

Latest update: 30/09/2020

**DATA PROTECTION INFORMATION IN COMPLIANCE WITH ART. 13 of the EUR GDPR 2016/679
about the data processed through this website**

For us, data protection is a very serious topic, so we would like to inform you about the way in which the data is processed and the rights that you can exercise under current data protection legislation, in particular EU Regulation 2016/679 (hereinafter also: "GDPR").

Who is the Data Controller? And where can I contact him?

Fondinox S.p.A.

Registered Office: Via Ferrante Aporti, 18,
20125 - Milan (MI)

Operating factory Via Marconi, 42/48,
26010 - Sergnano (CR)

E-mail address: privacy@fondinox.com

2. Purposes covered by the consent of the Data Subject (Art. 6, paragraph 1 (a) of the GDPR)

Personal data may also be processed for certain purposes for which the Data Subject gave his consent.

a. Respond to requests or questions submitted and sent to the contacts indicated on this site, to receive information about our products and services, as well as sending quotes and requesting assistance.

The retention period of personal data, in relation to the purposes set out in this section is:

For the purpose: until the request is processed.

3. The categories of processed data

The data processed by the Data Controller is exclusively "personal data" (according to Article 4.1 of the GDPR).

In particular, the relevant categories of personal data can be, by way of example but certainly not exhaustive:

- Personal and identification data (by way of example but not limited to name, surname, etc.).
- Contact data (address, email address, IP address, telephone number and similar data).
- Data relating to any services provided.

4. Recipients or categories of recipients of personal data (pursuant to art. 13 paragraph 1 (e) of the GDPR) *

As part of the aforementioned purposes, the Data Controller may communicate your data to:

- Offices and internal functions of the Controller.
- Companies and professional operators that provide IT services, including electronic data processing, software management, site management and IT consulting.

** The complete and updated list of Data Controllers, Managers, Recipients (pursuant to art. 4.9 of the GDPR), is made available at the offices of the Data Controller.*

5. Recipients or categories of recipients of personal data (pursuant to art. 13 paragraph 1 (f) of the GDPR)**

The Data Controller informs you that it does not intend to transfer your data to countries not included in the EU and the EEA for the aforementioned purposes.

*** The complete and updated list of Data Controllers, Managers, Recipients (pursuant to art. 4.9 of the GDPR), is made available at the offices of the Data Controller.*

6. Data Subject rights

The Data Subject, in relation to the personal data covered by this policy, has the right to exercise the rights provided for by the EU Regulation below:

- Right to access by the Data Subject [art. 15 of the EU Regulation] (consisting in the possibility of being informed about the processing carried out on their personal data and possibly receiving a copy).
- Right to rectification of personal data [art. 16 of the EU Regulation] (the Data Subject has the right to rectification of incorrect personal data concerning him/her).
- Right to erasure of data without undue delay ('right to be forgotten') [art. 17 of the EU Regulation] (the Data Subject has, as he or she will have, the right to erase his or her data);
- Right to restriction of processing of your personal data in the cases provided for by art. 18 of the EU Regulation,

including in the case of unlawful processing or challenge of the accuracy of personal data by the Data Subject [art. 18 of the EU Regulation];

- Right to data portability [art. 20 of the EU Regulation], (the Data Subject may request their personal data in a structured format in order to transmit them to another Data Controller, in the cases provided for in the same article);
- Right to object to the processing of his/her personal data [art. 21 of the EU Regulation] (the Data Subject has, as he/she will have, the right to object to the processing of his/her personal data in the cases provided for and regulated by art. 21 of the EU Regulation);
- Right not to be subject to automated decision-making [art. 22 of the EU Regulation] (the Data Subject has, as he or she will have, the right not to be subject to a decision based solely on automated processing).

With regard to the purposes for which consent is required, the Data Subject may withdraw his/her consent at any time and the effects will take effect from the moment of withdrawal, subject to the terms provided for by law. In general terms, revocation of consent shall only take effect for the future.

The aforementioned rights can be exercised as established by the EU Regulation by sending an email to privacy@fondinox.com or to the addresses indicated in point 1.

Fondinox S.p.A., in compliance with art. 19 of the EU Regulation, proceeds to notify the recipients who the personal data have been communicated to of any corrections, deletions or limitations of the processing requested, where this is possible.

7. Right to lodge a complaint (art. 13 paragraph 2 (d) of the GDPR)

The Data Subject, if he/she believes that his/her rights were compromised, is entitled to lodge a complaint to the Supervisory Authority.

For more information on the rights and the exercise of the same, please refer to:

<http://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/4535524> or by sending written communication to the Guarantor Authority for the Protection of Personal Data, Piazza Monte Citorio n.121, 00186 Rome.

8. Possible consequence of failure to communicate data and nature of granting data (art. 13 paragraph 2 (e) of the GDPR)

8.1 In case of fulfilment of any legal or contractual obligations

Please note that if the processing purposes have as their legal basis a legal or contractual (or even pre-contractual) obligation, the Data Subject must necessarily provide the requested data.

Otherwise, it will be impossible for the Data Controller to proceed with the pursuit of the specific processing purposes.

8.2 In case of consent of the Data Subject

With regard to the purposes for which consent is required, the Data Subject may withdraw his/her consent at any time and the effects will take effect from the moment of withdrawal, subject to the terms provided for by law. In general terms, revocation of consent shall only take effect for the future. Therefore, the processing that was carried out prior to revocation of consent will not take effect and will maintain its legitimacy.

Failure or partial consent may not guarantee the complete provision of services, with reference to the individual purposes for which consent is denied.

It should be noted that with reference to the request for information, although the free and optional consent to the processing of personal data remains, it is necessary for the fulfilment of the request. Therefore, sending the request or equivalent expression of will is to be considered as granting consent, which will always be revocable with the consequences illustrated above.

When the data is no longer needed, it is regularly deleted, if its deletion is impossible or possible only due to a disproportionate effort due to a particular storage method, the data cannot be processed and must be stored in inaccessible areas.

9. Existence of an automated decision-making process (profiling included)

The use of purely automated decision-making processes as detailed in Article 22 of the GDPR is currently excluded. If in the future it is decided to establish such processes for individual cases, the Data Subject will receive separate notification if required by law or updating of this policy.

10. Treatment modes

Personal data will be processed on hard paper, IT and telematics and stored in the relevant databases (potential customers, customers, users, etc.) to which the employees expressly designated by the Data Controller as Data Controllers and Authorised Data Processors will be able to access, use, process, compare and any other appropriate operation, including automated, in compliance with the legal provisions necessary to guarantee, among other things, the confidentiality and security of the data as well as the accuracy, updating and relevance of the data with respect to the stated purposes.

Data processing useful for navigation

The IT systems and software procedures enforced for the present web site operation acquire, during their standard operation, some personal data whose transmission is included in the use of the internet communication protocol use.

This is information which is not collected to be associated to identified people, but for its nature it could through processing and associations with data held by third parties, allows to identify the user.

Among the information that can be collected there are the IP addresses, the type of browser or operating system used, URI notation addresses (uniform resource identifier), the domain name and the addresses of the websites from which the access or exit was made (referring/exit pages), the time in which the request was made to the server, the method used and information on the answer obtained, further information on the user's navigation on the site (see also the section relating to cookies) and other parameters relating to the operating system and the user IT environment.

The data could be used to ascertain any liability in case of possible IT crimes against the website.

Use of cookies

The following information is provided to the user in implementation of the provision of the Guarantor for the Protection of Personal Data of May 8, 2014 "*Identification of simplified procedures for the information and acquisition of consent for the use of cookies*".

WHAT ARE THE COOKIES?

Cookies are small text strings that a website can send, while browsing, to your device (whether it is a PC, a notebook, a smartphone, a tablet; they are usually stored directly on the browser used for browsing). The same website that transmitted them, can then read, and record the cookies that are on the same device to obtain various types of information. What kind? For each type of cookie there is a well-defined role.

HOW MANY TYPES OF COOKIES ARE THERE?

There are two fundamental macro-categories, with different characteristics: technical cookies and profiling cookies.

Technical cookies are generally necessary for the correct functioning of the website and to allow navigation; without them you may not be able to view the pages correctly or to use some services. For example, a technical cookie is essential to keep the user logged in throughout the visit to a website, or to store language settings, display settings, and so on. Technical cookies can be further distinguished in:

- Browsing cookies, which provide for the normal navigation and use of the website (allowing, for example, to make a purchase or authenticate to access restricted areas).
- Analytics cookies, assimilated to technical cookies only where used directly by the site manager to collect information, in aggregate form, on the number of users and how they visit the site itself.
- Functionality cookies, which allow the user to browse according to a set of selected criteria (for example, language, products selected for purchase) to improve service.

Profiling cookies are more sophisticated! These cookies are designed to profile the user and are used to send messages in line with the user preferences.

Cookies can still be classified as:

- Session cookies, which are deleted immediately when the browser is closed.
- Persistent cookies, which - unlike session cookies - remain within the browser for a certain period. They are used, for example, to recognize the device that connects to the site facilitating authentication operations for the user.
- First-party cookies, i.e. cookies generated and managed directly by the operator of the website on which the user is browsing.
- Third-party cookies, which are generated and managed by subjects other than the operator of the website on which the user is browsing (as a rule, under a contract between the owner of the website and the third party).

WHAT COOKIES do Fondinox S.p.A. USE?

THIRD PARTY COOKIES

I A) TECHNICAL COOKIES

Among these technical cookies, described above, it is essential to point out the essential cookies or browsing cookies, which enable functions, without which it would not be possible to make full use of the Site.

These cookies are first party cookies. The essential cookies cannot be disabled using the website

Also included in the technical cookies are the functionality cookies mentioned above and the so-called “analytics”, which are statistical only and collect aggregated information without identifying any single user.

The prior consent of users is not required for the installation of these cookies. These cookies can be deactivated and/or deleted through browser settings (see below).

In case of blocking the use of cookies, the service offered to the User through the Site will be limited, thus affecting the experience of using the Site itself.

Below, for each technical cookie used we report: the name, purpose of use and storage times.

Functional cookies

Cookie name	Scope	Duration;
wp-wpml_current_language	This cookie is installed by WPML to store language settings.	1 day

Analytics cookies

Cookie name	Scope	Duration;
_ga	This cookie is installed by Google Analytics. The cookie is used to calculate visitor data, sessions, campaigns and keep track of the use of the site for the site analysis report. Cookies store information anonymously and assign a randomly generated number to identify unique visitors.	2 years
_gat_gtag_UA_48388981_1	Google uses this cookie to distinguish users.	1 minutes
_gid	This cookie is installed by Google Analytics. The cookie is used to store information about how visitors use a website and helps to create an analytical report on how the website is going. The data collected includes the number of visitors, the source from which they came, and the pages displayed anonymously.	1 day

DISCLAIMER BY GOOGLE ANALYTICS

This website also uses Google Analytics, a web analysis service provided by Google Ireland Limited, Gordon House, 4 Barrow St, Dublin, D04 E5W5, Ireland (“Google”). Google Analytics uses cookies, which are text files stored on your computer to allow the website to analyse the information generated by the cookie about your use of the website (including your IP address). Google will never match an IT address to any data it controls. You can refuse the use of cookies by selecting the appropriate setting on your browser. However, note that if you do this, you may not be able to use all the features of this Web site. You can also prevent the collection and use of data (cookies and IP address) by Google by downloading and installing the browser plug-in available at <https://tools.google.com/dlpage/gaoptout?>. More information on terms and conditions of use and data privacy can be found at <https://www.google.com/analytics/terms/>

Click [here](#) for an overview of Google's privacy, to choose not to be tracked by Google Analytics on all websites visited:

<https://tools.google.com/dlpage/gaoptout>

Alternatively, to the Browser Plugin or when browsing on mobile devices, you can disable Google Analytics by clicking the link below. An exclusion cookie is set on your computer preventing future data collection during your visit to this website (this exclusion cookie will only work within this browser on your device. If you delete cookies on your device but want to continue blocking the monitoring of this website, you must click the link again).

Finally, below are the links to the most popular browsers, where there is information about how to disable the storage or delete cookies already stored on the browser:

- [Internet Explorer](#)
- [Google Chrome](#)
- [Mozilla Firefox](#)
- [Apple Safari](#)

Notice concerning people under the age of 14

Children under 14 years of age may not provide personal data. Fondinox S.p.A. will not be in any way responsible for any collection of personal data, as well as false statements, provided by the minor, and in any case, if its use is detected, Fondinox S.p.A. will facilitate the right of access and erasure forwarded by the legal guardian or by those exercising parental responsibility.

Exercise of the Data Subject rights

The Data Subject, in relation to the personal data covered by this policy, has the right to exercise the rights provided for by the EU Regulation below:

- **Right of access by the Data Subject [art. 15 of the EU Regulation]:**
- the Data Subject shall have the right to obtain from the Data Controller confirmation as to whether or not personal data concerning him or her is being processed and, where that is the case, access to the information expressly provided for in the aforementioned article, including, but not limited to, the purposes of the processing, the categories of personal data and recipients concerned, the envisaged period for which the personal data will be stored, the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the Data Subject or to object to such processing, the right to lodge a complaint, when the personal data is not collected from the Data Subject, any available information on its source, the possible existence of an automated decision-making process pursuant to art. 22 of the Regulation, as well as a copy of his or her personal data.
- **Right to rectification [art. 16 of the EU Regulation]:** The Data Subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data and to have incomplete personal data completed, including by means of providing a supplementary statement.
- **Right to erasure (“right to be forgotten”) [art. 17 of the EU Regulation]:** The Data Subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay, if there is one of the reasons expressly provided for in the aforementioned article, including, but not limited to, the loss of the need for processing with respect to the scope, the withdrawal of the consent on which the processing is based, opposition to the processing in the case where it is based on a legitimate non-prevailing interest, unlawful processing of data, erasure for legal obligations, data of minors processed in the absence of the conditions of applicability provided for by art. 8 of the Regulation;
- **Right to restriction of processing [art. 18 of the EU Regulation]:** In the cases provided for by art. 18, including unlawful processing, challenge of data accuracy, opposition of the Data Subject and the loss of the need for processing by the Data Controller, the Data Subject data must be processed only for storage without the consent of the same and the other cases expressly provided for by the aforementioned article;
- **Right to data portability [art. 20 of the EU Regulation]:** the Data Subject, in cases where the processing is based on consent and the contract and is carried out by automated means, may request to receive the personal data concerning him or her, in a structured, commonly used and machine-readable format, and has the right to transmit those data to another controller;
- **Right to object [art. 21 of the EU Regulation]:** the Data Subject has the right to object to the processing of personal data concerning him or her, in the case where the processing is based on a legitimate non-prevailing interest or is carried out for direct marketing purposes;
- **The right not to be subject to automated decision-making [art. 22 of the EU Regulation]:** the Data Subject has the right not to be subject to a decision based solely on automated processing, including profiling (for example carried out exclusively through electronic tools or computer programs).

The above statement do not replace the text of the articles mentioned herein which are referred to in full and to whose full reading reference is made

Right to lodge a complaint

The Data Subject, if he/she believes that his/her rights have been compromised, is entitled to lodge a complaint to the Supervisory Authority for the protection of personal data, in the manner indicated by the Authority to the following Internet address:

<http://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/4535524>.

For further information on the rights of Data Subjects provided by the Guarantor, please refer to the following link: <https://www.garanteprivacy.it/home/modulistica-e-servizi-online>

Changes and updates

This policy shows the date of its last update in its header.

Fondinox S.p.A. may also make changes and/or additions to this privacy policy because of any subsequent amendments and/or regulatory additions.

References to the regulations on the Data Subject rights

Article 15

Right of access by the Data Subjects

1. The Data Subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her is being processed, and, where that is the case, access to the personal data and the following information:
 - a) The purposes of the processing.
 - b) The categories of personal data concerned.
 - c) The recipients or categories of recipient to whom the personal data have been or will be disclosed, recipients in third countries or international organisations.
 - d) Where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period
 - e) The existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the Data Subject or to object to such processing.
 - f) The right to lodge a complaint with a supervisory authority.
 - g) Where the personal data is not collected from the Data Subject, any available information as to their source.
 - h) The existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the Data Subject.
2. Where personal data is transferred to a third country or to an international organisation, the Data Subject shall have the right to be informed of the appropriate safeguards pursuant to Article 46 relating to the transfer.
3. The controller shall provide a copy of the personal data undergoing processing. For any further copies requested by the Data Subject, the controller may charge a reasonable fee based on administrative costs. Where the Data Subject makes the request by electronic means, and unless otherwise requested by the Data Subject, the information shall be provided in a commonly used electronic form.
4. The right to obtain a copy referred to in paragraph 3 shall not adversely affect the rights and freedoms of others.

Article 16

Right to rectification

The Data Subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Considering the purposes of the processing, the Data Subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

Article 17

Right to erasure ('right to be forgotten')

1. The Data Subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies:
 - (a) The personal data is no longer necessary in relation to the purposes for which they were collected or otherwise processed.
 - (b) The Data Subject withdraws consent on which the processing is based according to point (a) of Article 6(1), or point (a) of Article 9(2), and where there is no other legal ground for the processing.
 - (c) The Data Subject objects to the processing pursuant to Article 21(1) and there are no overriding legitimate grounds for the processing, or the Data Subject objects to the processing pursuant to Article 21(2).
 - (d) The personal data has been unlawfully processed.
 - (e) The personal data must be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.
 - (f) The personal data have been collected in relation to the offer of information society services referred to in Article 8(1).
2. Where the controller has made the personal data public and is obliged pursuant to paragraph 1 to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers which are processing the personal data that the Data Subject has requested the erasure by such controllers of any links to, or copy or replication of, those personal data.
3. Paragraphs 1 and 2 shall not apply to the extent that processing is necessary:
 - (a) For exercising the right of freedom of expression and information.

- (b) For compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- (c) For reasons of public interest in public health in accordance with points (h) and (i) of Article 9(2) as well as Article 9(3).
- (d) For archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) in so far as the right referred to in paragraph 1 is likely to render impossible or seriously impair the achievement of the objectives of that processing; or
- (e) For the establishment, exercise, or defence of legal claims.

Article 18

Right to restriction of processing

1. The Data Subject shall have the right to obtain from the controller restriction of processing where one of the following applies:
 - a) The accuracy of the personal data is contested by the Data Subject, for a period enabling the controller to verify the accuracy of the personal data.
 - b) The processing is unlawful, and the Data Subject opposes the erasure of the personal data and requests the restriction of their use instead.
 - c) The controller no longer needs the personal data for the purposes of the processing, but they are required by the Data Subject for the establishment, exercise, or defence of legal claims.
 - d) The Data Subject has objected to processing pursuant to Article 21(1) pending the verification whether the legitimate grounds of the controller override those of the Data Subject.
2. Where processing has been restricted under paragraph 1, such personal data shall, with the exception of storage, only be processed with the Data Subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.
3. A Data Subject who has obtained restriction of processing pursuant to paragraph 1 shall be informed by the controller before the restriction of processing is lifted.

Article 19

Notification obligation regarding rectification or erasure of personal data or restriction of processing

The controller shall communicate any rectification or erasure of personal data or restriction of processing carried out in accordance with Article 16, Article 17(1) and Article 18 to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The controller shall inform the Data Subject about those recipients if the Data Subject requests it.

Article 20

Right to data portability

1. The Data Subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where:
 - a) The processing is based on consent pursuant to point (a) of Article 6(1) or point (a) of Article 9(2) or on a contract pursuant to point (b) of Article 6(1); and
 - b) The processing is carried out by automated means.
2. In exercising his or her right to data portability pursuant to paragraph 1, the Data Subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.
3. The exercise of the right referred to in paragraph 1 of this Article shall be without prejudice to Article 17. That right shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.
4. The right to obtain a copy referred to in paragraph 1 shall not adversely affect the rights and freedoms of others.

Article 21

Right to object

1. The Data Subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on point (e) or (f) of Article 6(1), including profiling based on those provisions. The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights, and freedoms of the Data Subject or for the establishment, exercise, or defence of legal claims.
2. Where personal data is processed for direct marketing purposes, the Data Subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing.

3. Where the Data Subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.
4. At the latest at the time of the first communication with the Data Subject, the right referred to in paragraphs 1 and 2 shall be explicitly brought to the attention of the Data Subject and shall be presented clearly and separately from any other information.
5. In the context of the use of information society services, and notwithstanding Directive 2002/58/EC, the Data Subject may exercise his or her right to object by automated means using technical specifications.
6. Where personal data is processed for scientific or historical research purposes or statistical purposes pursuant to Article 89(1), the Data Subject, on grounds relating to his or her particular situation, shall have the right to object to processing of personal data concerning him or her, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

Article 22

Automated decision-making, including profiling

1. The Data Subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.
2. Paragraph 1 shall not apply if the decision:
 - (a) Is necessary for entering into, or performance of, a contract between the Data Subject and a data controller.
 - (b) Is authorised by Union or Member State law to which the controller is subject, and which also lays down suitable measures to safeguard the Data Subject's rights and freedoms and legitimate interests; or
 - (c) Is based on the explicit consent of the Data Subject.
3. In the cases referred to in points (a) and (c) of paragraph 2, the data controller shall implement suitable measures to safeguard the Data Subject's rights and freedoms and legitimate interests, at least the right to obtain human intervention on the part of the controller, to express his or her point of view and to contest the decision.
4. Decisions referred to in paragraph 2 shall not be based on special categories of personal data referred to in Article 9(1), unless point (a) or (g) of Article 9(2) applies and suitable measures to safeguard the Data Subject's rights and freedoms and legitimate interests are in place