

# INFORMATION NOTICE ON DATA PROTECTION

## DATA CONTROLLER

Rhiag S.r.l., with registered office in Bergamo, Via Tiraboschi 48, Italy, and administrative offices in Pero (Milan), Via Monti 23/D, with tax code 02394560136 and VAT number 12645900155, registered with the Bergamo Register of Companies R.E.A. 378581 (hereinafter also "Company").

## 1 – PROCESSING PURPOSES

**1.1 – Contractual purposes:** to visualize the web pages and to use the services, included the sale of products, offered inside the site [www.rhiag.com](http://www.rhiag.com) ("Site")

**1.2 – Marketing Purposes:** sending, by automated contact methods (such as SMS, MMS and e-mail) and traditional ones (such as telephone calls with operator and traditional mail), promotional and commercial communications relating to services / products offered by the Company or reporting of corporate events, as well as carrying out market studies and statistical analysis.

**1.3 – Profiling purposes:** analysis of your preferences, habits, behaviours or interests in order to send you personalized commercial communications.

**1.4 – Obligations of the law:** to comply with obligations laid down in regulations and applicable national and supranational legislation.

**1.5 – Newsletters service:** if requested by you by registering for this service.

**1.6 – Rights of the Data Controller:** if necessary, to ascertain, exercise or defend the rights of the Company in court.

**1.7 – Extrajudicial debt recovery:** in order to allow the Company to recover its debts without recourse to a judicial authority.

**1.8 – Website functionalities:** the computer systems and software procedures used to operate the Website acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols. This information is not collected in order to be associated with identified interested parties, but, by their own nature, could, through processing and association with data held by the Company or third parties, allow the identification of users of the Site.

## 2 - LEGAL BASES FOR PROCESSING

**2.1 - Contractual purposea:** execution of a contract to which you are a party..

**2.2 - Marketing e profiling purposes:** consent (optional and revocable at any time).

**2.3 - Legal obligations:** need to comply with legal obligations.

**2.4 - Newsletters:** execution of a contract to which you are a party (newsletter's service)

**2.5 - Rights of the Data Controller and Extrajudicial debt recovery:** legitimate interest.

## 3 – DATA RETENTION

**3.1 - Contractual purposes, legal obligations and newsletters:** for the entire duration of the contract and, after termination, for 10 years.

**3.2 - Marketing e profiling purposes:** until the revocation of consent for this purpose. The only data relating to the details of any purchases made will be kept and processed for the terms provided by the provision of the Authority for the protection of personal data of 24 February 2005 and subsequent amendments, or 24 months.

**3.3 – Rights of the Data Controller for extrajudicial credit recovery:** in the case of judicial litigation, for the entire duration of the same, until the exhaustion of the terms of expedition of the appeals.

**3.4 – Rights of the Data Controller and extrajudicial debt recovery:** in the case of litigation, for the entire duration of the dispute, until the time limits for the appeal proceedings have been exhausted.

Once the above mentioned storage terms have expired, your personal data will be destroyed, deleted or made anonymous, compatibly with the technical procedures of cancellation and backup.

#### **4.1 - PERSONAL DATA PROCESSED FOR CONTRACTUAL PURPOSES - LEGAL OBLIGATIONS - RIGHTS OF THE CONTROLLER - CREDIT RECOVERY**

Anagraphic data, contact data, administrative-accounting data.

#### **4.2 – PERSONAL DATA PROCESSED FOR MARKETING AND PROFILING PURPOSE**

Anagraphic data, contact data, administrative-accounting data, data of purchases made on the Site, data collected by cookies installed by the Site.

#### **4.3 - PERSONAL DATA PROCESSED FOR NEWSLETTERS**

Contact data.

#### **4.4 - PERSONAL DATA PROCESSED FOR FUNCTIONALITIES OF THE SITE**

The IP addresses or domain names of the computers used by the users who connect to the Site, the URI (Uniform Resource Identifier) addresses of the resources requested, the time of the request, the method used to submit 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.), other parameters relating to the operating system and the user's computer environment, information relating to the user's behaviour on the Site, to the pages that have been visited or searched for, in order to select and make specific announcements to the user of the Site and data relating to the navigation behaviour on the Site using, for example, cookies.

### **5 – BINDING OF DATA PROCESSING**

The provision of personal data as per point 4.1 for the purposes referred to in point 1.1 is mandatory. The refusal to provide such personal data does not allow, therefore, the possibility of using the services of the Site relating to the booking and sale of products.

The provision of personal data as per point 4.2 for the purposes referred to in points 1.2 and 1.3 is optional and subject to your consent.

Some personal data referred to in point 4.4 are strictly necessary for the operation of the Site, others are used only to obtain anonymous statistical information on the use of the Site and to check its proper functioning, and are deleted immediately after processing. In the processing of personal data that may, directly or indirectly, identify you, we try to respect a principle of strict necessity. For this reason, we have configured the Site in such a way that the use of personal data is reduced to a minimum and in such a way as to limit the processing of personal data that allow us to identify you only when necessary or at the request of the authorities and the police (such as, for example, for data relating to traffic and your stay on the Site or your IP address) or to ascertain liability in the event of hypothetical computer crimes against the Site.

### **6 - DATA RECIPIENTS**

The data may be processed by external subjects operating as independent owners such as, for example, authorities and supervisory and control bodies and in general subjects, public or private, entitled to request data.

The data may also be processed, on behalf of the Company, by external subjects designated as managers, to whom adequate operating instructions are given. These subjects are essentially included in the following categories:

- a. companies that offer e-mail sending services;
- b. companies that offer services for the maintenance and development of the Site;
- c. companies that offer support in carrying out market studies.

### **7 - SUBJECTS AUTHORIZED TO DATA PROCESSING**

Your data may be processed by employees of the Company's corporate functions responsible for pursuing the purposes indicated above, who have been expressly authorized to process and who have received adequate operating instructions.

The data referred to in point 4.4 collected while browsing the Site will be processed by employees, collaborators of the Company or external parties, as persons in charge and data processors, who perform on behalf of the Company tasks of a technical and organizational Site.

A complete and updated list of the data processors appointed by the Company can be obtained by writing via email to [Privacy@rhiag-group.com](mailto:Privacy@rhiag-group.com)

#### **8 RIGHTS OF THE DATA SUBJECT - COMPLAINTS TO THE DATA PROTECTION AUTHORITY**

By contacting the Company by e-mail at [Privacy@rhiag-group.com](mailto:Privacy@rhiag-group.com), you may ask the Company for access to the data concerning you, their deletion, rectification of inaccurate data, integration of incomplete data, limitation of processing in the cases provided for in art. 18 of the GDPR, as well as opposition to processing in cases of legitimate interest of the Company.

Furthermore, if the processing is based on consent or contract and is carried out with automated tools, you have the right to receive in a structured format, commonly used and readable by automatic device, your personal data, and if technically feasible, to transmit them to another holder without hindrance.

You have the right to revoke your consent at any time for marketing and/or profiling purposes, and to object to the processing of data for marketing purposes, including profiling related to direct marketing. The possibility remains that you prefer to be contacted for this purpose exclusively by traditional methods, to express your opposition only to the receipt of communications by automated methods.

You have the right to lodge a complaint with the competent supervisory authority in the Member State where you are normally resident or working or in the Member State where the alleged infringement occurred.

#### **9 – DATA SECURITY**

Your personal data will be processed by automated tools for the time strictly necessary to achieve the purposes for which they were collected and in accordance with the principle of necessity and proportionality, avoiding processing personal data if the operations can be achieved through the use of anonymous data or by other means.

We have adopted specific security measures to prevent the loss of personal data, illicit or incorrect use and unauthorized access, but please do not forget that it is essential for the security of your data that your device is equipped with tools such as antivirus constantly updated and that the provider that provides you with the connection to the Internet ensures the secure transmission of data through firewalls, spam filters and similar safeguards.