

# PRIVACY POLICY

*Circular letter on personal data processing performed by the website: [specchiasol.it](http://specchiasol.it), in compliance with art. 13 of the European General Data Protection Regulation (GDPR – 2016/679)*

**Specchiasol S.R.L.**, as data controller, notify to data subjects the following information on data processing.

This circular letter is referred to and is valid only for this website ([specchiasol.it](http://specchiasol.it)) and not for other external websites surfed by the user through links available in [specchiasol.it](http://specchiasol.it). The data controller isn't responsible of processing performed by third part websites. Please take a look to data processing policy when you visit a third part website.

## DATA CONTROLLER

The data controller is **Specchiasol S.R.L.**, VAT number: IT01365850237 and established in Via Bruno Rizzi 1/3, 37012 Bussolengo (VR) - Italy. You can contact the data controller by the following mail address: [info@specchiasol.it](mailto:info@specchiasol.it)

## PURPOSES OF PROCESSING, LEGAL BASIS AND RETENTION TIME

We process personal data only with a proper legal basis established by law. In the following list you can find all the information concerning the purposes of processing, the types of personal data processed, the legal basis and the data retention time.

<b>Purposes of processing</b>	<b>Categories of personal data</b>	<b>Legal Basis</b>	<b>Data retention time</b>
To browse on the website and guarantee the proper functionality and cyber security to the website itself and other users.	Browsing data	Legitimate interest pursued by the controller to promote his own business through his website, to maintain it online, reachable and to defend itself and the other visitors against possible cyber attacks	Data controller will keep the browsing data for the time strictly necessary to reach processing purposes. For what concern cookies retention time more information are available consulting the website's Cookie Policy.
To manage commercial and information requests received through the contact forms or other communication means available on the website	Identification data Data concerning contact details and addresses	Legitimate interest of Data Controller concerning the management of communications with data subjects to satisfy specific submitted requests  To perform a contract in which data subject is part or to manage pre-contractual requests submitted by data subjects	This data will be processed for the time strictly necessary to manage your request. After this process, data submitted to fulfill your enquiry will be deleted or further processed for other purpose, if a commercial agreement took place (ex. to manage the service provision).
To send newsletter and other commercial communications following your sign in through the	Data concerning contact details and addresses	Data subjects explicit consent	Your e-mail address will be kept until the revocation of your consent, by sending an unsubscription request to

newsletter form			our address or following the unsubscription link available in our communications.  After your unsubscription request we will interrupt the newsletter sending.
To carry out promotional activities, sending advertisement material and completing market researches directly to the user;	<p>Identification data</p> <p>Data concerning contact details and addresses</p> <p>Browsing data</p> <p>Data related to purchasing and browsing habits</p>	<p>Data subjects explicit consent</p> <p>Legitimate interest of data controller regarding the communications sent with <i>Soft Spam</i> modalities (as described in following section "Type of data processed")</p>	<p>We will process your data for marketing purposes until your consent revocation.</p> <p>If the recipient of promotion activities is already our partner, the data retention period will be the same as for business and administrative management (10 years after business relation end); however data subject may always exercise his rights to prevent data controller to further perform this data processing activity.</p>
"Careers" form/personal area	<p>Identification data</p> <p>Data concerning contact details and addresses</p> <p>Browsing data</p> <p>Personal data included in data subject CV or requested in the application form</p>	To perform a contract in which the data subject is party or to manage pre-contractual requests submitted by data subjects	Your data will be stored for the time strictly necessary to evaluate your application. Retention time won't anyway exceed 24 months since the submission of your application.

## TYPES OF PERSONAL DATA PROCESSED

**Surfing data** - Systems and software procedures responsible for the functioning of this website acquire, during their normal operation, several personal data which transmission is implicit in the use of Internet communication protocols.

Those information is not collected to be associated with the purpose to identify data subjects, but them might allow users to be identified through further processing and association with other data held by data controller or third parties.

This category of data includes:

- IP addresses or domain names of computers utilized by users connecting to the site;
- the URI (Uniform Resource Identifier) addresses of the requested resources;
- the time of request;
- the method used in submitting the request to the server;
- the size of file obtained in response;
- the numeric code indicating the status of response given by the server (good result, error, etc.),
- other parameters relating to the operating system and the user's IT environment.

This data are processed only to obtain anonymous statistical information on the use of the site and to check its proper functioning, and are deleted immediately after processing. The data could be used to ascertain responsibility in case of hypothetical cybercrimes that might damage the website or other users during the browsing session.

The website could also automatically process data through setting cookies in user's browser. Cookies are small strings of text set during the browsing in the website and, according to their purposes and the values set up, they allow the site and/or third parties to collect information related to the user, usually anonymously. The use of this electronic tool is analytically described through the cookie declaration on the website.

For the setting of specific type of cookie, users have the faculty to choose which kind of tool they would receive, expressing or denying their specific consent. This faculty can be exercised during the first access on the website through the cookie banner or, in a second moment, in the cookie declaration area available on the website.

### **reCAPTCHA Tool**

The website uses reCAPTCHA tool by Google, to guarantee an high degree of cyber security against BOT or similar technologies exploited to damage the website or users and for other fraudulent purposes. This tool is used in the pursuing of the legitimate interest of data controller, processing users navigation data without tracking or analysis purposes. To obtain further information about the data processing made through that tool you can also check Google privacy policy, available at the following URL: <https://policies.google.com/>?

**Personal data sent by the user:** The user can submit his personal data to data controller by the following tools available on the website:

- a) **Contact form:** through contact forms available in the website the users can submit specific requests to data controller. It's required to submit personal identification data and contact details as well as other information to allow data controller to manage the request. Data collected will be exclusively processed to answer to the submitted requests and would be further kept and processed only if a business relationship will take place between data subject and data controller.
- b) **Newsletter and data processing to pursue marketing purposes:** data controller may carry out promotional activities about his business to users and customers by sending e-mails or other communications containing commercial and marketing information. This processing will be performed in compliance with regulations on data protection and within the ethical limits, without causing damage to the rights and freedoms of the data subjects. To pursue the purpose of providing newsletter service or other direct and indirect marketing activities, the data processing is subject to your prior consent, provided checking the related tick during data submission.

Promotional communications may also be delivered to data subjects using *Soft Spam* modalities, without the specific consent of recipients. These communications will mandatory have the following features:

- the activity consists in sending e-mails to recipients which already have entertained commercial relationship with data controller and the e-mail addresses have been communicated to manage or within the business relations.
- the contents will concern products or services related to those whom the recipient has already purchased.

However, data subject has the faculty to exercise his rights, opposing or limiting the processing activities. Those rights may be exercised when personal data are collected or whenever a message with marketing purposes will be delivered from data controller.

- c) **"Careers" form/area:** Inside our website is available a "Careers" form/area, in which the user can submit applications to job opportunities or send his own CV to data controller. The personal data submitted to data controller will be processed to evaluate the fitness of applicants to open job positions in the company.

## TRASMISSION OF PERSONAL TO THIRD PARTIES

Your personal data may be transmitted only to the following third parts:

- Companies which provide IT systems and website management and development services (as e-commerce and secure payment infrastructure, web development consultants, etc.);
- Companies and professional offices which provide business assistance and consultancy (IT technologies, accounting, etc.);
- Companies which provide technical or consultancy services concerning market research, marketing and business promotion;
- Public institutions, for the fulfillment of legal obligations related to commercial relationship, to investigate on crime or cyber-attacks delivered or suspected to our systems or to other visitors, or to manage disputes.

Further information related to the third parties who may process your personal data are available by submitting a specific request to the data controller.

## PROVISION OF DATA AND CONSEQUENCES OF REFUSAL TO REPLY

The communication of your personal data is mandatory when the process is necessary to browse in the website, to carry out commercial and information requests received through contact forms or **personal area**, to provide the services and to perform a contract with customers. the denial to submit those data will affect our capability to carry out your requests.

In the other cases, such as for marketing purposes, the transmission of data it's optional and when necessary dependent to your explicit consent.

## RIGHTS OF DATA SUBJECTS

We inform you about the existence of your rights **to access** to your personal data, **to rectify** and/or **cancel** the same, **restrict the process performed on your data**, **object** to processing activities and to request **data portability** (Articles 15 to 22 of the EU Regulations 2016/679 GDPR);

You can exercise your rights and get acknowledge about third parties to whom data may be shared with by writing to the e-mail address: **info@specchiasol.it**

If data processing has as legal base your explicit consent (art. 6, § 1, lect. a), you may revoke that consent in every moment, without prejudicing the lawfulness of processing activities previously carried out.

You are entitled to file your complaints with the control authority at the Supervisory Authority address for the protection of personal data, by sending a certified e-mail to the address [protocollo@pec.gpdp.it](mailto:protocollo@pec.gpdp.it), or with the control authority of another EU member country.

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