

PRIVACY POLICY – INFORMATION ON PERSONAL DATA PROCESSING

DATA PROCESSED BY ITACOIL

This document concerns data processing according to the Regulation (EU) 2016/679 on the protection of personal data collected through the registration processes for Itacoil services, provided by Data Subjects requesting information or on other occasions, as well as personal data collected from the website visits.

Itacoil does not process any special category of personal data (personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation) of Data Subjects to whom this information is directed.

Web contact form and direct contacts

Personal data collected through the registration processes are divided into two categories: mandatory and optional.

The provision of mandatory data and the related processing for the purposes indicated in the paragraph "PURPOSES OF PERSONAL DATA PROCESSING" are strictly functional to the execution of the requested services. Refusing to provide such data or to allow their processing may make it impossible to use the services provided by Itacoil.

The optional data are aimed at improving Itacoil services.

User registration

The access to some contents of our website requires user registration by entering the e-mail address.

Cookies and browsing within the website

The Itacoil website uses technical cookies and third parties' cookies when users visit its pages.

Read the [Cookies Policy](#).

Newsletters

Itacoil's customers and users who, filling out the contact form, consent to the registration to our mailing list (by ticking the appropriate box), receive an informative and promotional newsletter.

The registration request for unlocking protected contents is followed by a confirmation e-mail sent to the entered e-mail address.

By confirming, the user is automatically subscribed to our mailing list.

An unsubscription link is available in the confirmation e-mail and in every subsequent newsletter.

If you do not want to receive the Itacoil newsletter any more, click [here](#).

Unsubscribing from the mailing list does not determine the erasure of personal data from Itacoil databases.

To request the definitive erasure from Itacoil's databases, contact the Data Controller as indicated in the paragraph "RIGHTS OF THE DATA SUBJECT" at the end of this document.

e-mail

Itacoil e-mail accounts are managed through QBOXMAIL, a Cloud e-mail Hosting service.

Data transmitted via e-mail, names and addresses included, are also stored on external QBOXMAIL servers.

With regards to the processing of such data, consult the following links:

[QBOXMAIL's statement about GDPR \(Regulation EU 2016/679\) compliance](#)

[QBOXMAIL's privacy policy \(italian\)](#)

Social networks

Itacoil is on [Facebook](#), [Google+](#) and [LinkedIn](#).

Any personal data provided through social networks are processed by Itacoil in the same way as the data collected through the other channels, and can be stored in external servers managed by the social networks.

Regarding the processing of data by the social networks, consult the relevant privacy policies:

[Facebook](#)

[Google](#)

[LinkedIn](#)

Web hosting

Itacoil uses the web hosting service provided by Aruba.it.

Therefore, personal data entered by the website users can be stored in their servers.

Aruba.it guarantees not to exercise any control over the data of its customers stored in their servers.

Consult the privacy policy:

[Aruba](#)

DATA CONTROLLER

ITACOIL srl – Via delle Gerole, 7 – 20867 Caponago (MB) Italy – Tel (+39) 02 9574 5131 – e-mail: contatto@itacoilmail.it

EXTERNAL DATA PROCESSORS

Personal data collected by Itacoil may also be provided to external subjects (i.e. consultants, professionals, etc.) exclusively for purposes instrumental to the performance of our core business and to any other related activities.

The Controller appoints these subjects as Data Processors.

The updated list of external Data Processors can be requested to the Data Controller.

LEGAL BASIS FOR PERSONAL DATA PROCESSING

Personal data processing is lawful under Regulation EU 2016/679 as it is based on the Data Subject's unambiguous consent or on the legitimate interest of the Data Controller.

Unambiguous consent

Itacoil requires consent for personal data processing in the following cases:

- access to the website: at the first access a banner informs the user on the use of cookies, also clarifying that continuing the browsing within the website equals giving consent to this kind of data processing; this request for consent is renewed every month;
- completion of the contact form:

- catalogue request: by ticking the appropriate box, the user agrees to the processing of his personal data for the purpose of sending the Itacoil catalogue;
- subscription to the mailing list: by ticking the appropriate box, the user agrees to the processing of his personal data for the purpose of sending the Itacoil newsletter;
- by ticking the appropriate box (mandatory for sending the form), the user declares to have read the legal notice, including this privacy policy, and agrees to the processing of the data entered, for the aims listed in the paragraph "PURPOSES OF PERSONAL DATA PROCESSING";
- user registration: by ticking the appropriate box the user agrees to personal data processing; in absence of consent, the registration cannot be completed.

Legitimate interest of the Data Controller

According to the Regulation EU 2016/679, personal data can be processed even without the Data Subject's explicit consent if there is a legitimate interest of the Data Controller.

By assessing the existence of a legitimate interest, the Controller takes into consideration what the Subject may reasonably expect regarding the processing of his personal data, considering the type of relationship between the Subject and the Controller.

In particular, Itacoil reserves the right to carry out rare marketing initiatives, even in the absence of explicit consent, directed to those Subjects who are actual customers or potential customers who requested information about Itacoil products, and who have not explicitly requested the unsubscription from the mailing list (see paragraph "Newsletters").

Some personal data, such as e-mail addresses and telephone numbers, provided by Data Subjects through various channels can be stored in databases and used by Itacoil for some of the purposes listed below.

PURPOSES OF PERSONAL DATA PROCESSING

Itacoil processes personal data for the following purposes:

- fulfilment of current or future commercial and contractual relationships;
- administrative or accounting obligations;
- fulfilment of legal obligations;
- commercial information;
- technical information;
- market research;
- protection of Itacoil's rights in court.

The data are currently only used within Itacoil's business but in the future they may be disseminated to companies belonging to the same group or owned by the same shareholders and possibly to companies that, for whatever reason, will continue in whole or in part the same Itacoil's business.

Currently data are not transferred to third countries or international organizations, with the exception of what is indicated in the following paragraph "DATA RETENTION".

DATA RETENTION

The collected data may be stored on Itacoil's servers (Via delle Gerole, 7 – 20867 Caponago MB Italy) or on external servers (see "e-mail", "social networks" and [cookies policy](#)), even outside the European Union.

The data are retained on Itacoil's servers until the possible request of deletion by the Subject.

As for data retained on external servers, refer to the privacy policies listed before (see "e-mail", "social networks" and [cookies policy](#)).

RIGHTS OF THE DATA SUBJECT

Itacoil gives notice that, according to the Regulation EU 2016/679, the Data Subjects have the following rights:

- **access to data:** the Data Subject has the right to obtain from the Data Controller confirmation as to whether or not personal data concerning him or her are being processed, the communication of them and of their origin, as well as the logic and the purposes of the processing (see [article 15](#) of the Regulation EU 2016/679);
- **rectification or erasure of data:** the Data Subject has the right to obtain from the Data Controller the rectification of inaccurate personal data concerning him or her, the integration of incomplete data and, in some cases, the erasure of data (see [article 16](#) and [article 17](#) of the Regulation EU 2016/679);
- **restriction of processing:** the Data Subject has the right to obtain from the Data Controller the restriction of processing of his or her personal data, that is limiting to the retention of such data without subjecting them to other types of data processing until a future consent from the Subject (see [article 18](#) of the Regulation EU 2016/679);
- **data portability:** the Data Subject has the right to receive from the Data Controller his or her personal data for storing them on a personal device and possibly transmit them to another Controller (see [article 20](#) of the Regulation EU 2016/679);
- **objection to data processing:** the Data Subject has the right to object at any time to processing of personal data concerning him or her (see [article 21](#) of the Regulation EU 2016/679);
- **withdrawal:** the Data Subject has the right to withdraw consent on which the processing is based, for example aimed at sending commercial information, special offers and promotion (see [article 7](#), paragraph 3 of the Regulation EU 2016/679);
- **complaint with a supervisory authority:** if the Data Subject considers that the processing of personal data relating to him or her infringes this Regulation, he/she has the right to lodge a complaint with a supervisory authority (see [article 77](#) of the Regulation EU 2016/679).

For exercising these rights, contact the Data Controller:

e-mail: contatto@itacoilmail.it

Phone: (+39) 02 9574 5131