

## Privacy Notice

This Notice is provided pursuant to Article 13 of the European Regulation no. 2016/679 (GDPR), to users of the Web portal and services of Forge Fedriga S.r.l. (hereafter, for the sake of brevity, also referred to as "Forge Fedriga") accessible electronically from [www.forgefedriga.it](http://www.forgefedriga.it) and [www.forgefedriga.com](http://www.forgefedriga.com).

This notice is limited to browsing the site mentioned above and does not apply to sites outside Forge Fedriga, even if visited from links on the corporate website and/or on the thematic websites.

This notice describes the modalities of managing the Forge Fedriga corporate website in relation to the processing of personal data of users who consult it and/or who use online services.

### 1. Data Controller

The consultation of the Forge Fedriga corporate website may involve processing of data regarding identified or identifiable subjects. The subscription of online services involves processing of personal data relating to individuals. The data controller is Forge Fedriga S.r.l., with registered office in Via dell'Artigianato no. 13, 25040 Cividate Camuno (BS), VAT no. 00652470980, contactable at the following addresses: Ordinary mail: Via dell'Artigianato no. 13, 25040 Cividate Camuno (BS), Tel. +39 0364 34741 and e-mail: [privacy@forgefedriga.com](mailto:privacy@forgefedriga.com).

### 2. Data recipients

The recipients of data collected following the consultation of the website indicated above are designated by Forge Fedriga, pursuant to Article 28 of the Regulation, as data processors.

The list of Data Processors is available at the Forge Fedriga's registered office.

### 3. Place of data processing

Processing for services of Forge Fedriga website takes place mainly at Forge Fedriga offices. It is carried out by personnel identified and duly authorised according to the specific purposes of the services requested and subscribed. For the above-mentioned processing, Forge Fedriga can avail itself of the support of external companies, consultants, consortia, software suppliers and services which, through identified and appointed personnel, are working within the scope of the intended purposes and in order to guarantee maximum security and confidentiality of data. In particular, if necessary, data related to the contact service can be processed by the personnel of the company that provides for the maintenance of the technological part of the website.

### 4. Type of data processed

#### Navigation data

The computer systems aimed at the correct use of the Forge Fedriga website acquire, during normal browsing, some data whose transmission is implicit in the use of Internet communication protocols.

This information is used to obtain anonymous statistical information on the use of the portal and to check its correct functioning and are not associated with identified users; however, by their nature and through associations with data held by third parties, they could allow identification of data subjects. 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 (except for any need to ascertain crimes by the judicial authorities).

#### Data provided voluntarily by the user while using online services

Personal data are used for online services that provide for the sending of e-mails, as freely provided by users in different ways:

- **Contacts:** personal data freely provided by users are used for the contact form or for sending e-mail. By filling in the contact form with his/her own data, the user consents to their use to respond to requests for information. In particular, personal data collected are the name and surname, and the e-mail address, together with the message to be sent. Further information, which is not mandatory, can allow a quicker reply to the questions asked.
- **Newsletter:** by subscribing the newsletter, the user's email address is automatically added to a list of contacts to which emails containing promotional messages can be transmitted. In particular, personal data collected are the e-mail address and the name of the user. Sending is done through the external platform [www.forgefedriga.com](http://www.forgefedriga.com). This service allows you to collect data regarding the date and time messages are displayed by the User, as well as the User's interaction with them, such as information on clicks on the links inserted in the messages. At any time the user can object to sending communications or unsubscribe from the newsletter.

### 5. Use of cookies

For information on the use of cookies within Forge Fedriga's websites, please refer to the specific notice available on the website at the bottom of each page.

## 6. Purpose and legal basis of processing

Personal data provided will be processed by Forge Fedriga for the following purposes:

- i) signature of a contract of which it is a party or for the execution of pre-contractual measures adopted upon the data subject's request (e.g. contact request via the Contact form);
- ii) ii) management of registration in the Reserved area for downloading corporate documents;
- iii) iii) management of the newsletter subscription for sending promotional communications by Forge Fedriga;
- iv) iv) fulfilment of a legal obligation to which Forge Fedriga is subject;
- v) v) verification, exercise or defence of a right in court or whenever the jurisdictional authorities exercise their
- vi) jurisdictional duties

The legal basis of the processing of personal data for the purposes referred to in point i) is the provision of a service or the reply to a request that does not require consent under the GDPR.

For purposes referred to in points ii) and iii), processing is based on the express consent of the user upon subscription to the newsletter. Please note that it is possible to withdraw the consent expressed herein at any time, by means of a written notice to the addresses indicated above or, with reference to the newsletter, using the link at the bottom of each communication. This does not jeopardise the lawfulness of the processing based on the consent given before the withdrawal. We invite users to promptly communicate any changes in the data provided.

The purposes referred to in points iv) and v) represent a legitimate processing of personal data in accordance with the applicable legislation as processing is necessary to fulfil a legal obligation or to exercise the right of defence before the courts, once personal data are transferred.

## 7. Optional provision of personal data

With reference to the "Contact" service, the provision of personal data is necessary to correctly process the request and verify that it is not automatically generated by bots.

With reference to the "Newsletter" service, the provision of personal data is necessary to send communications.

## 8. Data retention

Forge Fedriga will process personal data from the data subject for the time strictly necessary to achieve the aforementioned purposes. For example, Forge Fedriga will process personal data for sending the newsletter until the user decides to unsubscribe from the service. Without prejudice to this, Forge Fedriga will process personal data of data subjects within the time limits set by law to protect their interests (art. 2947 of the Italian Civil Code).

## 9. Rights of data subjects

Within the limits of the GDPR, the data subjects have the right to ask Forge Fedriga, at any time, access to their personal data, to rectify or delete them or to object their processing, limit their processing and obtain in a structured, commonly used and machine-readable format data regarding them.

Requests should be sent via e-mail to the address: [privacy@forgefedriga.com](mailto:privacy@forgefedriga.com)

Pursuant to Applicable Regulations, the data subject has, in any case, the right to file a claim to the competent supervisory authority (Guarantor for the Protection of Personal Data) if he/she considers that the processing of his/her personal data is contrary to the law in force.

## 10. Further information

### **Defence before the courts**

User's personal data can be used for the defence by the Data Controller before the courts or in the stages preceding its setting, in case of abuse in the use of sites hosted on Forge Fedriga domains or related services by the user.

The user declares to be aware that the Data Controller may be required to disclose data upon request from public authorities.

### **Additional information**

Further information in relation to the processing of personal data may be requested at any time to the Data Controller using the contact information.

### **Changes to this privacy policy**

The Data Controller reserves the right to make changes to this privacy policy at any time by giving notice to users on this page. Please consult this page often. In case of non-acceptance of changes made to this privacy policy, the user is required to cease using the sites hosted on Forge Fedriga domains, as well as being entitled to request the Data Controller to remove his/her own personal data. Unless otherwise specified, the previous privacy policy will continue to apply to personal data collected until that moment.