# USER REGISTRATION PRIVACY POLICY

On this page **GIANNESCHI PUMPS AND BLOWERS S.R.L**. (hereinafter **GIANNESCHI S.R.L**.) describes the methods of processing your personal data sent using the form (the "Form") on the "Registration" page of **GIANNESCHI S.R.L**. accessible at the link www.gianneschi.net/it/user/register.

If you have any doubts, you can contact us at <a href="mailto:privacy@gianneschi.net">privacy@gianneschi.net</a>.

#### WHY THIS 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, including 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 those acquired through websites.

To find out more about the RGPD, you can consult the useful Section edited by the Italian Data Protection Authority: it will help you to better understand the new rules and to get to know your rights.

A fundamental principle is 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 communicated to third parties, etc ... and to be able to effectively control the management of their data.

This information is provided in accordance with Article 13 of the RGPD and is also inspired by the Article 29 Group Guidelines on Transparency.

The information is addressed to users who fill out the registration form to create a profile on the **GIANNESCHI S.R.** in order to access specific restricted areas. To complete the registration request **GIANNESCHI S.R.L.** will process your personal data that you will voluntarily send. Below you will find detailed information on how this data will be managed.

#### HOLDER OF THE TREATMENT AND CONTACTS

The Data Controller of your personal data is GIANNESCHI S.R.L., C.F. and VAT number 01619620469, accessible for any communication or request regarding such data at the following contacts: registered office Via Luigi Gianneschi, 270, 55041, Capezzano Pianore (LU); PEC gianneschisrl@cgn.legalmail.it; e-mail privacy@gianneschi.net for the provisions of Regulation 2016/679 and Legislative Decree 101/18.

#### TYPES OF DATA PROCEED

In addition to what is specified in the **Privacy Policy GIANNESCHI S.R.L.** for navigation data and e-mail messages, **GIANNESCHI S.R.L.** will request the sending of your personal contact data (name, surname, telephone number, e-mail address, residence address). In particular, the provision of your name and surname and e-mail address is a necessary requirement to respond to your request for registration of your personal profile.

# PURPOSE AND LEGAL BASIS OF THE PROCESSING

The data acquired by **GIANNESCHI S.R.L.**, through the Form, will be processed for the following purposes:

- a) create a personal account of the interested party for the use of content and services reserved for registered users;
- b) send commercial communications to the interested party's e-mail address.

The legal basis of the processing for the purposes referred to in lett. a) and b) is your consent expressed as an interested party, acquired in accordance with the RGPD.

# **RECIPIENTS OF PERSONAL DATA**

Your data sent through the form will be processed exclusively by

- \* employees and collaborators of **GIANNESCHI S.R.L.**;
- \* e-mail service providers;
- \* service providers related to the management and operation of the **GIANNESCHI S.R.L.** site;
- \* any employees involved in occasional maintenance and repair operations;
- \* cloud service providers;
- \* virtual server and hosting service providers;
- \* connectivity and telephony service providers;
- \* chat and communication service providers;
- \* service provider mailing lists;
- \* file transfer service providers;
- \* remote assistance service providers.

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 different 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 be located 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 could 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

The personal data you provide when completing the form will be kept for the time necessary to carry out the management activities of your personal account. Furthermore, such personal data will be kept until the exercise of your right to cancel the aforementioned data pursuant to art. 17 of the GDPR.

Your e-mail address, acquired and processed by **GIANNESCHI S.R.L.** for the management and sending of Communications, it will be kept for the entire duration of the registration.

When you decide to unsubscribe from Communications, your e-mail address will be automatically added to a black list of contacts that should no longer be used. This is an automatic procedure provided by the mailing list service provider.

# I SUOI DIRITTI COME INTERESSATO

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 Cancellation (so-called "Right to be forgotten) (art. 17);
- \* Right to limitation of processing (art. 18);
- \* Right to have the Data Controller notify the rectification or cancellation to the recipients (art. 19);
- \* 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 below. The Italian Authority is the Guarantor for the Protection of Personal Data, whose contact details are accessible at the link <a href="http://www.garanteprivacy.it/web/guest/home/footer/contatti">http://www.garanteprivacy.it/web/guest/home/footer/contatti</a>.

In 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 link <a href="http://www.garanteprivacy.it/regolamentoue/diritti-degli-interessati">http://www.garanteprivacy.it/regolamentoue/diritti-degli-interessati</a>

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 privacy@gianneschi.net to **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 <a href="mailto:privacy@gianneschi.net">privacy@gianneschi.net</a>.

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 <a href="https://www.garanteprivacy.it">www.garanteprivacy.it</a>

#### OBLIGATORY AND NEED TO PROVIDE YOUR DATA

The user is free to provide their personal data requested by the Form. However, your name and surname and e-mail address are required to be able to process your request.

Failure to provide the requested data, i.e. name / surname and e-mail address, will make it impossible to respond to your personal account registration request, as well as to send you commercial communications.

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

The data you spontaneously and voluntarily provide by filling in the form will not be used for profiling purposes, nor 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 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.

The data will be stored in electronic and paper archives in order to allow, where necessary, the identification and selection of aggregated data, for the time not exceeding the duration and the processing needs defined in the information provided to the collection of the data of the interested. 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

In order to comply with the provisions of current legislation, in the event that you improperly use the Form in order to commit offenses and / or engage in any criminal conduct, **GIANNESCHI S.R.L.** reserves the right to inform the Public Authority, in full compliance with the law.

# **CHANGES TO THE PRIVACY POLICY**

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

The same information can be changed at any time with the publication of an updated version on the Registration page of the **GIANNESCHI S.R.L.** effective from the effective date of its publication. If this Notice changes during the period in which we are in contact with you, we will duly inform you.

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