

Privacy Policy

UPDATED ON 23.12.2021

This policy is written and personalised for visitors of www.sadel.it website. This document annuls and replaces in its entirety the previous cookies document.

WEBSITE POLICY PURSUANT TO THE PROVISIONS OF ART. 13 AND 14 OF EUROPEAN REGULATION 2016/679 (GDPR)

Specific summary information will progressively be indicated or displayed on website pages dedicated to particular services on request requiring the submission of data collection forms. We also inform you that, to provide a complete service, our website may contain links to other websites, not managed by SADEL S.p.A. SADEL S.p.A. is not responsible for errors, contents, cookies, publication of illegal moral content, advertising, banners or files that do not comply with the laws in force and the respect of Privacy laws by sites not managed by the Controller.

SADEL S.p.A., in its capacity as Data Controller of your personal data, pursuant to and in accordance with articles 13 and 14 of European Regulation 2016/679, hereby informs you that the aforementioned regulation establishes the protection of data subjects as regards personal data processing and that said processing shall be grounded in the principles of propriety, lawfulness, transparency and shall ensure the protection of your confidentiality and rights. Personal data and information submitted by you or otherwise acquired while using the website shall be processed in compliance with provisions set forth in the aforementioned legislation and confidentiality requirements established therein.

DATA SUBJECTS AND STORAGE TIME

A) users (navigators) of the www.sadel.it

Type of data processed

- Navigation Data: *IP addresses or domain names of computers and other devices used by users who connect to the site; URI (Uniform Resource Identifier) addresses of requested resources and any time indications thereof; parameters relating to the user's operating system and IT environment; start and finish pages; Navigation index and identification behaviour during display of website pages.*
- Personal data provided voluntarily by the user: *the optional, explicit, voluntary sending of emails to the addresses provided on this website and the compilation of forms it contains implies the subsequent acquisition of the sender's personal data (for example, name, surname and email address). Specific, summarised information is provided on the pages where forms are available.*

Purpose of processing: *your data collected during browsing will be processed for the following purposes.*

- 1) performance of operations closely related and instrumental to the management of relations with users or with visitors of the website;
- 2) *collection, storage and processing of your data for statistical analyses, also in anonymous and/or aggregate form; statistical analyses aimed at verifying the quality of the services offered by the site;*

Data processing for fulfilling purposes stated in point 1 is necessary in order to fulfil your request and any refusal may limit and/or prevent full use of functionalities and services available on the website. The provision of data specified in purpose 2 is optional on the legal basis of consent, and any objection to processing shall not affect the functionality and services on the website. Consent is provided in the brief policy by clicking on the word "ALLOW ALL COOKIES" inside it. With regard to the optional provision of data, more information is provided on the cookies present on the site in the cookie policy document, which can also be accessed from the brief policy. You can change your consent at any time by accessing the "Review your cookie choices" area in the footer of the website.

The navigation data are stored for the time frames specified in the cookie policy, which is available on the site.

COOKIES AND OTHER TRACKING SYSTEMS

Your data are also acquired by means of tools and services provided by third parties and stored by the same. For further information, please read the [cookie policy](#). Please note that SADEL S.p.A. is merely an intermediary for the links indicated in the cookie policy and cannot be held in any way responsible in the event of any modifications.

PERSONAL DATA PROCESSING METHODS

Your personal data will be processed electronically and/or telematically and through the use of cookies (as indicated in the cookie policy available on the site in compliance with the procedures indicated as per articles 6, 32 of the GDPR and through the adoption of the appropriate security measures provided.

MEDIA PLATFORMS

Sadel S.p.A.

SADEL S.p.A. may also provide links to other social media platforms which lead to servers installed by individuals or organisations over which it has no control. SADEL S.p.A. provides no representation, nor does it take any responsibility for the accuracy or any other aspect of the information available on such sites. The link to a third-party website cannot be understood as validation, on behalf of SADEL S.p.A., nor on behalf of the said third party, of the products and services of others or of the said third party. SADEL S.p.A. does not issue declarations or guarantees as to the use or filing of the user's data with third-party sites. We invite our users to examine the privacy policy that governs the third-party sites linked to our website carefully to have a complete view of the possible use of your personal data

RECIPIENTS OF PERSONAL DATA AND DATA DISSEMINATION

Your data will be processed by duly authorised staff and will be disclosed to companies acting in their capacity as autonomous Controller or Data processor:

- external entities providing in-cloud services;
- technical assistance providers;
- third party service providers

You may request the full list by writing to the Controller

Your data will not be distributed.

TRANSFER OF PERSONAL DATA:

Your personal data may also be transferred, limited to the above mentioned purposes, to non-EU countries. Such transfer for sending company reports is legitimate insofar as it is guaranteed by the existence of adequacy decisions issued by the European Commission and/or protection clauses based on models adopted by the European Commission pursuant to art. 46 of the GDPR. You can request the Controller a copy of data protection measures implemented for the transfer of your personal data outside the EU, as well as information on the place where said data has been made available, by submitting a specific request to the Controller to the following email address: privacy@sadel.it

For data processed by cookies only, your data will be transferred to countries outside the European Union as indicated in the cookie policy of the companies providing the third-party cookie services. For more information, contact privacy@sadel.it

MINORS

The Website is not intended for use by minors and no data from minors is collected by the Controller. In the event that the Data Controller is aware of the collection of such data (e.g. via the contact form) it will delete it immediately. The Controller will respond to requests for information in accordance with applicable laws. Please note that the person exercising parental responsibility is obliged, in the case of requests for information, to provide us with consent to the collection of the minor's personal data.

DATA CONTROLLER

The Data Controller is SADEL S.p.A., with registered office in Via Marino Serenari 1 – 40013 Castel Maggiore (Bo) Italy Phone. +39 051 705884 fax +39 051 705833 in the person of its pro tempore Legal Representative. Data Controller has appointed a Data Protection Officer (“DPO”) that you can contact at the registered office of Almaviva S.p.A. via Casal Boccone 188/190 – 00137 Roma (Italy) Phone. +39 06 3993.3549 email dpo.gruppoalmaviva@almaviva.it

You have the right to obtain from the Data Controller the erasure (right to be forgotten), limitation, updating, rectification, portability, objection to the processing of personal data concerning you, and in general you can exercise all the rights provided for in Articles 15, 16, 17, 18, 19, 20, 21, 22 of European Regulation 2016/679 by sending an e-mail to privacy@sadel.it

You also have the right to lodge a complaint with the Supervisory Authority

APPLICATION OF THE POLICY HEREIN

If you have any doubts regarding this Policy, please contact SADEL S.p.A. by sending an e-mail to privacy@sadel.it

AMENDMENTS TO THIS POLICY

SADEL S.p.A. reserves the right to update this policy in order to adapt it to any changes in the law and with due consideration of any suggestions submitted by employees, customers, associates and users. In the event of amendments on the part of SADEL S.p.A., the Privacy Policy on the main page of privacy and on the Homepage of the www.sadel.it website will promptly be updated

RIGHTS OF DATA SUBJECTS

EU Reg. 2016/679: Articles 15, 16, 17, 18, 19, 20, 21, 22 - Rights of the data subject



1. The data subject is entitled to obtain confirmation as to the existence or otherwise of personal data concerning them, even if said data is yet to be recorded, and the disclosure of said data in an intelligible form, as well as to lodge a complaint with the Supervisory Authority.
2. The data subject has the right to receive the following information:
 1. the source of personal data;
 2. the purposes and processing methods;
 3. the logic applied in the event processing is carried out by electronic instruments;
 4. the identification details of the data controller, of the processors and of the appointed representative according to art. 5, para. 2;
 5. the subjects and categories of subjects to whom the personal data may be disclosed or who may become aware of said data in their capacity as designated representative in the country, as data processors or personnel authorised to process personal data.
3. The data subject is entitled to obtain:
 1. the updating, rectification or, if interested, the integration of data;
 2. the erasure and transformation into anonymous form of any unlawfully processed data or data blocks, including those whose retention is not required in relation to purposes for which data were collected or successively processed;
 3. certification that operations specified in letters a) and b) have been disclosed, together with their content, to the people to which data has been disclosed or provided, unless this proves impossible or requires the use of means clearly disproportionate to the right being protected;
 4. data portability.
4. The data subject is entitled to raise a total or partial objection:
 1. for legitimate reasons, to the processing of the personal data concerning them, even if pertaining to the purpose of collection;
 2. to the processing of personal data for the purpose of sending advertising materials or making direct sales or for carrying out market surveys or sales communications.

