

## Information Notice for Website Users on Personal Data Processing

Pursuant to Articles 13 and 14 of Regulation 2016/679/EU (hereinafter referred to as “GDPR”)

### Notice scope

Costruzioni Meccaniche Luigi Bandera S.p.A. (hereinafter referred to as “Company” or “Data Controller”) committed itself in respecting and safeguarding your data protection and privacy and wants you to feel safe and confident during website browsing as well as if you decide to log into Company website providing your personal data to benefit from services available for Company Users and/or Customers. On this webpage, the Company intends to give useful information about personal data processing to users visiting or browsing the Company website at [www.luigibandera.com](http://www.luigibandera.com) (hereinafter referred to as “Website”). Information Notice hereof shall apply to Company Website but not to any other websites accessed by the user via available links (Data Subject shall refer to data protection information notices/policies thereof). Any use or reproduction of pages, materials and information in the Company Website, by any means and on any media, is prohibited without prior written consent by the Company. Copy and/or printout of any aforementioned contents shall be allowed for personal use only and exclusively; commercial use is hereby explicitly excluded (for any request and further details, please contact the Company to reference details provided hereunder). Any other use of Website contents, services and information is hereby prohibited.

As far as supplied contents and information, the Company is committed in keeping Website contents reasonably updated and revised; furthermore, the Company hereby does not ensure supplied information are suitable, precise or complete, therefore it shall not be responsible for any errors and/or omissions in information supplied on the Website.

### Origin – Browsing data

Costruzioni Meccaniche Luigi Bandera S.p.A. hereby informs you that the personal data you provided (and consequently collected by the Company) upon submitting information and/contact request, Website login and use of services via smartphone or any other device used to access the Internet, as well as any data necessary to provide the aforementioned services, browsing data and data used for any purchase of Company products and services included, besides the so-called Website “browsing data”, shall be processed in compliance with applicable regulations. Computer systems and software procedures used to operate the Company Website shall acquire, in normal operation, some personal data whose transmission is implicit in using the Internet. Due to its own nature, the aforementioned information, which is not collected to be associated with identified Data Subjects, may make it possible to identify browsing users by processing and combining data held by third parties. IP addresses are included in the aforementioned category of data, as well as domain names of Website users’ computers, URI (Uniform Resource Identifier) addresses of required resources, request time, method used to submit the request to Website server, size of files received as reply, number code indicating the status of the response from the Website server (successful, error, etc.) and other parameters concerning the user’s operating system and IT environment. The aforementioned data shall be used for the only purpose of obtaining anonymous statistical information about Website use and of controlling proper Company Website operation. It is hereby highlighted that the aforementioned data may be used to ascertain any responsibility in the event of cybercrimes against Company Website or other websites connected or related to it: without prejudice to this event, as a matter of fact data concerning web contacts shall not be stored longer than a few days.

### Origin – Data supplied by the user

The Company shall collect, store and process your personal data to supply products and services offered on the Website or to fulfil applicable law provisions. With regard to specific Services, Products, Promotions, etc. the Company may process your data for commercial purposes as well. In the aforementioned cases, a specific, dedicated and optional consent shall be required according to the modalities and to the reference contacts hereunder specified; consent thereof may be withdrawn at any time.

Optional, explicit and voluntary e-mails to the e-mail addresses specified in the dedicated Website section, as well as any questionnaire (e.g. form) completion, communication via chats, push notification via APP, social network, call centre, etc., shall result in the acquisition of your personal data, therein included any personal data collected using the



App and any related services, which are required to answer requests. Moreover, the Company hereby informs that, upon connecting via mobile devices to access digital contents and services offered by the Company or Company Partners, it may be necessary to transfer your personal data to third parties. It is hereby highlighted that you may access Company Website or connect to areas where you may be enabled to publish information via blog or bulletin boards, to communicate with third parties, e.g. from Company page on Facebook®, LinkedIn®, Youtube®, and other social network websites, to view products and offers and to publish comments or contents. Before interacting with the aforementioned areas, please carefully read General Terms and Conditions of Use, and consider that, in some circumstances, published information may be viewed by anyone accessing the Internet and that all information you include in your publications may be read, collected and used by third parties.

### **Data processing legal basis and purposes**

Data Subject's personal data shall be processed for the following purposes:

- 1) Purposes strictly connected and necessary to login onto [www.Company.it](http://www.Company.it) Website; services and/or App developed or made available by the Company; use of the relevant information services; management of requests for contact or information, and purchase of products or services offered via Company Website;
- 2) Ancillary activities connected with managing requests by Website User/Customer and sending feedbacks, which may include promotional material; ancillary activities aimed at completing product and service purchase orders, including payments by credit card, shipment management, exercise of right of withdrawal concerning remote purchases, and updates about new availability of products and services which are temporarily unavailable;
- 3) Purposes related to fulfilment of obligations set forth under European Community and national regulations, to prevention of disorders, and to investigation and prosecution of criminal offences;
- 4) Direct marketing, i.e. transmission of advertising material, direct sales, market research or commercial communication about products and/or services offered by the Company; the aforementioned activities may concern products and services of Companies from the Company Group and may be carried out by sending advertising/information/promotional material and/or invitation to participate into initiatives, events and offers aimed at rewarding users /customers, either by "traditional" methods (e.g. paper mail and/or calls by operators), or by "automated" contact systems (e.g. texts and/or MMS, phone calls without operator's intervention, e-mails, fax messages, interactive applications), pursuant to Article 130 paragraphs 1 and 2 of Italian Law Decree no. 196/03 and subsequent amendments and additions.

Provision of data for the purposes under points 1), 2) and 3) hereof, connected with a preliminary contract and/or contract, or functional to a request by the user, or required under a specific regulatory provision, shall be mandatory and, in the contrary, it shall not be possible to receive information and access requested services; as far as point 4) of the Information Notice hereof is concerned, data processing consent by the user /customer shall be free and optional and may be withdrawn at any time without any consequence on product and services usability. Nevertheless, if Data Subject does not provide his or her consent to data processing, he/she is not be able to receive updates about new initiatives or special promotions or benefits for users/customers from the Company.

Pursuant to Regulation 2002/58/EU, the Company may send commercial communications about products and/or services similar to the ones already supplied, by using electronic mail details or standard mail ones the Data Subject already provided; Data Subject shall have the right to oppose the above according to modalities and contact details provided hereunder.

### **Modalities and logics of data processing, storage periods and security measures**

Data Subject's personal data shall be processed even by electronic and automated means and shall be carried out by the Company and/or by third parties the Company may entrust with processed data storage, management and transmission. Data shall be processed with organization and processing logics, even related to logs originated by Website service access and use, as well as products and services used with regard to the aforementioned purposes and, anyway, so as to ensure data security and protection. Processed personal data shall be stored for the time periods set forth under regulations in force.



With regard to data security, any personal data requested to the browsing user in the Website sections dedicated to special services, shall be encrypted via Secure Sockets Layer (SSL). SSL technology encrypts information before it is exchanged between the user's PC and the Company centralized systems via the Internet; in this way, information becomes unintelligible to unauthorized users and transmitted information protection is ensured. Moreover, any transaction made via e-payment systems shall be executed on the Payment Service Provider (PSP) platform and the Company shall store just the minimum set of information that is necessary to manage any claims. With reference to personal data protection, pursuant to Art. 33 of GDPR the user/customer is recommended to notify the Company with any circumstances or events from which a potential "personal data breach" may occur in order to allow for a prompt assessment and adoption of any actions aimed at counter the above event; to do so, please notify to [privacy@Company.it](mailto:privacy@Company.it) or contact Company Customer Service. Any measures adopted by the Company shall not exempt Customer from paying the necessary attention in using, if required, passwords/PINs of adequate complexity. The User shall periodically update passwords/PINs, especially in case he / she fears they have been infringed/known by third parties; moreover, the User shall carefully store and make passwords/PINs inaccessible to third parties in order to prevent any improper and unauthorized use.

## **Cookies**

Cookies are a short text strings sent to your browser and eventually saved on your computer (or your smartphone/tablet or any other device you used to access the Internet). In general, cookies are sent each time you visit a website. The Company uses cookies for several purposes to offer you a fast and safe digital experience, e.g. cookies keep you connected to the Website protected area.

Cookies stored on your computer cannot be used to recall data from your hard disk, transmit cyber viruses or to identify your e-mail address. Each cookie is uniquely related to the browser and device you used to access Company Website or to you the Company App. In general, cookies help to improve website operation and user's browsing experience; nevertheless, cookies may be used to send advertising messages (as hereunder detailed). For further information about cookies and their operation, please visit "All about cookies" section at <http://www.allaboutcookies.org>.

For any details about Cookies, please refer to Company Website dedicated page (Cookie Policy).

## **Data communication and transfer**

In order to pursue the aforementioned purposes, the Company may communicate and make process users/customers' personal data, in Italy and abroad, by third parties with whom the Company cooperate, provided the mentioned third parties supply services upon Company request. Company shall supply the aforementioned third parties with information necessary to carry out the required services only and exclusively, taking any measure to protect Data Subject's personal data. Data Subject's data may be transferred outside the European Economic Area if necessary to manage his or her contract relation. In the aforementioned case, data recipients shall be subject to data protection and security obligations equivalent to those ensured by Data Controller. In the event any services offered by its Partners, Company shall only supply any data strictly required to provide the services thereof. In any case, only data strictly necessary to pursue relevant purposes and any applicable warranties shall be applied to cross-border data transfers, if required. Company may disclose data Subject's personal data to suppliers providing commercial services, for marketing purposes; in the case hereof, the aforementioned Company suppliers shall be appointed External Data Processors. Furthermore, personal data may be communicated to competent public bodies and authorities for any purpose related to statutory obligation fulfilment or responsibility ascertainment in case of cybercrimes against Company Website. Moreover, the aforementioned data may be communicated to or allocated at third parties (as Data Processors or, if e-communication service providers, as independent Data Controllers) providing IT and electronic services (e.g.: website hosting, management and development) and entrusted by the Company to carry out tasks and activities - also of technical and organizational nature - which are instrumental to Company Website operation. Any third parties belonging to the aforementioned categories shall operate as independent Data Controllers or as Data Processors purposely appointed by the Company.

Moreover, Data Subject's personal data may be known to Company employees/consultants, who shall be duly instructed and appointed Data Processors.

Categories of recipients to whom data may be communicated are available at the Company; for any request thereabout, please refer to Company reference contacts here below.

## Data Subject's rights

You, as Data Subject, shall be entitled to exercise the rights conferred on you by law provisions; among others, you shall be entitled to:

- a) Access your personal data, receiving proof of purposes pursued by Data Controller, of data categories, of data recipients, of storage time, and of existence of any automated decision-making processes;
- b) Obtain the rectification of inaccurate personal data concerning you, without undue delay;
- c) Obtain data erasure, in any case set forth under regulation;
- d) Obtain restriction of processing or to oppose to processing, whenever possible;
- e) Require portability of data you supplied to the Company, i.e. to receive them in a structured, commonly used and machine-readable format, even to transmit those data to another data controller, within the limits and under obligations set forth under Art. 20 of GDPR.

Furthermore, you shall be entitled to lodge a complaint with a supervisory authority for Personal data protection pursuant to Art. 77 of GDPR.

For data processing under point 4) of the purposes, the Customer may withdraw its consent and exercise right to oppose to direct marketing activities (either "traditional" or "automated"). Unless direction on the contrary is provided, opposition hereof shall refer to traditional as well as to automated communications.

## Data Controller

Data Controller, pursuant to provisions set forth under Art. 4 of Data Protection Code and GDPR, shall be **Costruzioni Meccaniche Luigi Bandera S.p.A.**, having its registered office at no. 120 Corso Sempione - 21052 Busto Arsizio (VA), VAT no. 00219880127 and Tax Code 00219880127

The aforementioned rights may be exercised by Data Subject according to modalities disclosed by Company Customer Service or via Company Website or contacting Eng. Dulio Marco, **Bandera Data Protection Officer (DPO)**, in writing, at: corso Sempione no. 120 – 21052 Busto Arsizio (VA) or via e-mail at: [qualita@lbandera.com](mailto:qualita@lbandera.com).

The use of Company Website, websites intended for tablets and/or smartphone hereby included, by the Customer and/or User shall imply full knowledge and acceptance of contents and any instructions included in the Information Notice hereof, which is published and displayed by the Company upon access to Company Website. Costruzioni Meccaniche Luigi Bandera S.p.A. hereby informs that the Information Notice hereof may be amended without prior notice; therefore, it is hereby recommended to read the Information Notice hereof periodically.

Data Processor

Piero Bandera

*The information notice hereof has been updated on 25 May 2018*