

# PRIVACY POLICY

## I. INFORMATION RELATED TO THE PRIVACY POLICY OF THE SITE

1. This section contains information on how to manage Ing4Tech with reference to the processing of Ing4Tech users' data.
2. This information is also valid for the purposes of art. 13 of Legislative Decree no. 196/2003, Code for the protection of personal data, and for the purposes of article 13 of EU Regulation no. 2016/679, on the protection of individuals with regard to the processing of personal data and the free movement of such data, for persons who interact with Ing4Tech and is reachable at the address corresponding to the home page: <http://www.ing4tech.it/>.
3. The information is provided only for Ing4Tech and not for other websites that may be consulted by the user through links contained therein.
4. The purpose of this document is to provide information about the manner, timing and nature of the information that data controllers must provide users when connecting to Ing4Tech's web pages, regardless of the purpose of the link itself, according to Italian and European legislation.
5. The information may be subject to change due to the introduction of new rules in this regard, we therefore invite the user to check this page periodically.
6. If the user is under 16 years of age, according to art.8, c.1 EU regulation 2016/679, he must legitimize his consent through the authorization of his parents or his substitute.

## II. DATA PROCESSING

### 1. Data Controller

1. The data controller shall be the natural or legal person, public authority, agency or other body which alone or jointly with others determines the purposes and means of the processing of personal data. It shall also deal with security profiles.
2. With regard to this website, the data controller is: Ing4Tech Srl, and for any clarification or exercise of the user's rights, you may contact him at the following e-mail address: [info@ing4tech.it](mailto:info@ing4tech.it)

### 2. Responsible for data processing

1. The controller shall be the natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.
2. In accordance with Article 28 of EU Regulation No 2016/679, upon appointment of the data controller, the data controller of the Ing4Tech site shall be: Roberto Palumbo.

### 3. Place of data processing

1. The data processing generated by the use of Ing4Tech takes place at: Via degli Armaioli 5.
2. If necessary, the data connected to the newsletter service may be processed by the data controller or subjects appointed by him for this purpose at the relevant office.

### **III. COOKIES**

#### **1. Type of Cookies**

1. The Ing4Tech website uses cookies to make the user's browsing experience easier and more intuitive: cookies are small text strings used to store certain information that may relate to the user, his/her preferences or the Internet access device (computer, tablet or mobile phone) and are mainly used to adapt the operation of the site to the user's expectations, offering a more personalized browsing experience and storing the choices made previously.
2. A cookie consists of a small set of data transferred to the user's browser by a web server and can only be read by the server that made the transfer. It is not executable code and does not transmit viruses.

Cookies do not record any personal information and any identifiable data will not be stored. If you wish, you can prevent the storage of some or all cookies. However, in this case the use of the site and the services offered may be compromised. To proceed without changing the options for cookies, simply continue browsing.

The following are the types of cookies used by the site:

#### **2. Technical Cookies**

1. There are many technologies used to store information on your computer, which are then collected by the sites. Among these, the most widely known and used is HTML cookies. They are used for navigation and to facilitate access and use of the site by the user. They are necessary for the transmission of communications over an electronic network or to the provider to provide the service requested by the customer.
2. The settings for managing or disabling cookies may vary depending on your internet browser. However, the user can manage or request the general deactivation or deletion of cookies by changing the settings of their Internet browser. Such deactivation may slow down or prevent access to certain parts of the site.
3. The use of technical cookies allows the safe and efficient use of the site.
4. Cookies that are placed in your browser and retransmitted through Google Analytics or through the statistical service of bloggers or similar are technical only if used for the purpose of optimizing the site directly by the owner of the site, which may collect information in aggregate form on the number of users and how they visit the site. Under these conditions, cookies analytics are subject to the same rules on information and consent as technical cookies.
5. From the point of view of duration we can distinguish temporary session cookies that are automatically deleted at the end of the browsing session and serve to identify the user and thus avoid the login to each page visited and the permanent ones that remain active in the PC until expiration or deletion by the user.
6. Session cookies may be installed in order to allow access and stay in the reserved area of the portal as authenticated user.
7. They are not stored permanently but exclusively for the duration of navigation until the browser is closed and disappear when the browser is closed. Their use is strictly limited to the transmission of session identifiers consisting of random numbers generated by the server necessary to allow safe and efficient exploration of the site.

## **IV. DATA TREATED**

### **1. Data processing mode**

1. Like all websites, this site also uses log files in which information collected automatically during user visits is stored. The information collected may be as follows:
  - - Internet protocol (IP) address;
  - - type of browser and parameters of the device used to connect to the site;
  - - name of the internet service provider (ISP);
  - - date and time of visit;
  - - web page of the visitor's origin (referral) and exit;
  - - possibly the number of clicks.
2. The above information is processed automatically and collected exclusively in aggregate form in order to verify the proper functioning of the site, and for security reasons. This information will be processed according to the legitimate interests of the owner.
3. For security purposes (spam filters, firewalls, virus detection), automatically recorded data may 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 itself or to cause damage to other users, or otherwise harmful activities or constitute a crime. Such data are never used for the identification or profiling of the user, but only for the protection of the site and its users, such information will be processed according to the legitimate interests of the owner.
4. If the site allows the inclusion of comments, or in the case of specific services requested by the user, including the possibility of sending the Curriculum Vitae for a possible employment relationship, the site automatically detects and records some identification data of the user, including the email address. These data are intended to be voluntarily provided by the user at the time of the request to provide the service. By entering a comment or other information, the user expressly accepts the privacy policy, and in particular agrees that the contents entered are freely disclosed to third parties. The data received will be used exclusively for the provision of the service requested and only for the time necessary for the provision of the service.
5. The information that users of the site believe to make public through the services and tools made available to them, are provided by the user knowingly and voluntarily, exempting this site from any liability for any violation of laws. It is up to the user to verify that he/she has permission to enter personal data of third parties or content protected by national and international regulations.

### **2. Purpose of data processing**

1. The data collected by the site during its operation are used exclusively for the purposes indicated above and kept for the time strictly necessary to carry out the activities specified, and in any case no later than 1 year.
2. In any case, the data collected by the site will never be provided to third parties, for any reason, unless it is a legitimate request by the judicial authorities and only in the cases provided for by law.
3. The data used for security purposes (blocking attempts to damage the site) are kept for the time strictly necessary to achieve the purpose previously indicated.

### **3. Data provided by the user**

1. As indicated above, the optional, explicit and voluntary sending of electronic mail to the addresses indicated on this site involves the subsequent acquisition of the sender's address, necessary to respond to requests, as well as any other personal data included in the message.
2. Specific summary information will be progressively reported or displayed on the pages of the site set up for particular services on request.

#### 4. Support in configuring your browser

1. You can also manage cookies through your browser settings. However, deleting cookies from your browser may remove the preferences you have set for the site.
2. For more information and support you can also visit the specific help page of the web browser you are using:
  - Internet Explorer: <http://windows.microsoft.com/en-us/windows-vista/block-or-allow-cookies>
  - Firefox: <https://support.mozilla.org/en-us/kb/enable-and-disable-cookies-website-preferences>
  - Safari: <http://www.apple.com/legal/privacy/it/>
  - Chrome: <https://support.google.com/accounts/answer/61416?hl=it>
  - Opera: <http://www.opera.com/help/tutorials/security/cookies/>

#### V. USER RIGHTS

1. Article 13, paragraph 2 of EU Regulation 2016/679 lists the rights of the user.
2. The Ing4Tech site therefore intends to inform the user of its existence:
  - the right of the data subject to request the data controller to have access to his or her personal data (art. 15 EU Regulation), to have it updated (art. 7, par. 3, letter a) of Legislative Decree 196/2003), to have it rectified (art. 16 EU Regulation), to have it supplemented (art. 7, par. 3, letter a) of Legislative Decree 196/2003) or to limit the processing of his or her personal data (art. 18 EU Regulation) or to object, on legitimate grounds, to its processing (art. 21 EU Regulation), in addition to the right to data portability (art. 20 EU Regulation), in addition to the right to object to the processing of his or her personal data (art. 20 EU Regulation);
  - the right to request cancellation (art. 17 EU Regulation), transformation into anonymous form or blocking of data processed unlawfully, including data whose retention is unnecessary for the purposes for which the data were collected or subsequently processed (art. 7, par. 3, letter b) Legislative Decree no. 196/2003);
  - the right to obtain certification that the operations of updating, rectification, integration of data, cancellation, blocking of data, transformation have been brought to the attention, including as regards their content, of those to whom the data were communicated or disseminated, unless this requirement proves impossible or involves a manifestly disproportionate to the protected right (art. 7, paragraph 3, letter. c) Legislative Decree no. 196/2003).
3. Requests can be addressed to the data controller, without formalities or, alternatively, using the form provided by the Guarantor for the Protection of Personal Data, or by sending an email to the address: [info@ing4tech.it](mailto:info@ing4tech.it)
4. If the processing is based on Article 6(1)(a) - express consent to the use - or on Article 9(2)(a) - express consent to the use of genetic, biometric, health-related data revealing religious or philosophical beliefs or trade union membership, revealing racial or ethnic origin, political opinions - the user has the right to withdraw consent at any time without prejudice to the lawfulness of the processing based on the consent given before the withdrawal.
5. Likewise, in case of violation of the law, the user has the right to lodge a complaint with the Guarantor for the Protection of Personal Data, as the authority responsible for monitoring the processing in the Italian State.
6. For a more detailed examination of your rights, see Articles 15 et seq. of EU Regulation 2016/679 and Article 7 of Legislative Decree no. 196/2003.

## **VI. SECURITY DATA PROVIDED**

1. This site processes user data in a lawful and correct manner, adopting appropriate security measures to prevent unauthorized access, disclosure, modification or unauthorized destruction of data. The processing is carried out by means of computer and/or telematic tools, with organizational methods and with logic strictly related to the purposes indicated.
2. In addition to the owner, in some cases, may have access to data categories of employees involved in the organization of the site (administrative staff, sales, marketing, legal, system administrators) or external parties (such as third-party technical service providers, couriers, hosting providers, computer companies, communication agencies).

## **VII. AMENDMENTS TO THIS DOCUMENT**

1. This document, published at: [http://www.ing4tech.it/en/pdf/privacy\\_policy](http://www.ing4tech.it/en/pdf/privacy_policy) constitutes the privacy policy of this site.
2. It may be subject to change or updating. In the case of significant changes and updates, these will be notified to users.
3. Previous versions of the document will still be available on this page.
4. The document was updated on 05/12/2018 to comply with the relevant regulatory provisions, and in particular in accordance with EU Regulation 2016/679.