



## **WEBSITE PRIVACY POLICY**

### **made pursuant to art. 13 of EU Regulation no. 2016/679 ("GDPR")**

The Company **TAPI' S.p.A.** With registered office at via Cornara Est 2/F Massanzago (PD), (hereinafter, "**TAPI**" or "**The Company**") undertakes to protect the user's ("**User**") personal data on the <https://tapigroup.com/> website ("**Site**") and, as data controller, is required, pursuant to article 13 of EU Regulation 679/2016 (*General Data Protection Regulation*, "**GDPR**"), to provide the user with information regarding the processing of personal data. This Privacy Policy is not applicable to other websites owned by third parties which are accessible via links present on the Site. Please read the privacy policies of these third-party sites regarding their processing of personal data.

### **WHICH DATA MAY BE PROCESSED**

The following types of User data may be processed through the Site (hereinafter jointly referred to as "**personal data**").

#### **A) Navigation data and cookies**

The information systems and software procedures used for operation of the Site acquire, during their normal operation, some personal data, the transmission of which is implicit in the use of internet communication protocols. This involves information which has been gathered, not to be linked to individuals, but which by its nature could be used to identify Users via processing and association with data held by third parties. This category of data includes the IP addresses of the computers operated by the Users connecting to the site, addresses of the requested resources in URI (*Uniform Resource Identifier*) notation, the time of the request, the method used in submitting the request to the server, the size of the file returned, the numerical code indicating the status returned by the server (OK, error, etc.), and other parameters related to the operating system in use. This data is used only to obtain anonymised statistical information on the use of the Site in order to check its proper operation, and it is deleted immediately after processing. The data could be used to ascertain responsibility in the event of any computer crimes against the Site.

Furthermore, the Site uses cookies, in accordance with our [cookie policy](#).



## **B) Personal data voluntarily provided by the User**

The Company processes some personal data that can be voluntarily provided by Users, also through specific forms:

- for requesting information by filling in the "Contact" form on the Site (name, surname, e-mail address, object, city, country, message);
- for subscribing to the newsletter by filling in the "Subscribe to the newsletter" form on the Site (name, surname, e-mail address, city, country)
- for submitting the unsolicited application by the User via the "Work with us" form on the Site (name, surname, e-mail address, area of interest, city, country, data available from the attachments or from the message possibly left by the User, cv);
- To receive magazines and catalogues by filling in the appropriate request form on the Site (name, surname, e-mail address, city, type of catalogue, address, postal code, province, country).

or personal data that can be sent to the company by e-mail or any other way using the contact details provided on the Site.

## **FOR WHICH PURPOSES IS PERSONAL DATA USED?**

The Company processes its personal data for one or more of the following purposes, in accordance with the legal basis indicated from time to time.

### **a) Responding to the User's request for information forwarded by filling in the "Contacts" form on the Site.**

The Company processes the User's personal data in order to manage and respond to requests for information forwarded by filling in the "Contacts" form on the Site.

Prerequisites for processing: fulfilment of a contractual obligation or execution of pre-contractual measures pursuant to art. 6, para. 1, lit. b) of the GDPR Provision of personal data marked with an asterisk is mandatory; failing this, the Company cannot respond to requests of the User or execute the contract or the pre-contractual measures requested by the user.

### **b) Managing the unsolicited application by the User by filling in the "Work with us" form on the Site.**

The Company processes the User's personal data in order to manage the unsolicited application submitted by the User via the "Work with us" section on the Site.

Prerequisites for processing: Execution of pre-contractual measures, pursuant to art. 6, para. 1, lit. b) of the GDPR Provision of personal data marked with an asterisk is

mandatory because failing this, the Company will be unable to respond to requests for the search and selection of personnel and thus be unable to establish any employment relationship with the User.

**c) Sending promotional and commercial communications (newsletter).**

The Company processes the User's name, surname, and e-mail address for marketing purposes aimed at providing information by sending newsletters on promotional initiatives relating to products and events through automated contact methods (i.e. e-mail).

Prerequisites for processing: Consent by the User pursuant to art. 6, para. 1, lit. a) of the GDPR, which can be revoked at any time using the contact details of the Company below. Absence of consent has no consequences other than the impossibility for the User to receive promotional and commercial communications.

**d) Sending of informative material (magazine or catalogue)**

The Company may process the User's personal data in order to send information material (magazines and/or catalogues) specifically requested by the User both in paper form and in digital format to the User.

Prerequisites for processing: execution of a contract pursuant to art. 6, para. 1, lit. b) of the GDPR. Provision of such personal data is necessary, otherwise the Company will be unable to send magazines and/or catalogues to the User.

**e) Purposes related to the obligations established by laws, regulations or community legislation, by provisions/requests of authorities legitimated by the law and/or by supervisory and control bodies.**

The Company may process the User's personal data to fulfil its obligations.

Prerequisites for processing: fulfilment of a legal obligation pursuant to art. 6, para. 1, lit. c) of the GDPR. Provision of such personal data is mandatory, otherwise the Company will be unable to fulfil specific obligations prescribed by law.

**f) Defence of rights in the course of judicial, administrative or extra-judicial proceedings, and in the context of disputes arising in relation to the services/activities offered.**

The Company may process personal data in order to defend its own rights or act or even make claims against the User or third parties.

Prerequisites for processing: legitimate interest of the Company to protect its rights pursuant to art. 6, para. 1, lit. f) of the GDPR. In this case, a new and specific provision is not required since the Company will pursue this additional purpose, where

necessary by processing the data gathered for the aforementioned purposes which are deemed compatible with the present purpose (also because of the context in which the data has been gathered, the nature of the data and of the adequate guarantees for its handling, as well as the link between the aforementioned purposes and the present one).

## **HOW WE KEEP YOUR PERSONAL DATA SECURE AND WHERE**

The Company takes appropriate safety measures in order to improve the protection, security, integrity, and accessibility of your personal data.

All of Your personal data is held on our protected servers (or on suitably archived paper copies) or on those of our suppliers and is accessible and usable based on our standards and our security policies (or on equivalent standards of our providers).

For carrying out some of the data processing activities on the personal data of the User, the Company transmits this data to external subjects located in countries not belonging to the European Union (EU) or the European Economic Area (EEA)(hereinafter the “Third Countries”)

In such a case, the Company communicates that the personal data is transferred to Italy; the legitimacy of this transfer is in any case guaranteed through the instruments provided by article 46 of the GDPR, the Company having signed up to the Standard Contractual Clauses approved by the European Commission (supplemented by additional technical/organisational/legal measures) and, where present, due to the existence of an adequacy decision pursuant to art. 45 of the GDPR issued by the European Commission.

These external subjects will process the personal data as independent data controllers or as data processors, duly appointed by the Company in compliance with standards for the protection of personal data (depending on the role they play in relation to the processing)

You can write to the Company at any time using the contact details below, asking who are the subjects to whom the personal data will be transferred, and to receive a copy of the guarantees adopted for the transfer.

## **FOR HOW LONG DO WE STORE YOUR PERSONAL DATA**

We keep your personal data only for as long as is necessary to achieve the purposes for which they have been gathered or for any other legitimate related purpose. Therefore, if the personal data has been used for two different purposes, we will keep

this data for as long as the purpose with longest duration requires. In any case, we will no longer process personal data for that purpose whose retention period has expired.

Personal data that is no longer necessary, or for which there is no longer a legal prerequisite for its retention, is irreversibly anonymised (and in this manner it can be stored) or destroyed in a secure manner. Browsing data is not stored by the portal, except for any need by the legal authorities to ascertain crimes.

Data processed in order to fulfil any contractual obligation may be stored for the entire duration of the contract and in any case no later than the following 10 years, in compliance with the statute of limitations established by law.

Data processed for purposes related to the sending of promotional and commercial communications (newsletter) may be stored until the revocation of consent, without prejudice to the Company's obligation to periodically renew the consent.

Similarly, data processed for the purpose of sending informative material (magazines and/or catalogues) may be kept for the time necessary to send them - in any case, no longer than 3 months.

Data processed for the purpose of responding to requests will be kept for the time needed to respond to You, and thereafter for 3 more months.

Data processed in the context of the unsolicited application by the User through the "Work with us" section may be kept for a period of 12 months from the date on which the application is sent.

For the case when it is necessary to process data for judicial purposes, the data will be kept for a time during which any claims could be pursued by law.

## **WITH WHOM DO WE SHARE YOUR PERSONAL DATA**

Duly authorised employees of the Company can have access to the personal data of Users, as well as possibly external providers (including consultants) who are appointed, if necessary, as data processors.

One can contact the Company using the details provided in the "Contacts" section if one wishes to view the list of data processors and other subjects to whom the data is communicated.

## **YOUR RIGHTS REGARDING THE PROTECTION OF THE DATA AND YOUR RIGHT TO SUBMIT CLAIMS BEFORE THE SUPERVISORY AUTHORITY**

You have the right to obtain access to Your Data from the Company subject to the existence of the legal prerequisite for your request:

- a) access to your data, as required by art. 15 of the GDPR;
- b) amendment or integration of Your Data that is in our possession but that is deemed incorrect, as provided for by art. 16 of the GDPR;
- c) deletion of Your Data, for which the Company would no longer have a legal prerequisite for its processing, as provided for in art. 17 of the GDPR;
- d) revocation of consent for cases where the processing is based on consent, pursuant to art. 7 of the GDPR;
- e) limitations in how we process the data insofar as it involves one of the hypotheses provided for by art. 18 of the GDPR;
- f) the copy of the Data You provided to the Company in a structured format, for shared use and readable by an automatic device, and transmission of this data to another data controller (so-called portability), as provided for in art. 20 of the GDPR.

**Right to object:** Users have the right to object, in whole or in part, to the use of personal data processed by the Company, providing the conditions exist as established in the personal data protection legislation, for example in the case where the personal data is processed for direct marketing purposes.

In the event that You would exercise one of the aforementioned rights, it will be the responsibility of the Company to verify that You are entitled to exercise it and You will be notified, as a rule, within one month.

In the event that the User deems that the processing of his personal data occurs in violation of the provisions established in the personal data protection legislation, he has the right lodge a complaint with the Guarantor for the protection of personal data, using the references available on the website <https://www.garanteprivacy.it/>, or by appealing to the appropriate judicial offices.



## **CONTACTS**

The contact details of the Company for requests and for the exercise of rights relating to the processing of personal data are as follows: PEC [tapispa@pec.it](mailto:tapispa@pec.it); telephone +39 0495797300.

For more information about our services, please write to the following e-mail address [info@tapigroup.com](mailto:info@tapigroup.com) or call the telephone number +39 0495797300.