

PRIVACY POLICY

Welcome to the website of Erretrade Srl, Data Controller, with registered office in Via Primo Villa 8/10, 20040 Burago di Molgora, Milan, email: info@erretrade.it.

In order to ensure maximum compliance with the law, Legislative Decree. 30 June 2003 n. 196 and of the EU Regulation 2016/679, our company has given itself a specific organization by adopting a suitable Model of Organizational Privacy.

The Code and the Regulation in question provide that those who carry out processing of personal data are required to inform the person concerned, on what data are processed and on certain elements qualifying treatment: it must be lawfully and transparently correct, protecting your privacy and your rights. In compliance with the provisions of Article 13 of Legislative Decree 196/2003 and Articles 13 and 14 of EU Regulation 2016/679, We provide the following information distinguishing between:

- **Website Users**
- **Customers and Suppliers**
- **Candidates for recruitment**

The undersigned Organization reserves the right to modify this Privacy Policy at any time: we invite you, therefore, to come back to this page frequently in order to check for any changes. Use of the Site and our Services implies acceptance of our Privacy Policy, as it is updated from time to time.

Your rights and the Data Processors

First of all, we remind you that, pursuant to art. 7 of the Legislative Decree 196/2003 and Articles from 15 to 22 of EU Regulation 2016/679 is your right, among other things, to know your personal data processed by us and to request its integration, correction or cancellation. Your person, as Interested in processing, has the right to obtain from Erretrade Srl, the data controller, the confirmation that it is or is not undergoing the processing of personal data concerning it and, in this case, to obtain access to the data personal data and the following information:

- a. The purposes of the processing;
- b. the categories of personal data in question;
- c. the recipients or categories of recipients to whom the personal data have been or will be communicated, in particular if recipients of third countries or international organizations;
- d. whenever possible, the retention period of the personal data provided or, if not possible, the criteria used to determine this period;

The interested party also has the right to:

- a. to obtain from the data controller the correction of inaccurate personal data concerning him without undue delay. Taking into account the purposes of the processing, the data subject has the right to obtain the integration of incomplete personal data, also by providing an additional declaration;
- b. to obtain from the data controller the deletion of personal data concerning him without undue delay and the data controller is obliged to cancel the personal data without undue delay if there is one of the following reasons:
 - i. the personal data are no longer necessary with respect to the purposes for which they were collected or otherwise processed;
 - ii. the interested party revokes the consent on which the processing is based and if there is no other legal basis for the processing;
 - iii. the interested party opposes the processing and there is no legitimate overriding reason to proceed with the processing;
 - iv. personal data have been processed unlawfully;
 - v. personal data must be deleted to fulfill a legal obligation under Union or Member State law to which the data controller is subject.
- c. propose a claim to the Guarantor for the protection of personal data or to the supervisory authority of the place where the alleged violation has occurred, in case it considers that the processing that concerns it violates the privacy legislation of reference;
- d. obtain, if data are not collected from the data subject, all available information on their origin;
- e. obtain information on the existence of an automated decision-making process, including profiling, and, at least in such cases, significant information on the logic used, as well as the importance and expected consequences of such processing for the data subject;
- f. be informed of the existence of adequate safeguards related to the transfer, if the personal data are transferred to a third country or to an international organization;
- g. obtain from the data controller the limitation of processing when one of the following hypotheses occurs:
 - i. the interested party disputes the accuracy of personal data for the period necessary for the data controller to verify the accuracy of such personal data;
 - ii. the processing is illegal and the interested party opposes the cancellation of personal data and asks instead that its use is limited;
 - iii. although the data controller no longer needs it for processing purposes, personal data are necessary for the data subject to ascertain, exercise or defend a right in court;
 - iv. the interested party opposed the processing pending verification of the possible prevalence of the legitimate reasons of the data controller with respect to those of the interested party.
- h. receive, in a structured format, in common and automatic device-readable form, personal data concerning him / her provided to a data controller and transmit this data to another data controller without impediments by the data controller who provided them if:
 - i. the treatment is based on consent or on a contract; and
 - ii. the treatment is carried out by automated means.

In exercising its rights with regard to data portability, the data subject has the right to obtain direct transmission of personal data from one controller to another, if technically feasible.

- i. to oppose at any time, for reasons connected to your particular situation, to the processing of personal data concerning him / her within the terms and limits of the reference privacy legislation, including profiling on the basis of these provisions. The data controller refrains from further processing personal data unless he demonstrates the existence of binding legitimate reasons to proceed with the processing that prevail over the interests, rights and freedoms of the data subject or for the assessment, exercise or the defense of a right in court;
- j. if personal data are processed for direct marketing purposes, oppose at any time the processing of personal data concerning him for such purposes, including profiling in so far as it is related to such direct marketing. If the data subject objects to processing for direct marketing purposes, personal data are no longer processed for these purposes;
- k. if personal data are processed for scientific or historical research purposes or for statistical purposes, object to the processing of personal data concerning him for reasons related to his particular situation, unless the processing is necessary for the performance of a task in the public interest ;
- l. not be subjected to a decision based solely on automated processing, including profiling, which produces legal effects affecting him or which significantly affects his person. This right does not apply in the event that the decision:
 - i. is necessary for the conclusion or execution of a contract between the data subject and a data controller;
 - ii. is authorized by the law of the Union or of the Member State to which the controller is subject, which also specifies appropriate measures to protect the rights, freedoms and legitimate interests of the data subject;
 - iii. is based on the explicit consent of the person concerned.

The data controller provides a copy of the personal data being processed. In the event of further copies requested by the data subject, the data controller may charge a reasonable fee contribution based on administrative costs. If the interested party submits the request by electronic means, and unless otherwise indicated by the interested party, the information is provided in a commonly used electronic format. The data controller shall inform each of the recipients to whom the personal data have been transmitted of any corrections or cancellations or limitations on the processing performed, unless this proves impossible or involves a disproportionate effort. The data controller informs the recipient of these recipients if the data subject requests it. To exercise these rights, contact the Data Controller at the email address info@erretrade.it, postal address at the headquarters of our organization. The complete list of all the Managers for the processing of personal data, named by us, can be found by contacting the Data Controller.

USER INFORMATION WEBSITE

This page describes how to manage the site in relation to the processing of personal data of users who consult it. The treatment is always based on principles of lawfulness and fairness in compliance with all current regulations.

This privacy policy is also given as Information pursuant to art. 13 of Legislative Decree no. 196/03 (Italian law on the processing of personal data in compliance with Directive 95-46-CE) to those who interact with the web services of this site, for the protection of personal data, accessible by telematics starting from the address www.erretrade.it corresponding to the homepage of the official website of Erretrade Srl. The information is provided only for the site of Erretrade Srl and not for other websites that may be consulted by the user through links.

They are independent data controllers and therefore refer to the sites in question. The information is also inspired by the Recommendation n. 2/2001 that the European authorities for the protection of personal data, gathered in the Group established by the art. 29 of the directive n. 95/46 / CE, adopted on May 17, 2001 to identify some minimum requirements for the collection of personal data online and, in particular, the methods, timing and nature of the information that the Data Controllers must provide to users when they link to web pages, regardless of the purpose of the link. The processing of data you have freely given will be carried out in compliance with the regulations in force. In particular, the treatment will be based on principles of correctness, lawfulness and transparency; relevance, completeness and non-excess; the data will be collected and recorded for the purposes referred to in the following point and kept for a period strictly necessary for the purposes.

Types of data processed, methods of processing, purpose of processing, optional or not. **Navigation data**

The computer systems and software procedures used to operate this website acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols. This is information that is not collected to be associated with identified interested parties, but which by their very nature could, through processing and association with data held by third parties, allow users to be identified. This category of data includes IP addresses or domain names of the computers used by users connecting to the site, the addresses in the Uniform Resource Identifier (URI) notation of the requested resources, 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 (success, error, etc.) and other parameters relating to the operating system and the user's computer environment. These data are used for the sole purpose of obtaining anonymous statistical information on the use of the site and to check its correct functioning, and are deleted immediately after processing. The data could be used to ascertain responsibility in case of hypothetical computer crimes against the site.

Data provided voluntarily by the user

The optional, explicit and voluntary sending of e-mails to the addresses indicated on this website entails the subsequent acquisition of the sender's address and of the personal data necessary to respond to requests and / or provide the requested services, as well as any other personal data entered in the letter (and in the attachments to it) or in the appropriate forms. The e-mails received are archived indefinitely on a server protected by appropriate security measures. The interested party can exercise all the rights foreseen by the art. 7 D.Lgs. 196/2003 reported in opening this Privacy Policy, in particular can know what its data are present in the archive and obtain the cancellation, by writing to our Organization at the following email address info@erretrade.it. The data will therefore be processed electronically and in order to respond to requests and / or provide the requested service. The conferment is always optional and failure to provide only entails the impossibility of following up the requests. Your data may be communicated to us (with this term meaning to give it knowledge to one or more specific subjects) to subjects who can access the data by virtue of the provision of law, regulation or community legislation, within the limits set by these rules , as well as to subjects who need access to their data for purposes that are ancillary to the relationship between you and us, within the limits strictly necessary to carry out auxiliary tasks (credit institutions are mentioned as an indication).

Cookies

No personal data of users is acquired by the site in this regard. We do not use cookies to

transmit information of a personal nature, nor are used c.d. persistent cookies of any kind, or systems for tracking users. The use of c.d. 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 site. I c.d. session cookies used on this site avoid the use of other technologies that could compromise the privacy of users' browsing and do not allow the acquisition of personal identification data.

Place of data processing and scope of communication or dissemination.

The data related to the web services of this site are processed by the service provider, within the strictly necessary limits to provide the hosting service, at the headquarters of our organization only by technical personnel in charge of processing or by persons in charge of occasional maintenance operations.

Your rights with the respective methods of exercise are shown at the beginning of this Privacy Policy.

CUSTOMER AND SUPPLIER INFORMATION

Nature of the data processed

Erretrade Srl treats your personal and fiscal data, as well as other personal data of a common nature necessary for the performance of existing or future contractual relationships with our company.

Purpose of the treatment

Your data are processed in relation to the contractual requirements, and to the consequent fulfillment of legal and fiscal obligations, as well as to allow an efficient management of financial and commercial relationships.

The data will be processed for the entire duration of the contractual relationship and also subsequently, for the fulfillment of legal obligations and for administrative and commercial purposes.

Method of treatment

The processing of data takes place through the use of tools and procedures suitable to ensure the security and confidentiality and can be carried out either by paper or through the use of information technology. Obligation or power to provide data With regard to the data that we are obliged to know, in order to comply with the obligations established by law, regulations and Community legislation, or provisions issued by Authorities legitimated by law and by supervisory and control bodies, their failure conferment by you implies the impossibility to establish or continue the relationship, in the limits in which such data are necessary for the execution of the same. As for the data that we are not obliged to know, their failure to obtain will be assessed by us from time to time, and will determine the resulting decisions, related to the importance for our organization of the data requested and not conferred. Scope of knowledge and communication of your data The data may be disclosed, as managers or persons in charge of processing, appointed by the undersigned organization, exclusively managers, administrators, accounting officers, administration, operational management, external consultants. Your data may be communicated by us (with this term meaning to give it information to one or more specific subjects) to subjects who can access the data by virtue of the provision of law, regulation or community legislation, within the limits set by these rules , as well as to subjects who need access to your data for auxiliary purposes to the relationship between you and us, within the limits strictly necessary to perform the auxiliary tasks. The transfer of information that also concerns you temporarily to a country outside the European

Union can only take place if necessary for the performance of obligations arising from a contract of which you are a part or to fulfill, before the conclusion of the contract, specific Your requests, or for the conclusion or execution of a contract concluded in your favor.

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INFORMATION FOR CANDIDATES FOR THE ASSUMPTION

Erretrade Srl carries out the personnel selection activity pursuing the equality between workers and workers and not discriminating against candidates of one or the other sex, in compliance with Laws 903/77 and 125/91. Your data will also be processed and stored with the utmost confidentiality, care and diligence in compliance with the provisions of Legislative Decree 196/2003 and according to the procedures set out below.

Purpose of the treatment

The processing of personal data is carried out exclusively as part of the research, selection and evaluation of personnel.

Collection and nature of data

For the purposes mentioned above, within the data subject of processing, in addition to those of a common nature, there may be some that, pursuant to Article 4 letter d) Legislative Decree 196/2003, are of a sensitive nature. Sensitive data will be processed in compliance with the authorization No. 1/2016 Guarantor Privacy and only after formal consent. Data collection takes place through the sending, on the part of the interested parties, of their Curriculum Vitae and by filling in at the headquarters of the undersigned Organization of a specific Information Questionnaire. The collection can take place either electronically (email or attachment to specific forms) or paper.

Mandatory or optional nature of the contribution

The provision of personal data by the interested party and the sending of their Curriculum Vitae are optional: in the absence, however, we will not be able to carry out the research, selection and evaluation of personnel.

Scope of communication or dissemination of data

They may become aware of your data in charge or in charge of processing designated by our company. Your data may also be disclosed to third parties who provide specific services or perform related activities, instrumental or support the methods and purposes for which your data were supplied by you.

Methods of processing and storage of data

The processing of data will take place in accordance with the provisions of art. 11 of Legislative Decree n. 196/2003. The processing of data will always take place with logic strictly related to the purposes indicated and with procedures that guarantee the security and confidentiality of the data themselves, through the adoption of appropriate measures to prevent the alteration, deletion, destruction, access not authorized or the treatment not allowed or not in accordance with the purpose of the collection. The data will be stored in our archives and / or databases for a period of time not exceeding 3 months.

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