

# Privacy Policy

## Pursuant to Article 13 of Regulation (EU) 2016/679 on the protection of personal data

**Alphamac S.r.l.** (hereinafter also "**Alphamac**" or "**Company**") informs you, pursuant to Article 13 of Regulation (EU) 2016/679 on the protection of personal data ("**GDPR**"), that the personal data you provide through the use of the website *www.alphamac.it* (hereinafter "**Site**" or "**Website**"), may be subject to processing, in compliance with the obligations of confidentiality provided for by the regulations in force.

### 1. Data Controller:

The Data Controller, i.e., the person who makes the decisions regarding the purposes and methods of data processing, is Alphamac S.r.l., P. IVA 03772271205, with headquarters at Via Rinascita 25, 40064 Ozzano dell'Emilia (BO).

The Company has appointed a Data Protection Officer ("**DPO**") who can be contacted for clarification regarding the processing of personal data at the following address: DATAPROTECTIONIT@ima.it.

### 2. Categories of data processed:

Depending on the service you requested by accessing the Site, Alphamac may process personal data of different types:

- **Navigation data:** the computer systems and software used for the operation of this website acquire, in the course of their normal operation, certain personal data whose transmission is implicit in the navigation of the websites. This information is not collected to be associated with identified data subjects; however, by its very nature it could, through processing and association with data held by third parties, allow users to be identified. They include IP addresses or domain names of the computers used by users who connect to the site, URL addresses of the resources requested, the time of the request, the method used in submitting 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 and other parameters relating to the operating system and platform used by the user. The above data are used for the sole purpose of obtaining anonymous statistical information on the use of the site and to check its correct operation; they are deleted after processing. The data could be used to ascertain responsibility in case of hypothetical computer crimes against the site: except for this eventuality, at present the data on web contacts do not persist for more than seven days.
- **Personal data provided voluntarily:** the Company will process the personal and contact data you provide through the website, or by e-mail or other means of electronic and non-electronic communication. Specifically, the Company may process your personal data essential for identification, such as but not limited to: first and last name, social security number, addresses (email and/or PEC) employer company, telephone number, role and/or company classification. The Company will process the data communicated by you in compliance with applicable regulations, assuming that they refer to you or to third parties who have expressly granted you the authorization to give them on the basis of a suitable legal basis legitimizing the processing of the data in question;

- **Cookies:** for more information on the collection and processing of Cookies on this site, please refer to the specific Cookie Policy, which is also always available via a link located in the footer of each page.

### *Updating Data*

At any time, you will be able to ensure that the Personal Data processed for the purposes set out in this policy is correct and, in the event of any changes to the same, you may, likewise, request an update of the same by sending an email to: [info.alphamac@ima.it](mailto:info.alphamac@ima.it) or by accessing your user profile on the site.

### **3. Purposes and methods of processing, legal bases:**

Alphamac's processing of your personal data will be based on the principles of fairness, lawfulness, transparency and protection of your privacy and rights, in accordance with the principles expressed by the GDPR. Your personal data will be processed exclusively for purposes related and/or instrumental to the services you have requested, in particular:

- a) ensure the proper operation of the Site;
- b) enter into a sales contract for the purchase of one of our products, perform a service, including any registration with our Site, or one or more transactions requested by you;
- c) fulfill **any legal and/or regulatory obligations** (e.g., billing, bookkeeping);
- d) to carry out the operational and managerial requirements internal to Alphamac and inherent to the services and/or products offered to you;
- e) **to carry out soft spam campaigns**, i.e. to send commercial communications relating to products or services similar to those already the subject of existing business relationships with the Company (if any).

The above treatments, are made legitimate by the following legal bases:

- art. 6, par. 1 lett. b) of the GDPR - the processing is necessary for the performance of a contract or the execution of pre-contractual measures taken at your request - with reference to lett. b) above;
- Article 6(1)(c) of the GDPR - processing is necessary for compliance with a legal obligation to which the controller is subject - with reference to (c) above;
- art. 6, par. 1 lett f) of the GDPR - processing is necessary for the pursuit of the legitimate interest of the data controller - with reference to (a) (d) and (e) above;

The processing of the aforementioned data will take place by means of instruments suitable to guarantee their security as well as confidentiality and may be carried out by automated tools suitable to store, manage and transmit the data.

The processing of your Personal Data is carried out by means of the operations indicated in Article 4, No. 2), GDPR and namely: collection, recording, organization, structuring, updating, storage, adaptation or modification, extraction and analysis, consultation, use, communication by transmission, comparison, interconnection, limitation, deletion or destruction.

Alphamac guarantees the logical and physical security of the data and, in general, the confidentiality of the personal data processed, putting in place all the necessary technical and organizational measures appropriate to prevent the loss of personal data, illicit or otherwise incorrect use thereof, as well as unauthorized access by third parties.

#### **4. Nature of the provision of data and consequences of any refusal to respond:**

The provision of your personal data for the purposes referred to in Article 3, lett. a), b), c) and d), above, is necessary in order to take advantage of the services made available on our Site (i.e. purchase goods through the e-commerce service; registration on the site).

The provision of your personal data for the purposes referred to in Article 3 (e) is optional, with the consequence that you can decide to exercise your right to object at any time. Therefore, in case you exercise your right to object to the processing on your data (with reference to the processing carried out for soft spam purposes), it will not be possible for Alphamac to carry out the aforementioned activities.

#### **5. Data Retention Times:**

Your personal data will be kept for the amount of time strictly necessary to pursue the purposes of the processing for which it was collected, as indicated in Article 3 above.

In particular, the data collected for the purposes referred to in letters b), c) and d) will be kept for the time necessary to provide you with the requested services; it is understood that the data necessary to fulfill legal obligations (such as bookkeeping), will be kept for a period of 10 years from the termination of the existing business relationship, as provided for in Article 2220 of the Civil Code.

In addition, the Company reserves the right to retain your data for longer periods than those indicated above, should it be necessary for the resolution of litigation or judicial findings.

#### **6. Communication of data:**

Your Personal Data will not be disclosed or transferred to third parties. The Company, for the purposes set forth in Article 3 above, may make your Personal Data available:

- to its employees and collaborators, who will act in their capacity as authorized data processors (or so-called "data processors") and/or to consultants engaged by the Data Controller who need to process your Personal Data in order to perform their duties;
- to third parties who perform outsourced activities on behalf of the Data Controller by providing specific services as Data Processors pursuant to Article 28 GDPR. For information on the names and related references of the Data Processors, you may contact us at the following address: [info.alphamac@ima.it](mailto:info.alphamac@ima.it) or by mail at the Company's registered office;
- to judicial or supervisory authorities, administrations, public bodies and entities (domestic and foreign), in accordance with the provisions of the law and upon formal legitimate request by such entities.

Personal Data will not be transferred outside the European Union.

#### **7. Rights of the data subject:**

In relation to your Personal Data you may exercise, at any time, the rights recognized by the GDPR, set out below:

- **access to Personal Data ex art. 15:** to obtain confirmation as to whether or not data concerning you is being processed and, if so, access to the following information: the purposes, the categories of data, the recipients, the retention period, the right to lodge a complaint with the Supervisory

Authority, the right to request rectification or cancellation or restriction of processing or opposition to the processing itself as well as the existence of an automated decision-making process;

- **request for rectification of Personal Data ex art. 16:** obtain, without undue delay, the rectification of inaccurate Personal Data concerning you and the possible integration of the same if incomplete;
- **deletion of Personal Data ex art. 17:** obtain, without undue delay, the deletion of Personal Data concerning you;
- **limitation of processing ex art. 18:** "limitation" means the marking of the data stored with the aim of limiting its processing in the future, this will result in the Company's obligation to suspend the processing of your Personal Data;
- **data portability ex art. 20:** in the case of automated processing carried out on the basis of consent or in performance of a contract, to receive in a structured, commonly used and machine-readable format the data concerning you;
- **objection to processing ex art. 21:** object to the processing of your Personal Data, unless there are reasons of legitimate interest of the Data Controller to continue the processing. You also have the right to object to processing where your Personal Information is used for direct marketing purposes;
- **object to automated decision making, including profiling ex art. 22,** your Personal Information shall not be subject to any automated decision making by Alphamac through the use of your Personal Information or profiling, unless you consent;

The Company also informs you that you can lodge a complaint under Article 77 with the competent Supervisory Authority (e.g., that of the State where you have your habitual residence, that of your place of work, or that of the place where your rights are violated). For Italy, the competent authority is the Garante per la protezione dei dati personali, which can be contacted through the contact details given on the website <http://www.garanteprivacy.it/>.

The aforementioned rights may be exercised by sending a request to us by e-mail, to [info.alphamac@ima.it](mailto:info.alphamac@ima.it), or by registered mail to the Company's registered office.

Requests regarding the exercise of rights will be processed without undue delay and, in any case, within 30 days of receipt of the request.

Finally, it should be noted that the Company may amend or update this notice, including to comply with new obligations imposed by applicable laws or for technical necessity.