European Union, imposed by EU Regulation no. 2016/679 General Data Protection Regulation, which from now on we will call RGPD), as well as national laws, such as Legislative Decree 101/18.

The RGPD provides for greater protection of users and imposes new obligations and responsibilities on those who process personal data, including through websites.

To learn more about the RGPD, you can consult the useful and in-depth Section edited by the Italian Data Protection Authority: It will help you better understand the new rules and get to know your rights.

A fundamental principle is that of transparency: users must know in advance, in a clear and complete way, which personal information will be collected, who will process it, for what reasons and for how long, if it will be used for commercial purposes, or for profiling purposes., if they will be disclosed to third parties, etc. and being able to effectively control the management of their data.

This information is provided in accordance with Article 13 of the RGPD, with Legislative Decree 101/18 and is also inspired by the Guidelines of the Working Group pursuant to Article 29 on Transparency.

The information is aimed at all those who interact with the **GIANNESCHI S.R.L.** accessible electronically from the address www.gianneschi.net corresponding to the initial page or "home page" of the **GIANNESCHI S.R.L.** In consulting the **GIANNESCHI S.R.L.** as well as by sending communications to the contacts on the **GIANNESCHI S.R.L.** data can be processed that make it possible to identify - directly or indirectly - users.

# WHICH WEBSITES DOES THE GIANNESCHI S.R.L. PRIVACY POLICY APPLY TO?

The policy is provided only for the **GIANNESCHI S.R.L.** and not for other websites that may be consulted by the user through the links on the **GIANNESCHI S.R.L.** 

The existence of one or more links to a site not belonging to **GIANNESCHI S.R.L**. does not imply the approval or acceptance of responsibility by **GIANNESCHI S.R.L**. about the content or use of said third party site.

Users wishing to send data to or through third party websites are advised to carefully read the relevant privacy statements before providing personal data.

### HOLDER OF THE TREATMENT AND CONTACTS

The Data Controller of your personal data referred to in this Notice is **GIANNESCHI S.R.L**. REGISTERED OFFICE: Via Luigi Gianneschi, 270, 55041, Capezzano Pianore (LU); Tax Code and

VAT number 01619620469; PEC gianneschisrl@cgn.legalmail.it reachable for any communication or request regarding your data also at the e-mail address privacy@gianneschi.net for the provisions of Regulation 2016/679 and Legislative Decree 101/18.

#### TYPES OF DATA PROCESSED

# Navigation data

Access and consultation of the **GIANNESCHI S.R.L**. site do not provide for the collection of personal data by **GIANNESCHI SRL**, except in the "Contacts" section and in the "Registration" section, where there is a specific form prepared whose compilation involves the subsequent acquisition of the name, e-mail address and user data, necessary to respond to requests for information or registration formulated, and for which specific information will be provided.

The computer system - as part of its normal operation - may need to store some of your navigation data. The transmission of this data is automatic and is necessary for the operation of the **GIANNESCHI S.R.L.** site, being linked to the use of Internet communication protocols. These data are not collected in order to be associated with your identity, however they could indirectly - through processing and association with data held by third parties - allow your identification. For this reason, they could be considered "personal data" under the GDPR.

These are, for example, the IP addresses or domain names of the computers used by users who connect to the **GIANNESCHI SRL** Site, the addresses in URI (Uniform Resource Identifier) notation, the resources requested, the time of the request, the method used in submitting the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the operating system and the IT environment of the user.

# Cookies

The cookies used by the GIANNESCHI S.R.L., they are first part technicians or analytics.

The website **GIANNESCHI S.R.L.** does not use first-party profiling cookies to perform statistics and sampling related to commercial activity and to send advertising messages in line with the preferences that the user manifests while surfing the net.

The website **GIANNESCHI S.R.L.** does not use the so-called persistent cookies of any kind.

The use of so-called session cookies (which are not stored permanently on the user's computer and disappear when the browser is closed) is strictly limited to the transmission of session identifiers (consisting of random numbers generated by the server) necessary to allow safe browsing and efficient of the **GIANNESCHI S.R.L.**. The so-called session cookies used on the **GIANNESCHI S.R.L.** site avoid the use of other IT techniques that are potentially prejudicial to the confidentiality of users' browsing and do not allow the acquisition of personal identification data of the user. You can find more information in our Cookie Policy.

#### Data provided voluntarily by the user

The optional, explicit and voluntary sending of e-mail messages to the addresses indicated on the **GIANNESCHI S.R.L.** site implies the subsequent acquisition of the sender's address, necessary to respond to requests, as well as any other personal data included in the message.

On all pages of the **GIANNESCHI S.R.L.** in which there are features or modules that allow users to voluntarily provide personal data, specific dedicated privacy policies are provided, directly and easily accessible from each page so that users can be fully aware of the use that, case by case, will be made of their personal data.

GIANNESCHI S.R.L. as Data Controller specifies that, if the User voluntarily and spontaneously provides personal data belonging to particular categories, pursuant to art. 9 of the G.D.P.R. (i.e. information suitable for revealing racial origin, religious, philosophical or other beliefs, political opinions, membership of parties, trade unions or organizations of a religious, philosophical, political or trade union nature, as well as personal data suitable for revealing the state of health and sexual orientation), GIANNESCHI S.R.L. will treat them with the utmost confidentiality, in compliance with current legislation and for the exclusive purposes indicated in the specific information. These data will be disclosed only to the recipients indicated in each specific Notice and will not be used for commercial purposes, unless you provide us with your express consent, as specified below.

#### **Commercial communications**

GIANNESCHI S.R.L. may send commercial communications exclusively to those users who have provided specific informed consent by accessing specific pages on the GIANNESCHI S.R.L.

Before giving their consent, users are duly informed of the fact that **GIANNESCHI S.R.L.**, in accordance with the provisions of articles 13 G.D.P.R. and articles 8 and 9 of Legislative Decree 70/03, may send messages with commercial and / or promotional content relating to their services or organized activities to the e-mail address and / or to the User's home.

The User who has consented to the sending of commercial communications may, at any time, decide to withdraw their consent. In this case **GIANNESCHI S.R.L.** Withdrawing your consent will be possible with the same simple methods in which it was provided.

The withdrawal of consent, as required by the RGPD, does not affect the lawfulness of the processing based on the consent previously given.

# PURPOSE AND LEGAL BASIS OF THE PROCESSING

Navigation data

The data collected automatically by the system are used:

- in order to allow the User to use the features of the GIANNESCHI S.R.L. site;
- in order to obtain anonymous statistical information on the use of the **GIANNESCHI S.R.L.** and to check its correct functioning and are destroyed immediately after being processed;
- to ascertain responsibility in the event of possible computer crimes against the GIANNESCHI S.R.L. site.

Data provided voluntarily by the user

The data acquired by **GIANNESCHI S.R.L.** with the optional, explicit and voluntary sending of emails to the addresses indicated on the **GIANNESCHI S.R.L.** site, as well as through the forms on specific pages of the **GIANNESCHI S.R.L.** will be processed only to the extent necessary in order to respond to any user requests.

The data acquired by **GIANNESCHI S.R.L.** with the optional, explicit and voluntary sending of curriculum vitae by aspiring collaborators, they will be processed only for the purpose of evaluating applications for possible hires and collaborations.

Specific summary information is reported or displayed on the pages of the **GIANNESCHI S.R.L.** site from which personal data are collected through forms, with details of the purposes of the processing.

The legal basis for the processing of the aforementioned data is the user's express consent, acquired in accordance with the RGPD.

# RECIPIENTS OF PERSONAL DATA

Navigation Data

The recipients of the navigation data are:

- \* employees and collaborators of GIANNESCHI S.R.L.;
- \* service providers related to the management and operation of the GIANNESCHI S.R.L. site

Data provided voluntarily by the user

The recipients of the data provided voluntarily by the user - as specifically detailed also in the individual disclosures will be the following subjects, indicated individually or by categories:

Your data sent through the form will be processed exclusively by:

- employees and collaborators of GIANNESCHI S.R.L,
- accounting and tax service companies, trade associations, tax-legal-technical-labor consultants, banking institutions,
- any other natural and / or legal persons who will be indicated by you for a "data interface" in your interest,
- specifically appointed data processors in writing,
- IT service providers:
- e-mail service provider:,
- service providers related to the management and operation of the Site;
- any employees in occasional maintenance and repair operations;
- cloud service providers (Dropbox, Google Drive)
- virtual server and hosting service;
- Providers connectivity and telephony service;
- Providers chat and communication service providers (ex: Skype, Whatsapp, GMail)
- file transfer service providers
- social network (attualmente Facebook, Instagram, Twitter)

The data will not be disclosed to other categories of subjects, nor will it be disseminated or made public in any way.

They may be communicated to the competent Authorities if required by current legislation or at the request of legitimate subjects.

# INTENTION TO TRANSFER DATA TO A THIRD COUNTRY OR AN INTERNATIONAL ORGANIZATION

The navigation data and the data sent spontaneously by users through the various channels made available by the **GIANNESCHI S.R.L.** may be transferred to servers located in non-EU countries, if the IT service providers and programs used by **GIANNESCHI S.R.L.**, previously listed as recipients, foresee it or use cloud computing technology that cannot locate with certainty where your given. In accordance with the law, it should be noted that at present the European Commission has provided for an adequacy decision only for a limited number of States (Andorra, Argentina, Australia, PNR, Canada, Faroe Islands, Guernsey, Isle of Man, Israel, Jersey, New Zealand, Switzerland, Uruguay) and that therefore your personal data may be transferred by the Services used (eg Skype, Gmail) even to countries for which such an adequacy decision has not been published, nor at present **GIANNESCHI S.R.L.** is able independently to provide appropriate guarantees.

However, we remind you that **GIANNESCHI S.R.L.** has carefully selected only service providers able to offer a high level of security and protection of personal data.

#### **DATA RETENTION PERIOD**

# Navigation Data

These data could be used to ascertain responsibility in case of hypothetical computer crimes against the site: except for this eventuality, the data are deleted immediately after processing.

#### Cookies

Cookies are stored for 12 (twelve) months, but only in aggregate form and do not allow users to be identified.

# Data provided voluntarily by the user

The data provided voluntarily by users by sending information request e-mails to the contacts on the **GIANNESCHI S.R.L.** they will be kept only for the time necessary to give feedback to the interested parties and will be subsequently destroyed.

The data provided voluntarily by users by sending e-mails to the contacts on the **GIANNESCHI S.R.L.** for the sending of CVs aimed at applying as collaborators, they will be kept only for the time necessary to give feedback to the interested parties and will subsequently be kept for 1 year to be able to consult them if the need arises to hire a new professional figure or start a new collaboration.

#### YOUR RIGHTS AS INTERESTED

We inform you that, as an interested party, you have all the rights you are entitled to under the RGPD: Right of Access (art. 15),

Right of Rectification (art. 16),

Right to be forbidden (art. 17),

Right of Resctricion of processing (art. 18),

Right to Data portability (art. 20),

Right of Opposition (art. 21).

You also have the right to revoke the consent given to the processing of data at any time, the revocation takes effect from the moment in which **GIANNESCHI S.R.L.** will become aware of it.

We remind you that the revocation, as required by the RGPD, does not affect the lawfulness of the treatment based on the consent previously given.

Finally, you have the right to lodge a complaint with a supervisory authority, as specified belowThe Italian Authority is the Guarantor for the Protection of Personal Data, whose contact details are accessible at the link http://www.garanteprivacy.it/web/guest/home/footer/contatti

n all the cases described, the exercise of your rights is brought to the attention of those to whom your data have been communicated, except for the cases of exemption provided for by the RGPD, referring to the reading of each content at the following link http://www.garanteprivacy.it/regolamentoue/diritti-degli-interessati.

In some cases (cancellation, limitation, opposition) the exercise of your rights may no longer make it possible, in whole or in part, to follow up on your requests made via e-mail or through the web form, nor the provision of any performance and / or services in your favor.

All the rights described are exercised with a request addressed without formalities or via email to the address <u>privacy@gianneschi.net</u> a **GIANNESCHI S.R.L.**, also through a person in charge, to whom appropriate feedback is provided without delay

#### RIGHT TO WITHDRAW CONSENT

The interested party always has the right to revoke his previously granted consent, in the same way he expressed it, or in any case by e-mail, by sending the revocation to the following address privacy@gianneschi.net.

The e-mail will have a receptive effect and therefore will allow upon receipt of the same to proceed with the interruption of any treatment and the communication to each manager or sub-manager to adapt to this effect.

We remind you that any revocation of consent does not affect the lawfulness of the processing based on consent before revocation.

#### RIGHT TO PROPOSE A COMPLAINT TO A SUPERVISORY AUTHORITY

Each interested party has the right, in the event of a violation to the detriment of their rights and freedoms, to proceed with the complaint to be made to the Guarantor via the web by completing the appropriate form, available on the website www.garanteprivacy.it

# OBLIGATORY AND NEED TO PROVIDE YOUR DATA

Apart from what is specified for navigation data, the user is free to optionally and voluntarily provide their identification and personal data.

Failure to provide the data requested by each page of the **GIANNESCHI S.R.L.** site, such as, but not limited to, name, surname, e-mail address, will make it impossible to obtain what is requested by the user.

#### **AUTOMATED PROFILING AND DECISION-MAKING PROCESSES**

Navigation Data

Your navigation data will not be used for profiling purposes or to activate automated decisionmaking processes Data provided voluntarily by the user

The data spontaneously and voluntarily provided by you through the e-mail addresses present on the **GIANNESCHI S.R.L.** and / or by filling in forms on specific pages of the **GIANNESCHI S.R.L.** they will not be used for profiling purposes or to activate automated decision-making processes.

#### **SECURITY MEASURES**

The Data Controller adopts adequate technical and organizational security measures, in accordance with the provisions of the RGPD in order to minimize the risks affecting your personal data, such as destruction or loss, even accidental, unauthorized access or processing. not allowed or not compliant with the collection purposes, as defined in this Privacy Policy.

#### METHOD OF TREATMENT

Data processing will be carried out in accordance with the provisions of art. 32 of the RGPD and will take place with the aid of IT and telematic means, as well as manuals and paper.

Following periodic checks, the Data Controller will verify the strict relevance and non-excess of the data collected with respect to the obligations and purposes of the processing.

# RULES OF CONDUCT - COMMUNICATION AND DISCLOSURE OF DATA

The Owner in order to comply with the provisions of current legislation, in the event that the User improperly uses the **GIANNESCHI S.R.L.** in order to commit offenses and / or engage in any criminally punishable conduct, it reserves the right to inform the Public Authority, in full compliance with the law.

### CHANGES TO THE PRIVACY POLICY

This Privacy Policy may be modified on the occasion of new features added to the **GIANNESCHI S.R.L.** or following comments and suggestions sent by our users.

The same Privacy Policy can be modified at any time with the publication of an updated version on the website, effective from the effective date of publication of the same.