



PRIVACY POLICY AND TERMS OF USE

With this policy we want to inform the customer, named Data Subject, regarding its management methods relative to the processing of their personal data, as prescribed by European Regulation 2016/679 – General Data Protection Regulation.

We wish to specify that the mechanisms of consent will be obvious, brief and easy to understand. If the original conditions for which we requested the consent should undergo changes, for example should the purpose of the data processing change, additional consent will be requested in accordance with European Regulation 2016/679. Furthermore, we specify that all the consents collected will be documented and kept separate from any other company document.

Data Controller of the processing

Your personal data will not be disclosed and you may exercise the rights pursuant to Articles 11-20 of European Regulation 2016/679 by writing to:

RGR srl

Via degli Artigiani, 15
34070 – San Pier d’Isonzo (GO) - Italy

Email address of the Data Controller: rgr@rgr.fvg.it

The processing connected takes place at the aforementioned offices and at the offices of the service provider of the web site of the Data Controller, and is handled only by the personnel of the company, or by any individuals assigned for occasional maintenance operations.

Types of Data collected

Among the Personal Data collected autonomously or through third parties, are: company name, fiscal data, phone numbers and similar, email address, points of contact.

The Personal Data can be freely provided by the Data Subject or, in the case of Usage Data, collected automatically during the Service communications.

Unless specified otherwise, all the Data requested required by the supply requirements of the Service are compulsory. If the Data Subject refuses to communicate the Data, it may be impossible to provide the Service. Should our organization indicate that certain Data are optional, the Subject are free to refrain from communicating that Data without there being any consequence regarding the availability of the Service or its operation.

The Data Subjects who may have doubts regarding what Data are compulsory, are encouraged to contact the Data Controller.



PRIVACY POLICY AND TERMS OF USE

The Data Subject assumes the responsibility for the Personal Data of third parties obtained and guarantees that he/she has the right to communicate or disclose them, releasing the Data Controller from any liability towards third parties.

Processing methods and location of the Data collected

Processing Methods

The Data Controller adopts the appropriate security measures aimed at preventing the unauthorized access, disclosure, modification or destruction of the Personal Data.

The processing is carried out with computer and/or electronic instruments, with organizational methods and logics strictly related to the purposes indicated. In addition to the Data Controller, in certain cases, other individuals involved in the organization of **RGR srl** (administrative, commercial, marketing, legal personnel and system administrators) or outside subjects (such as third party technical services providers, postal couriers, hosting providers, IT companies, communication agencies) appointed also, if necessary, as Processors by the Data Controller may have access to the Data. The updated list of the Processors may always be requested from the Data Controller.

Legal basis of the processing

The Data Controller processes Personal Data relative to the Data Subject should one of the following conditions exist:

- the Data Subject has provided their consent for one or more specific purposes; Note: in some legislations, the Data Controller can be authorized to process Personal Data without there having to be the consent of the Data Subject or another one of the legal bases specified below, until the Data Subject objects (“opt-out”) to that processing. This is however not applicable if the processing of the Personal Data is regulated by the European legislation regarding the Protection of Personal Data;
- The processing is necessary for the implementation of a contract with the Data Subject and/or the implementation of pre-contractual measures;
- The processing is necessary to fulfil a legal obligation to which the Data Controller is subject;
- The processing is necessary for the implementation of a task of public interest or for the exercise of public authority with which the Data Controller is vested;
- The processing is necessary to pursue the legitimate interest of the Data Controller or third parties.

It is however always possible to ask the Data Controller to clarify the actual legal basis of every processing action and in particular to specify whether the processing is based on the law, required by a contract or necessary to conclude a contract.



PRIVACY POLICY AND TERMS OF USE

Place

The Data are processed at the operational sites of the Data Controller and in any other place in which the parties involved in the processing are located. For additional information, please contact the Data Controller.

The Personal Data of the Data Subject could be transferred to a country other than the one in which the Data Subject is located. For additional information on the processing location, the Data Subject can refer to the section relative to the details on the processing of the Personal Data.

The Data Subject has the right to obtain information regarding the legal basis of the transfer of Data outside the European Union or to an international organization established under international public law or composed of two or more countries, such as for example the UN, as well as regarding the security measures adopted by the Data Controller to protect the Data.

If one of the transfers just described takes place, the Data Subject may refer to the respective sections of this document or ask for information from the Data Controller by contacting him/her at the contact information provided at the beginning.

Storage period

The Data are processed and stored for the time required by the purposes for which they were collected.

Therefore:

- The Personal Data collected for purposes connected to the implementation of a contract between the Data Controller and the Data Subject will be kept until the implementation of that contract has been completed.
- The Personal Data collected for purposes attributable to the legitimate interest of the Data Controller will be kept until that interest has been satisfied. The Data Subject can obtain additional information regarding the legitimate interest pursued by the Data Controller in the relative sections of this document or by contacting the Data Controller.

When the processing is based on the consent of the Data Subject, the Data Controller may keep the Personal Data for longer until such time as that consent is revoked. Furthermore, the Data Controller may be obliged to keep the Personal Data for a longer period of time in compliance with a legal obligation or by order of an authority.

At the end of the storage period, the Personal Data will be deleted. Therefore, at the expiry of that deadline the right of access, erasure, rectification and the right to the portability of the Data may no longer be exercised.

Purpose of the Processing of the Data collected

The Data Subject's Data are collected to allow the Data Controller to provide his/her Service, as well as for contacting the Data Subject.



PRIVACY POLICY AND TERMS OF USE

To obtain additional detailed information on the purposes of the processing and the Personal Data actually significant for every purpose, the Data Subject can refer to the relative sections of this document.

Details on the processing of the Personal Data

The Personal Data are collected for the following purposes:

- satisfy, even before the contract is defined, specific requests from or to **RGR srl** (such as contact requests, quotation, availability, delivery times, etc.);
- fulfill the obligations arising from any contractual relationship;
- fulfill administrative, accounting and tax obligations;
- comply with any legal obligations inherent in the contract or regulation relating to the activity;
- manage service communications between the Data Subject and the Data Controller;
- exercise the rights of the owner in court for the management of any disputes.

Rights of the Data Subject

The Data Subjects may exercise certain rights with reference to the Data processed by the Data Controller.

In particular, the Data Subject has the right to:

- revoke the consent at any time. The Data Subject can revoke the consent to the processing of his/her Personal Data previously expressed.
- Object to the processing of his/her Data. The Data Subject can object to the processing of his/her Data when it is carried out on a legal basis different than the consent. Additional details on the right of objection are indicated in the following section.
- Access his/her Data. The Data Subject has the right to obtain information on the Data processed by the Data Controller, regarding certain aspects of the processing and to receive a copy of the Data processed.
- Check and request rectification. The Data Subject can check the accuracy of his/her Data and request their update or rectification.
- Obtain the restriction of the processing. When certain conditions are met, the Data Subject can request the restriction of the processing of his/her Data. In that case, the Data Controller will not process the Data for any other purpose except their storage.
- Obtain the erasure or removal of his/her Personal Data. When certain conditions are met, the Data Subject can request the erasure of his/her Data by the Data Controller.
- Receive his/her Data or have them transferred to another Data Controller. The Data Subject has the right to receive his/her Data in a structured, commonly used format legible from automatic device and, if technically feasible, to obtain the transfer without impediment to another Data Controller. This provision is applicable when the Data are processed with automated instruments and the processing is based on the Data Subject's consent, in a contract of which the Data Subject is part or by contractual measures connected to him/her.



PRIVACY POLICY AND TERMS OF USE

- File complaint. The Data Subject may file a complaint to the Competent Supervisory Authority for the Protection of Personal Data or file in court.

Details on the right to object

When the Personal Data are processed in the public interest, in the exercise of public authority with which the Data Controller is vested or to pursue a legitimate interest of the Data Controller, the Data Subjects have the right to object to the processing for reasons connected to their particular situation.

How to exercise the rights

To exercise the rights of the Data Subject, the Data Subjects can send a request to the contact information of the Data Controller provided in this document. The requests are filed free of charge and dealt with by the Data Controller as quickly as possible, in any case within one month.

Additional information on the processing

Defence in court

The Personal Data of the Data Subject may be used by the Data Controller in court or in the phases preparatory to a possible court case for the defence against abuses occurring during the provision of the Service.

The Data Subject declares that he/she is aware that the Data Controller could be obliged to reveal the Data by order of the public authorities.

Specific Disclosures

At the request of the Data Subject, in addition to the information included in this privacy policy, **RGR srl** could provide the Data Subject with additional and simultaneous disclosures concerning specific Services, or the collection and processing of Personal Data.

Information not included in this policy

Additional information relative to the processing of the Personal Data may be requested at any time from the Data Controller by using the contact information.

Changes to this privacy policy

The Data Controller reserves the right to make changes to this privacy policy at any time by notifying the Data Subjects on this page and, if requested by the Data Subject, by sending a notice through one of the contact details in the Controller's possession. Therefore, please check this page regularly, referring to the date of the last change (last update) printed at the bottom.



PRIVACY POLICY AND TERMS OF USE

Should the changes involve processing the legal basis of which is consent, the Data Controller will arrange to obtain the Data Subject's consent once again, if necessary.

Definitions and Legal References

Personal Data (or Data)

Personal data are any information which, directly or indirectly, also in connection with any other information, including a personal identification number, identifies an individual or makes them identifiable.

Usage Data

This is information collected automatically or specifically requested for the provision of the Service.

Data Subject

The natural person or company to whom the Personal Data refers.

Processor

The natural person, legal entity, the public administration and any other organization that processes personal data on behalf of the Data Controller, as explained in this privacy policy.

Data Controller (or Controller)

The natural person or legal entity, the public authority, the service or other body which, individually or with others, determines the purposes and the processing means of the personal data and the instruments adopted.

Service

The Service provided in accordance with the provisions of the contractual agreements, in compliance with the laws and regulations in force.

European Union (or EU)

Unless specified otherwise, any reference to the European Union included in this document is intended extended to all the current member states of the European Union and the European Economic Area.

Legal References

This privacy disclosure is drafted based on multiple legislative regulations, including the European Regulation 2016/679.