

## Privacy Policy for website



### 1. Data Controller

**FECS Partecipazioni SpA**, with registered offices at Via Gramsci, 20, 24040 Verdellino (BG), Tax ID Code and VAT reg. no. 03244500165, hereinafter “Controller”, guarantees full compliance with data protection regulations, and provides the following information with regard to data processing, pursuant to Art. 13, EU Regulation 2016/679 (General Data Protection Regulation – GDPR) and subsequent amendments.



### 2. Data processed, purposes and legal grounds for processing

#### 2.1. Data generated from website access

During normal use, the computerised systems and processes put in place for the operation of the website acquire personal data, the transmission of which is implicit in the use of internet communication protocols.

The information collected may be the following:

- domain names;
- internet protocol (IP) address;
- operating systems used;
- browser type and device parameters used to connect to the site;
- origin website of the visitor (referral) and exit site.

The above information is processed automatically and collected in exclusively aggregate form in order to check the correct operation of the website as well as for safety reasons.

The legal basis that legitimises processing is the legitimate interest of the Controller.

#### 2.2. Data recorded for security purposes

For security purposes (spam filters, firewall, virus detection), the data automatically recorded may also include personal data such as IP address, which could be used, in line with current laws, in order to block

attempts to damage the website and to cause damage to other users or in any case, for harmful or unlawful activities. These data are never used to identify or profile the user, but only for the purposes of safeguarding the website and its users.

The legal basis that legitimises processing is the legitimate interest of the Controller.

### **2.3. Data provided voluntarily by the user via “contact” form**

Personal data provided by the user are collected and processed for the following purpose:

- a) for customer relations based on contract and/or pre-contract agreements;
- b) For administrative purposes and to fulfil legal obligations, such as, for example, accounting or fiscal obligations, or to meet requests from judicial authorities;
- c) in the presence of specific consent, for the regular delivery of hard copy post, telephone, email, sms or messaging apps regarding updates about our activities and information on product development, invitations to events, fairs, training courses, webinars, special promotions and list of used machinery and invitation to take part in surveys and market research;
- d) for the occasional delivery of mail concerning products already purchased or similar to same (so-called “soft spam”);
- e) in case of sending curriculum vitae, exclusively for selection purposes.

The legal basis for lawful processing:

- with regard to the purposes as stated in point 2.3 letters a), b) and e), it is the performance of a contract to which the data subject is party or the execution of pre contractual measures adopted at the request of same;
- with regard to the purposes as per point 2.3 letter c) it is the consent, freely given, of the data subject;
- with regard to the purposes as per point 2.3 letter d) it is the legitimate interest of the Controller.



### **3. Nature of provision**

Aside from that specified for browsing data and data collected via the WordPress platform, the provision of data:

- with regard to the purposes as per point 2.3 letter a), b) and g), it is optional but any refusal will involve the impossibility for the Controller to meet the contractual undertakings;

- with regard to the purposes as per point 2.3 letter c), it is also optional and the use of said data depends on explicit consent. Any refusal will prevent the Data Controller from sending newsletters and advertising material or invitations to Controller's events;
- with regard to the purposes as per point 2.3 letter d), it is also optional but any refusal will involve the impossibility for the Controller to send mail about products already purchased or similar.



#### **4. Processing locations and methods and data retention times**

Data collected from the website are processed at the headquarters of the Data Controller and at the data centres of the registrar Aruba S.p.A. regularly named as Data Processor. In the interests of completeness, we inform you that it is possible to find more information concerning the conformity to the GDPR of Aruba S.p.A. [here and here](#).

Data collected will be processed using electronic or in any case, automated or computerised or telematic means, or using manual processing with logic strictly related to the purposes for which said personal data were collected and, in any case, in such a way as to guarantee the security of same.

Data collected, included those pertaining to telematic traffic, are retained for the time strictly necessary to the purpose for which they were processed ("storage limitation principle", Art.5, EU Regulation 2016/679), or in compliance with the expiry set out in current standards or obligations set down by law. After the legally required retention period and unless otherwise indicated by the Authority with administrative or judicial provision, the abovementioned data will be destroyed and it will no longer be possible to obtain a copy of same.



#### **5. Authorised subjects, data processors and data communication**

The processing of data collected is performed by the Data Controller's internal staff, appointed for this purpose and authorised to perform processing according to specific instructions issued in compliance with current regulations.

The data collected, within the limits pertaining to the purposes of processing stated and in the event it is necessary or useful for the execution of said purposes, may be processed by third parties appointed as external Processors, i.e., according to cases, communicated to same as autonomous controllers and precisely:

- companies in our group for the purposes set out in point 2.3 letter a), b) and e);

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**Telefono**  
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**Email e PEC**  
info@fecs.it  
PEC fecspartecipazioni@legalmail.it

- people, companies, associations or professional firms providing assistance or consultancy to our company for the purposes stated in point 2.3 letters b) and e);
- companies, entities, and associations providing services connected and instrumental to the achievement of the above aims (surveys and market research, management of payments via credit card, maintenance of IT systems).

The data collected can be provided, in the event of lawful request, solely in the cases envisaged by law, by the Legal Authority.

Under no circumstances will your data be circulated in any way.



## 6. Data transfer to non-EU countries

Data can be transferred to non-EU countries and specifically, to the United States, only subsequent to checks of the Standard Contractual Clauses adopted/approved by the European Commission, pursuant to Art. 46, par. 2, lett. c) and d) of the GDPR or binding standards for the company as per Art. 47 of the GDPR or, if not, according to one of the derogating measures, as stated in Art. 49 of the GDPR.

The transfer to the United States is authorised according to the specific agreement known as the EU-US Data Privacy Framework (available at [here](#)), for which there is no further consent required.

It is possible to find information concerning the use of data and conformity to the GDPR at the following links:

- Google [here](#);
- LinkedIn [here](#) and [here](#);
- Google Analytics [here](#) and [here](#);



## 7. Data subject's rights

With regard to the personal Data communicated, the Data subject has the right to exercise the following rights:

- (Art. 7.3 Regulation EU 679/2016 – GDPR) withdrawal of consent;
- (Art. 15 Regulation EU 679/2016 – GDPR) accessing and asking for a copy;
- (Art. 16 Regulation EU 679/2016 – GDPR) requesting correction;

- d. (Art. 17 Regulation EU 679/2016 – GDPR) requesting deletion (“right to be forgotten”);
- e. (Art. 18 Regulation EU 679/2016 – GDPR) obtaining data minimisation;
- f. (Art. 20 Regulation EU 679/2016 – GDPR) receiving data in a structured format, commonly used and readable from an automatic device, for the purposes of exercising the right to portability;
- g. (Art. 21 Regulation EU 679/2016 – GDPR) opposing processing.

The data subject can exercise their rights as well as ask for more information about their Personal Data, by sending an email to [info@fecs.it](mailto:info@fecs.it) and specifying the content of their request in the subject line.

Requests concerning the Data subject’s choice to avail of their rights will be issued without undue delay and, in any case, within one month of the request; only in particularly complex cases and large number of requests, may this be extended by a further 2 (two) months.

Please remember that it is your right (as per art. 77 Regulation EU 679/2016 – GDPR) to submit a complaint to the Data Protection Authority, whose contact information is available [here](#)

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