

**PRIVACY INFORMATION**  
**- Art.13 EU Regulation 2016/679**

CO.DE.TEX. S.r.l, CO.TE.CO. S.r.l. and C.V.T. S.r.l. undertake to protect and safeguard the privacy of users of their site, to ensure adequate levels of privacy, security and transparency.

Any information or personal data that will be provided, will be treated according to the internationally recognized principles of lawfulness, correctness, transparency, limitation of purpose and storage, minimization of data, accuracy, integrity and confidentiality.

On the site there are icons and applications of third parties (google maps, facebook, twitter): the Joint Controllers invite the interested parties to view the privacy policies of their respective managers / controller of the treatment, as the treatments carried out by these subjects are not covered by this policy.

This document was drawn up on 20 May 2018 (last update of 01/03/2019); occasionally we may need to change it, also due to changes in the applicable legislation. In order to keep up to date, we invite the interested party to visit this section regularly to learn about the most recent and updated version of the Information. By using our services, the Interested Subject consents to the use of his/her data by us in accordance with this Privacy Policy.

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**1. Joint Controllers.**

Joint Controlles, pursuant to the art. 26 of EU Regulation 2016/679, in relation to all data provided by users and in relation to the purposes described below are:

CO.DE.TEX. S.r.l., with registered office in Alba (CN), Via Ognissanti n. 32/B, Italy (in short "Co.de.tex.");

CO.TE.CO. S.r.l., with registered office in Alba (CN), Via Ognissanti n. 32/B, Italy (in short "Co.te.co")

C.V.T. S.r.l., with registered office in Alba (CN), Via Ognissanti n. 32/B, Italy (in short "C.V.T.").

The essential content of the joint ownership contract signed between Co.de.tex., Co.te.co and

C.V.T. containing the respective responsibilities regarding the observance of the obligations deriving from the regulations in force, and in particular regarding the exercise of the rights of the interested party, is available on our website.

## **2. Data subject to processing.**

The personal data processed through the Site are as follows:

- a. Name, Surname, email and other data voluntarily provided by the interested party

In the section of the Site "Contact us, send us a request", you will be asked to enter information such as name, surname and email address. There is also a field notes in which you can collect additional information that the Interested Party will decide to provide.

- b. Third party data provided by the Interested Party

As already mentioned above, in the contact us section, you are allowed to enter text messages, visible to the Co-owners, which may contain (voluntarily or not) personal data of other people. With respect to these assumptions, the interested party must be considered independent data controller, assuming all the obligations and responsibilities arising from the law towards "third parties concerned".

- c. Navigation data

The computer systems and software procedures used to operate the website acquire by default, some personal data whose transmission is implicit in the use of Internet communication protocols. This information is not collected to be associated with identified parties, but by their nature could, through processing and in association with data held by third party, allow users to be identified. This category includes IP addresses, domain names of computers used by users who connect to the Site, addresses in URI (Uniform Resource Identifier), the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response from the server (successful, error, etc..) and other parameters relating to the operating system and computer environment of the person concerned. These data are used only to obtain anonymous statistical information on the use of the Site, to check its proper functioning and to identify anomalies and / or abuse.

In order to collect information, in aggregated form, on the number of users and on how they visit the site, we use the Google Analytics service.

Google Analytics is a web analysis service provided by Google Inc. ("Google"). Google uses the Personal Data collected for the purpose of tracking and examining the use of this website, compiling reports and sharing them with other services developed by Google. Google may use your Personal Data to contextualize and customize ads from its advertising network.

Personal Data Collected: Cookies and Usage Data.

Place of processing: USA -Privacy Policy-Opt Out.

On the site there are also navigation widgets of Google Maps (also belonging to Google Inc.).

Google Maps is a map viewing service operated by Google Inc. that allows this website to integrate these contents into its pages.

Personal Data Collected: Cookies and Usage Data.

Place of processing: USA -Privacy Policy.

### **3. Legal basis and mandatory or optional nature of the processing**

The legal bases used by the Joint Controllers to process personal data, according to the purposes indicated in Article 4 below, are as follows:

- Supply of service / performance of pre-contractual negotiations / contractual obligations: the processing for this purpose is necessary for the signing or execution of the contract signed with the interested party and, therefore, to provide the services contractually agreed. The provision of personal data for this purpose is not mandatory, but otherwise, will not be possible for us to provide any service.
- Obligations of law: the treatment for this purpose is necessary so that the Joint Controllers can fulfill any legal obligations. The personal data provided to the Joint Controllers will be processed in accordance with applicable legislation, which means that they can be store for a longer period and that the data can be communicate to the relevant authorities. The provision of personal data for this purpose is not mandatory, but otherwise, will not be possible for us to provide any service.
- Legitimate interest of joint controller: promotional communications to their customers, the processing for this purpose is based on the legitimate interest of joint controller to transmit marketing communications regarding products and services similar to those already purchased. The interested party may, at any time and free of charge, interrupt the receipt of these communications by writing to [protezionedati-coteco@codetex.com](mailto:protezionedati-coteco@codetex.com) and without prejudice to the lawfulness of the processing in the period prior to the opposition.
- Marketing: the processing for this purpose is based exclusively on the consent of the interested party, freely revocable at any time; with the revocation, without prejudice to the legitimacy of the processing during the period of validity of the consent, the interested party will interrupt free of charge the receipt of any marketing communication; to revoke your consent, write to [protezionedati-coteco@codetex.com](mailto:protezionedati-coteco@codetex.com)

### **4. Purpose of the treatment**

The Joint Controllers will process the personal data provided only in the manner set out in this Privacy Policy and in compliance with current legislation. Personal data collected through the Site will be used for the following purposes:

- a. Supply of the service/ fulfillment of contractual and pre-contractual obligations.
- b. Obligations of law to which the joint controllers are subject: for legal fulfillments and/or provisions of public Authority, which require the collection and/or further processing of certain types of personal data.
- c. Legitimate interest of the controller to send promotional offers to its customers: to transmit by e-mail, SMS, telephone, banner, instant messaging, operator, via mail marketing communications, promotions and personalized content regarding products and services similar to those that the customer has already purchased.
- d. Marketing: to send, to anyone who has previously given their consent, marketing communications, promotions and advertising, through the channels identified in letter d) relating to

the products and services of partners and third parties.

In the cases referred to in points a), b), c) above of this article, the Joint Controllers are authorized to process personal data, in accordance with applicable data protection rules, without the need to collect a specific consent of the person concerned. In relation to the purposes referred to in point c), the Interested Party may object to the processing at any time and free of charge: in the event of revocation, the Interested Party may no longer use the services described in the point in question. In the cases referred to in point d) above of this article, the joint controllers will process the data only after obtaining the consent of the Interested Party. The granting of consent, as better specified in art. 3 "Legal basis and compulsory or optional nature of the treatment", is not compulsory, and where given, the interested party is free to revoke it at any time without any consequence (except that of no longer being able to receive marketing communications). More information on the revocation of consent previously given is provided in art. 10 of this Policy.

## **5. Recipients of personal data**

The personal data of the interested party may be destined to the subjects indicated below ("Recipients"):

- Subjects that may act as data processors, i.e.: individuals, companies or professional firms that provide assistance and advice to joint holders in accounting, administrative, legal, tax, financial, debt collection, mailing of advertising materials or contractual communications, companies organizing training events, providers of services for web meetings and web seminars; a complete list of all those responsible can be requested by contacting the email address: [protezionedati-coteco@codetex.com](mailto:protezionedati-coteco@codetex.com)
- Subjects delegated to carry out technical maintenance activities (including maintenance of network equipment and electronic communication networks);
- Persons authorized by the joint controllers to process personal data necessary to carry out activities strictly related to the provision of products/services; a legal obligation of confidentiality applies to such persons;
- Associated companies/group companies for administrative purposes;
- Subjects, Offices or competent Authorities to whom it is mandatory to communicate personal data in order to comply with legal obligations, prevent abuse or fraud.

## **6. Transfers of personal data**

For purposes related to the use of the services, some data may be communicated to recipients located outside the EU Economic Area.

The Joint Controllers ensure that the processing of personal data by these recipients is in compliance with applicable legislation. Indeed, transfers are made through adequate safeguards, such as adequacy decisions, Standard Contractual Clauses approved by the European Commission or other guarantees deemed adequate. More informations are available at the following address: [protezionedati-coteco@codetex.com](mailto:protezionedati-coteco@codetex.com)

## **7. Methods of treatment**

The processing of personal data is carried out by means of the following operations: collection, recording, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, cancellation and destruction of data. Personal data are processed both on paper and electronically and/or automatically, through the use of a website hosted on its own server, located in Italy.

The data will be processed in such a way as to ensure continuous security and confidentiality.

In accordance with European regulations and national laws on data protection, the joint controller have put in place specific procedures to prevent unauthorized access to data, their improper or unlawful use, as well as to prevent the destruction or loss, even accidental, of the data.

Only duly authorized people may have access to the data during their work.

## **8. Retention of personal data**

Personal data processed for the purposes of

- Service Provision/Contractual Fulfillments", will be kept for the time being strictly necessary for the pursuit of that aim;
- "Marketing", will be kept until the revocation of the consent given by the interested party;
- "Sending promotional offers to customers", will be kept until the interested party objects to the treatment;
- "Fulfillment of legal obligations", will be kept for the period provided for by specific legal obligations or applicable legislation;
- "Abuse/Fraud", will be kept for the time strictly necessary for the above purpose.

## **9. Rights of the interested party**

The interested party has the right to ask the co-owners at any time:

- access to their personal data, (and/or a copy of such personal data), as well as further information on the processing in progress on them;
- the rectification or updating of personal data;
- the deletion of personal data from the databases of joint controllers;
- the limitation of the processing of personal data by the partners;
- the portability of data, i.e. to obtain in a structured format, commonly used and readable by automatic device a copy of their personal data provided to partners, or to request its transmission to another holder;
- opposition to the processing of personal data;
- revocation of consent for the intended purposes.

The joint controller will provide the interested party with information relating to one or more of the actions taken in the above list without undue delay and, in any case, no later than one month from the request itself. This period may be extended by two months, taking into account the complexity and number of requests, with consequent information to the interested party of this extension and the reasons for the delay, to be provided within one month of receipt of the request. The interested party also has the right to submit a complaint with the competent Control Authority (for Italy, Autorità Garante per la Privacy, <https://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/4535524>), if it considers that the processing of its personal data is contrary to the legislation in force.

The exercise of the rights referred to in this article may be exercised by the interested party at the

following email address: [protezionedati-coteco@codetex.com](mailto:protezionedati-coteco@codetex.com)

## 10. Modifications

This Information Notice has been in force since 20 May 2018 (last updated: 17/07/2019); the co-owner reserve the right to modify or update it also as a result of any regulatory changes or practices coming from the National Control Authority or from the European Committee for Data Protection.

## 11. Definitions

1. personal data means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
2. processing means any operation or set of operations which is performed upon personal data or sets of personal data, whether or not by automatic means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- 3) Controller: the natural or legal person, public authority, agency or other organization, that alone or jointly with others determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria applicable to its designation may be determined by Union law or Member State law;
- 4) Joint Controllers: where two or more owners jointly determine the purposes and means of processing, they shall be co-owners of the processing;
- 5) Processor means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller; ;
- 6) Recipient: means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;
- 7) third party: the natural or legal person, the public authority, the service or other organization other than the data subject, the data controller, the data controller and the persons authorized to process personal data under the direct authority of the data controller or data processor;
- 8) Interested party's consent: any expression of free will, specific, informed and unequivocal by the Interested party, with which he gives his consent, through a statement or unequivocal positive action, that personal data concerning him are subject to processing;

9) Personal data breach: a security breach that leads accidentally or unlawfully to the destruction, loss, modification, unauthorized disclosure of or access to personal data transmitted, stored or otherwise processed;

10) Supervisory authority: the independent public authority established by a Member State in accordance with Article 51 of Regulation (EU) No 679/2016;

(11) Cross-border processing:

(a) processing of personal data which takes place in the course of the activities of establishments in more than one Member State of a controller or controller in the Union where the controller or the controller is established in more than one Member State; or

(b) processing of personal data which takes place in the course of the activities of a single establishment of a controller or controller in the Union, but which substantially affects or is likely to affect data subjects in more than one Member State.