

Privacy Policy

This document describes the management of this website, with respect to the processing of personal data of users who consult it. Information will be provided about the type of data collected and the intervention options available to the user regarding the methods of collection and the purpose of using such information.

This information is provided pursuant to art. 13 and 14 of the EU General Data Protection Regulation (GDPR) 2016/679, to any entity interacting with Rampinelli S.p.A.'s website: www.rampinelli.eu (the "Site"), URL corresponding to the initial page of the company's website.

The information is provided solely for the aforementioned website, and not for other sites that may be consulted by the user through links.

The user is invited to read this Privacy Policy carefully, before submitting personal information and/or completing any electronic form relating to the website.

Data Controller

The Data Controller is Rampinelli S.p.A. (the "Controller"), base in via Provinciale 104, 24021 Albino (BG) and P.Iva: IT00222570160.

Data Processor

The Data Processor is the legal representative of the company, domiciled for the charge at the offices of Rampinelli S.p.A. in via Provinciale 104, 24021 Albino (BG).

Types and Use of the Collected Data

This Site collects some personal data of users who visit it. It can also collect some personal data of the subjects who expressly fill out forms and/or adhere to the initiatives offered by the Site itself.

Personal Data includes identification, contact details, navigation, and any choices made through the site (the "Data"). These are provided by the interested party (the "User") or collected automatically by this Site, also through automated systems, and are processed for the purposes and according to the methods set out in this statement.

The main types of Data processed by the Site are listed as follows, in addition to information on the purposes and treatment methods of the same.

1 Navigation Data

The IT systems and software procedures used to operate the Site acquire, during their normal operation, some User Data. The transmission of such Data is implicit in the use of internet communication protocols.

This category of Data includes IP addresses or domain names of the computers used by the User that connects to the Site, addresses in the URI (Uniform Resource Identifier) notation of the requested resources, 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 related to the operating system and the computer environment used by the User. The use of these Data is limited to the sole purpose of obtaining anonymous statistical information on the use of the Site and to check the correct functioning of the same. Data is deleted immediately after processing.

These Data could, through processing and association with data held by third parties, allow the identification of the User, although they are not information collected to be associated with identified subjects.

In the event of an offense committed against the Site, this type of Data could also be used to ascertain responsibility, at the request of the supervisory bodies in charge.

2 Data Voluntarily Provided by the User

If the User, visiting the Site, sends his/her Personal Data to access certain services, or proceeds with the optional, explicit, and voluntary sending of e-mails to the addresses indicated on this Site, Rampinelli S.p.A. will proceed with the acquisition of the sender's address and / or other personal data, which will be taken exclusively to respond to requests, or for the provision of the service.

The Personal Data provided by the User will be communicated to third parties only if this is necessary to comply with the User's requests.

Specific summary information will be progressively reported or displayed on the pages of the Site prepared for particular services on request.

3 Cookies

No User data is acquired by the Site in this regard. Furthermore, cookies are not used for the transmission of strictly personal information.

For more information on this matter, please refer to the Cookie Policy of Rampinelli S.p.A., at the following link: <http://rampinelli.eu/terms-conditions/>.

Mode of Processing the Data

The Data Controller processes the User's Personal Data in a lawful and correct manner, adopting the appropriate security measures aimed at preventing loss, illicit or incorrect use and unauthorized access. The processing is carried out through IT tools, even automated, with organizational and logical methods related to the purposes indicated.

Optional Data Provision

Depending on the specific characteristics of the Site, the Navigation Data, which contribute to the technical functioning of the same, are necessarily collected, without requesting the User's consent. Failure to acquire such Data will make it impossible to use the services offered by the Site.

For all other types of Data, the User is free to provide his/her Personal Data asked in the request forms to subscribe to the newsletter, to request other informative material or other communications. It should be noted that failure to provide certain Data could make it impossible to access the requested service.

In the event that the User provides, by his/her choice, Data referring to third parties, relieves the Site from any responsibility for their treatment for purposes instrumental to the services offered by the Site.

Part Reserved to Minors

No person under the age of 18, without prior consent of their parents or guardians, may send information or Personal Data to this Website.

Rights of Users

Pursuant to art. 13 and 14 of the EU General Data Protection Regulation (GDPR) 2016/679, a list of the rights of the data subject is presented below.

Section 2 **Information and access to personal data**

Article 15 **Right of access by the data subject**

1. The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information: a) the purposes of the processing; b) the categories of personal data concerned; c) the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations; d) where possible, the envisaged period for which the

personal data will be stored, or, if not possible, the criteria used to determine that period; e) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing; f) the right to lodge a complaint with a supervisory authority; g) where the personal data are not collected from the data subject, any available information as to their source; h) the existence of automated decision-making, including profiling, referred to in Article 22 (1) and (4) and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

2. Where personal data are transferred to a third country or to an international organization, the data subject shall have the right to be informed of the appropriate safeguards pursuant to Article 46 relating to the transfer.
3. The controller shall provide a copy of the personal data undergoing processing. For any further copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs. Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form.
4. The right to obtain a copy referred to in paragraph 3 shall not adversely affect the rights and freedoms of others.

Section 3 **Rectification and erasure**

Article 16 **Right to rectification**

1. The data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

Article 17 **Right to erasure ('right to be forgotten')**

1. The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies: a the personal data are no longer necessary in relation to the purposes for which they were collected

or otherwise processed; b) the data subject withdraws consent on which the processing is based according to point (a) of Article 6(1), or point (a) of Article 9(2), and where there is no other legal ground for the processing; c) the data subject objects to the processing pursuant to Article 21(1) and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2); d) the personal data have been unlawfully processed; e) the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject; f) the personal data have been collected in relation to the offer of information society services referred to in Article 8(1).

2. Where the controller has made the personal data public and is obliged pursuant to paragraph 1 to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers which are processing the personal data that the data subject has requested the erasure by such controllers of any links to, or copy or replication of, those personal data.
3. Paragraphs 1 and 2 shall not apply to the extent that processing is necessary: a) for exercising the right of freedom of expression and information; b) for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller; c) for reasons of public interest in the area of public health in accordance with points (h) and (i) of Article 9(2) as well as Article 9(3); d) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) in so far as the right referred to in paragraph 1 is likely to render impossible or seriously impair the achievement of the objectives of that processing; or e) for the establishment, exercise or defence of legal claims.

Article 18 Right to restriction of processing

1. The data subject shall have the right to obtain from the controller restriction of processing where one of the following applies: a) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data; b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead; c) the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims; d) the data subject has objected to

processing pursuant to Article 21(1) pending the verification whether the legitimate grounds of the controller override those of the data subject.

2. Where processing has been restricted under paragraph 1, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.
3. A data subject who has obtained restriction of processing pursuant to paragraph 1 shall be informed by the controller before the restriction of processing is lifted.

Article 20 **Right to data portability**

1. The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where: a) the processing is based on consent pursuant to point (a) of Article 6(1) or point (a) of Article 9(2) or on a contract pursuant to point (b) of Article 6(1); and b) the processing is carried out by automated means.
2. In exercising his or her right to data portability pursuant to paragraph 1, the data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.
3. The exercise of the right referred to in paragraph 1 of this Article shall be without prejudice to Article 17. That right shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.
4. The right referred to in paragraph 1 shall not adversely affect the rights and freedoms of others.

Section 4 **Right to object and automated individual decision-making**

Article 21 **Right to object**

1. The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on point (e) or (f) of Article 6(1), including profiling based on those provisions. The controller shall no longer process the personal data unless the controller demonstrates compelling

legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

2. Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing.
3. Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.
4. At the latest at the time of the first communication with the data subject, the right referred to in paragraphs 1 and 2 shall be explicitly brought to the attention of the data subject and shall be presented clearly and separately from any other information.
5. In the context of the use of information society services, and notwithstanding Directive 2002/58/EC, the data subject may exercise his or her right to object by automated means using technical specifications.
6. Where personal data are processed for scientific or historical research purposes or statistical purposes pursuant to Article 89(1), the data subject, on grounds relating to his or her particular situation, shall have the right to object to processing of personal data concerning him or her, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

For any doubts about the compliance with the Privacy Policy adopted by Rampinelli SpA, its application, the accuracy of Personal Data or the use of the information collected, you can contact the company at the following e-mail address: info@rampinelli.eu.