

PRIVACY POLICY

This section contains information on how ECOL STUDIO S.p.A. handles the processing of its Users' data on the pages of its domain.

The information is not provided for websites that may be consulted via links present on the site.

This information is prepared in accordance with Article 13 of EU Regulation 2016/679 (GDPR), for persons interacting with ECOL STUDIO S.p.A. through its page: www.ecolstudio.com.

The purpose of this document is to provide information on the methods, timing and nature of the information that the Data Controllers must provide to Users when connecting to the web pages of ECOL STUDIO S.p.A., regardless of the purposes of the connection itself, according to Italian and European legislation.

The information may undergo changes due to the introduction of new rules in this regard, or changes and additions to those currently in force, so you are invited to check this page even though ECOL STUDIO SpA undertakes to inform of any significant changes.

In the event that the User is under the age of 16, pursuant to Article 8 paragraph 1 of EU Regulation 2016/679, the authorization of parents or guardians will be required for the purpose of legitimizing their consent to the processing of data communicated.

It is specified that within the site, there are also other points of collection of personal data by the Controller. In relation to the processing connected with the provision of the relative services, for what is not contained in this general information document, reference is made to the specific information found after the various links.

✓ **DATA CONTROLLER**

The Data Controller is the natural or legal person, public authority, service or other body that individually also deals with security profiles.

The Controller of this site is ECOL STUDIO S.p.A. in the person of its legal representative *pro tempore*, Claudio Fornari, with registered office in Viale S. Michele del Carso, 4-20144 (Milano, Italy) and operational offices in:

- ✓ Via dei Bichi, 293-293B- 55100 (Lucca)
- ✓ Via G.Tovani, 18 / b -55022 Fornoli – Bagni di Lucca (Lucca)
- ✓ Via Industria 57023, Cecina (Livorno)
- ✓ Via Francesco Petrarca 23, 20851 Lissone (Monza and Brianza)
- ✓ Via Sansovino, 217 10151 (Torino)
- ✓ Via Austria 25 / B, 35127 - (Palermo)
- ✓ Via Selvuzzis 53, 33100 - (Udine)
- ✓ Via Bologna, 1 48027 Solarolo, (Ravenna)

✓ **PERSONAL DATA OBJECT OF THE PROCESSING**

a) Browsing data

The information systems and software procedures relied upon to operate this website acquire personal data as part of their standard functioning; the transmission of such data is an inherent feature of Internet communication protocols.

It is information which is not collected to be associated with identified data subjects, but that by its nature could, through processes and associations with data held by third parties, allow the Users' identification.

This data category includes the IP addresses and/or the domain names of the computers and terminal equipment used by any User. Part of this category of data is the URI (Uniform Resource Identifier) addresses of the requested resources, the time of such requests, the method used for submitting a given request to the server, returned file size, the numerical code relating to server response status (successfully performed, error, etc.), and other parameters related to the User's operating system and computer environment.

These data are used solely for the purpose of extracting statistical information on use of the site and to check the correct functioning of the services.

The data could be used for ascertaining liability in the event of alleged cybercrime to the detriment of the site: with the exception of this case, at present data regarding website contacts are not kept for more than 30 days.

b) Data provided voluntarily by the User

The optional, explicit and voluntary forwarding of electronic mail to the address indicated on this site implies the subsequent acquisition of the address of the sender, necessary for responding to requests, as well as any other personal data included in the message.

These data will be used in order to **allow the provision of the service** requested and implement the strictly connected and instrumental operations (if any), including the acquisition of further preliminary information. They may also be used for the fulfilment of the obligations established by law (e.g. compliance with transparency, anti-corruption) or by an order of the Authorities and for the exercise of the rights of the Controller (e.g. right of defence in court).

ECOL STUDIO S.p.A.

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Rev.2 del 01-12-2018



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A further purpose of using spontaneously provided personal data is represented by the **newsletter service** of Ecol Studio, only on explicit request by the User through the relative format or by issuing consent to the processing of data for commercial/marketing and promotional purposes.

c) Personal data belonging to particular categories of data

The **data spontaneously conferred by the User in the "work with us" section** may belong to particular categories of data (so-called sensitive data). These will be used only for the period strictly necessary for the evaluation of the application and solely for the purpose of personnel selection.

Complete information concerning the processing of personal data contained in the curriculum vitae can be found at the following link <https://www.ecolstudio.com/en/jobs-en.html>

d) Cookies

Cookies

None of the Users' personal data will be purposely acquired by this website.

We do not use cookies to transmit personal information, nor do we use any type of the so-called "persistent cookies", i.e. systems to trace the Users.

The use of what are known as session cookies (which are not stored permanently on the User's computer and disappear when you close your browser) is strictly limited to the transmission of session identifiers (consisting of random numbers generated by the server), which are necessary to allow the User to browse the website safely and efficiently.

The session cookies used on this website avoid using other computer techniques, which could be potentially prejudicial for your browsing privacy and do not allow the User's personal identification data to be acquired.

✓ **PLUGINS**

This site incorporates plugins for social networks in order to allow a redirection to the related social media pages. These plugins are programmed so as not to set any Cookies when Users access the page in order to safeguard the privacy of Users. Cookies may be set only when the User makes effective and voluntary use of the plugin. Please note that if the User browses the website while logged on to the social network, then they have already given consent to the utilization of Cookies conveyed through this Website at the time of registration to the social media network.

The collection and utilization of the data obtained by means of the plugins are regulated by the respective Privacy Policies of the social media networks, for which please refer to:

- https://www.linkedin.com/legal/privacy-policy?trk=organization-guest_footer-privacy-policy
- <https://www.facebook.com/privacy/explanation>
- <https://www.twitter.com/it/privacy>

✓ **PURPOSES, LEGAL BASIS OF THE PROCESSING**

Regarding the personal data mentioned in letter a) of this information document, your personal data are processed automatically by Ecol Studio S.p.A. in order to allow browsing. In this case, the processing takes place pursuant to law obligations, as well as on the basis of the legitimate interest of the above-mentioned companies to guarantee proper functioning and security of the web site; hence, your express consent is not necessary.

With regard to the personal data referred to in letters b) & c) of this information document, the processing is carried out in order to provide you with accurate feedback; in this case the processing is based on the execution of a request made by you; therefore, your express consent is not necessary.

✓ **NATURE OF DATA CONFERRAL**

Without prejudice to the terms specified for the browsing data for which conferral is mandatory because instrumental to browsing on Ecol Studio S.p.A.'s website, you are free to provide your personal data in order to receive information from the above-mentioned company, the evaluation of your CV or the subscription to our newsletter service.

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✓ **PROCESSING METHODS**

The processing of personal data is carried out through the use of automated tools with reference to access data to the pages of the website.

The processing of personal data takes place in full compliance with the provisions aimed at ensuring the security and confidentiality, as well as the accuracy, updating and relevance of personal data with respect to the stated purposes.

The above is processed in automated form and collected exclusively in order to verify the proper functioning of the site and for security reasons. This information will be processed only on the basis of the legitimate interests of ECOL STUDIO S.p.A.

For security purposes, the automatically recorded data may possibly also include personal data such as the IP address, which could be used in accordance with applicable laws, in order to block attempts to damage the site or to harm other Users, as well as to prevent acts constituting an offense.

However, such identification data are never used for User identification or profiling, but only for the protection of the site and of its Users. This information will be processed according to the legitimate interests of the Data Controller.

The information that Users of the Website deem to make public through the services and tools rendered available to them, is provided by the User knowingly and voluntarily, exempting this Website from all liability regarding violation, if any, of laws.

It is up to the User to verify that they have permission to provide the personal data of third parties or content protected by national and international regulations.

✓ **DATA RETENTION PERIOD**

The processing of personal data takes place for the time strictly necessary to achieve the purposes for which they were collected or otherwise based on the deadlines required by law.

Specific security measures are observed in order to prevent data loss, illicit or incorrect use, and unauthorized access.

When the processing is based on the User's consent, the Controller may retain Personal Data for longer, until such consent is revoked. In addition, the Data Controller may be required by law or by order of an Authority to retain Personal Data for a longer period of time.

At the end of the retention period the Personal Data will be deleted.

Therefore, upon expiry of this term, the right of access, removal, rectification and the right to portability of the Data may no longer be exercised.

✓ **RECIPIENTS OF PERSONAL DATA**

Notwithstanding the communications sent to fulfil legal obligations, your personal data may be disclosed, as subjects authorised for data processing, to the subjects involved in the organization (administrative staff, legal staff, system administrators) or external subjects (as suppliers of third party technical services, couriers, hosting providers, IT companies, communication agencies) also appointed, if necessary, as Data Processors by the Data Controller.

The updated list of Data Protection Officers can be requested from the Data Controller.

✓ **RIGHTS OF DATA SUBJECTS**

- The Regulation confers you the exercise of the specific rights listed below:
 - confirmation as to whether or not personal data concerning you exist, and if so, to have access to them (right of access by the data subject) Art. 15;
 - rectification of inaccurate data or the integration of incomplete personal data (right to rectification) Art.16;
 - cancellation of the data, if one of the reasons set forth in the Regulation exists (right to be forgotten) Art.17;
 - restriction of processing when one of the hypotheses set forth in the Regulation exists (right to restriction) Art.18;
 - receive the personal data provided by you to the Controller in a structured, commonly used and machine-readable format, and to transmit such data to another Data Controller (right to data portability) Art.20;
 - objection to the processing of personal data (right to object) Art.21;
 - the right not to be subjected to a decision based solely on automated processing, including profiling (automated individual decision-making, including profiling) Art. 22.

✓ **EXERCISING USERS' RIGHTS**

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Informativa Privacy

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To exercise the rights to the processing of your personal data, you can send a request to the Data Controller, ECOL STUDIO S.p.A., in the person of its legal representative *pro tempore* Claudio Fornari, by mail to the address: Via dei Bichi, 293-293 B -55100 (Lucca, Italy) or to the e-mail address: info@ecolpec.com.

✓ **COMPLAINTS PROCEDURE**

Without prejudice to any other action in administrative and judicial proceedings, the Data Controller has the right to lodge a complaint with the competent supervisory authority: www.garanteprivacy.it.

✓ **AMENDMENTS TO THE DOCUMENT**

The present document constitutes the privacy policy of this website. It may be subject to changes, updates and additions. Should these constitute significant changes, will be notified to Users.

This document was updated on 27 November 2018 to comply with the relevant regulations, and in particular in compliance with EU Regulation 2016/679 and with Italian Legislative Decree 101/2018.

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