

## **PRIVACY POLICY STATEMENT AND CONSENT TO PERSONAL DATA PROCESSING FOR [WWW.FLUIDFORCE.IT](http://WWW.FLUIDFORCE.IT) WEBSITE**

### **Data Controller**

The Data Controller is Fluid Force S.r.l. - Società del Gruppo Metal Work: Metal Work S.p.A., with registered office at 5/7/9 Via Segni, 25062 Concesio (Brescia), VAT number 03472820178, email: [info@metalwork.it](mailto:info@metalwork.it).

In addition, any partner's websites that from time to time take part in data processing activities on their own can take on the role of independent data controllers.

### **Scope**

#### 1) Browsing data

The computer systems and software procedures used to operate this website acquire, during normal operation, certain personal data which is then implicitly transmitted when using Internet communication protocols.

This is information which by its very nature could, through the processing and association with data held by third parties, allow users to be identified (e.g. IP addresses, domain names of computers used by users/visitors connecting to the websites, etc.).

This data is used solely for the purpose of acquiring statistical information and to verify the correct functioning of the website.

The data acquired on web contacts is not stored, however, for more than seven days, except for any investigations of cybercrimes against the website.

No data deriving from the web service will be disclosed or disseminated.

#### 2) Data voluntarily provided by users/visitors

If users/visitors connecting to this website send their personal data to access certain services or to make requests via e-mail or sending their CVs, they are aware that this involves the acquisition by the Data Controller of the sender's address and/or any other personal data that will be processed solely for the purpose of responding to the request or for the provision of the service.

Personal data provided by users/visitors will be disclosed to third parties only should this be necessary to fulfil the requests of said users/visitors or for legal obligations (e.g. billing or acquisition of data following the receipt of a CV).

#### 3) Cookies

In addition to data expressly provided to the Data Controller, other data may be recorded as a result of browsing the website by the user: when the user accesses it, a "cookie" can be sent to the user. A cookie is a small text file that the website automatically sends to the user's computer when our pages are viewed. Cookies are used to facilitate browsing the website, obtain information on each user browsing inside the website and allow proper fruition of some services that require identification of the user in order to know which areas of the website have been visited.

Regardless of the presence of a "cookie", for any access to the website, our website records the type of browser (e.g. Internet Explorer, Chrome, Firefox), the operating system (e.g. Windows, Macintosh) and the host and the URL from the user-navigator, in addition to the data entered in the request page. This data may be used in aggregate and anonymous form for statistical analysis on the use of the website. For the complete management of cookies, please refer to the "Cookie policy" "Cookie Policy" page of this website.

### **Processing methods**

Processing is performed using automated tools (e.g. electronic procedures and media) and/or manually (e.g. on paper) for the time strictly necessary to achieve the purposes for which the data was collected and, in any case, in compliance with applicable legislation.

### **Processing purposes**

In addition to the purposes specified in each disclosure preceding the filling out of the registration forms provided in the various sections of the website, the purposes of the processing by the Data Controller are to be understood as:

- a) the collection, storage and processing for the purposes of the establishment and operational and administrative management of the contractual relationship connected with the provision of the service offered on the website;
- b) the use of the user's personal data (namely the email address) to establish communications relating to the performance of the contractual relationship;
- c) the processing of personal data provided and those obtained from browsing the website in order to provide a service consistent with the information transmitted during the use of the service;
- d) the collection, storage and processing of data to perform statistical analyses in an anonymous and/or aggregate form;
- e) purposes connected with the conduction of our business, including the offering of personalised contents, such as newsletter services;
- f) the communication of commercial information on future initiatives, the announcement of new products or services;
- g) market surveys, statistical and economic analyses;
- h) the sending of advertising or promotional material, and the execution of games with prizes and promotional campaigns in general.

### **Legal basis of the processing**

The legal basis of the processing of customer data by the Data Controller via the Site is either the agreement stipulated or any previous understandings with the Data Subjects, and in absence of an agreement, the legal basis is to be found in the legitimate interest of the Data Controller in the free economic initiative envisaged in article 41 of the Constitution. As to any additional purposes requiring consent, such a consent is requested in the dedicated section entitled "Privacy Statement and Consent", which shall be equally considered a valid legal basis of any additional data processing.

### **Recipients**

In addition to the Data Controller, data may also be accessed by categories of managers involved in the organisation of the website (administrative, sales and marketing employees, legal consultants and system managers). The Data Controller may also entrust third parties (e.g. independent technical service providers, haulers, hosting provider, cloud services, computer companies, communication agencies), which can be appointed as External Data Processors.

The updated list of Managers can be obtained at all times from the Data Controller, by sending a request to the address specified above.

### **Transfer to a third country**

For the services offered by the website, the Data Controller uses servers situated in the following countries:

- Italy

and hence, according to GDPR 2016/679/EU, they are deemed suitable as they operate within the EU.

Data processed by the Data Controller will never be disseminated.

### **Place of data processing**

Data associated with web services in this website are processed at the headquarters of the Data Controller only by the technical staff of the Department in charge of processing. In case of need, the data related to the newsletter service can be processed by in-house Data Centre operators

(responsible for data processing under article 29 of the Italian personal data protection code) at the company's headquarters.

### **Data storage time and place**

The data are processed for the time necessary to render the service requested by the User and then destroyed by safe means of destruction, such as paper shredders and computer data wiping.

Data concerning profiling and geolocation are destroyed after 12 months from the last purchase or contact with the User.

### **Optional and mandatory nature of the provision of data**

Except for that specified for browsing data that automatically acquire data, users/visitors are free to provide their personal data. Failure to do so may only involve the impossibility to obtain what is requested.

### **Rights of data subjects**

The subjects to whom personal data refers have the right, at any time, to obtain confirmation of the existence or otherwise of said data and to know its content and source, verify its accuracy or request its integration, updating or rectification, pursuant to the GDPR.

The User also has the right to obtain information concerning the following aspects from the Data Controller:

1. confirmation of existence or otherwise of personal data concerning his or her, communication of the same in an intelligible form, their source and the logic on which the processing is based;
2. cancellation, within a reasonable time, transformation into anonymous form of data concerning his or her or blocking of data processed in violation of law;
3. updating, rectification or, when interested, integration of data;
4. certification that the operations pursuant to points 2) and 3) above have been brought to the attention of those to whom the data has been communicated, unless this requirement proves to be impossible or involves a manifestly disproportionate use of resources compared to the right protected.
5. The User has the right to obtain the correction or deletion of the data concerning his or her, or the limitation of processing.
6. The User also has the right to revoke the consent to optional processing not relating to the execution of the agreement entered into with the Data Controller.
7. The User also has the right to object, for legitimate reasons, to the processing of personal data concerning his or her, even if relating to the purpose of collection, to request the portability, to exercise the right to 'be forgotten' and to contact the Supervisory Authority for the protection of personal data for any violations they claim to have suffered, which for Italy is the Privacy Guarantor, by sending an email to [garante@gpdp.it](mailto:garante@gpdp.it), by fax: 06 696773785, or mail, based in 00186 Rome (Italy), 121 Piazza di Monte Citorio.

### **Automated decision-making processes**

No automated decision-making processes are carried out on aggregate data collected, unless they are aimed at better management of the website.

## **CLAUSES FOR CONSENT**

**1) Consent to the provision of curriculum-vitae data.** The User agrees that the data he or she will provide when applying for a job position within the company is processed exclusively for such purposes for a maximum period of 12 months, after which the data will be erased. Failure to provide consent will entail the impossibility for the company to reply to job requests.

Consent

Yes....No

**2) Consent on geolocalisation.** The User agrees to the possibility for the Data Controller to identify the location of the User in the territory, directly or through third-party applications, for the purpose of improving site management. Failure to provide consent does not affect the use of the site.

Consent

Yes....No

**3) Consent to the provision of data for advertising purposes.** The User agrees to the use of his/her personal data for the execution of the contract and also for marketing purposes. Failure to provide consent does not affect the use of the site.

Consent

Yes....No

**4) Consent to the provision of data for profiling purposes.** The User agrees to the use of his/her personal data for the execution of the contract and also for the purpose of profiling his/her tastes and buy preferences. Failure to provide consent does not affect the use of the site.

Consent

Yes....No

**5) Consent to the provision of data to third parties.** The User agrees to the use of his/her personal data for the execution of the contract and also for communications to third parties, its subsidiaries or associates for the purpose of improving the execution of the contract or for a legitimate interest of the Data Controller or any Third Parties. Failure to provide consent does not affect the use of the site.

Consent

Yes....No

**6) Consent to the provision of data to Non-EU Countries.** The User agrees to the transfer of his/her personal data to Countries outside the European Union, however provided with adequate guarantees on the correct processing of data pursuant to the GDPR 2016/679/EU, namely the use of cookies, apps and website hosting services. Failure to provide consent will entail the impossibility for the company to access the site.

Consent

Yes....No