

## **AB PROGETTI S.r.l. - C.SO VIGEVANO 46 - 10155 TORINO (ITALY)**

Capitale sociale Euro 119.000,00

Iscritta al registro delle imprese di Torino – n. di iscrizione P.IVA/C.F. = 04061900017

Iscritta al R.E.A. di Torino al n. 611839

Tel. +39 011 2485088 – Fax +39 011 2489568

Indirizzo E-MAIL: [info@abprogetti.com](mailto:info@abprogetti.com)

**FORNITURA APPARECCHIATURE DI SCAMBIO TERMICO E TRATTAMENTO FLUIDI**

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AB PROGETTI s.r.l. with registered offices in Torino, Corso Vigevano 46, (Italy) (hereinafter “AB PROGETTI”), in its capacity as data controller regarding the processing of personal data pursuant to the Italian applicable law on data protection *pro tempore* in force (“Italian Data Protection Law”) and the EU Regulation 679/2016 – General Data Protection Regulation (“GDPR”) (hereinafter Italian Data Protection Law and GDPR are collectively referred to as “Applicable Law”) recognizes the importance of personal data protection and considers that preserving the confidentiality of your personal data is one of the main objectives of its activity.

Before providing any personal data, AB PROGETTI invite you to carefully read this privacy policy (“Privacy Policy”), since it contains important information regarding the personal data protection and security measures adopted in order to ensure confidentiality and full respect of the Applicable Law. Moreover, this Privacy Policy is intended for the website [www.abprogetti.com](http://www.abprogetti.com) (“**Website**”) whilst it does not apply to other websites that could potentially be accessed by clicking external links; Is to be construed as an information notice pursuant to Article/Section 13 of the Applicable Law, intended for those who interact with the Website.

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AB PROGETTI informs you that processing of your data will be carried out in accordance with the principles of, lawfulness, fairness, transparency, accuracy, purpose and storage limitations, data minimization, integrity and confidentiality. Your personal data will be processed in accordance with the legislative provisions of the Applicable Law and of the confidentiality obligations included therein.

### **1. DATA CONTROLLER**

Pursuant to the Applicable Law, the data controller of the processing activities carried out through the Website is AB PROGETTI as defined above.

### **1. PERSONAL DATA SUBJECT TO PROCESSING**

“**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, mental, economic, cultural or social identity of that natural person.

By means of the Website, AB PROGETTI collects the following Personal Data:

#### **a. Browsing Data**

The computer systems and software procedures used to operate the Website collect some Personal Data, the transmission of which is an integral part of Internet communication protocols. This information is not collected to be associated with you but, by its very nature, it may allow you to be identified by processing and associating it with data held by third parties. Among collected Personal Data there are IP addresses or domain names of the devices used by you to connect to the Website, the URI (Uniform Resource Identifier) of requested resources, the time of the request, the method used to submit the request to the server, the size of the file received as a reply, the numeric code indicating the status of the reply given by the server (successful, error, etc.) and other parameters regarding your operating system and device environment.

This data is used exclusively for the purposes of obtaining anonymous statistics on the use and proper functioning of the Website to control its correct functioning, to enable AB PROGETTI to correctly provide the various functionalities to you, as well as for security reasons. These Personal Data may also be used to ascertain any liability in cases of alleged computer crimes against the Website or against third parties and they will be deleted after 7 days.

#### **b. Data provided on a voluntarily basis**

By means of the Website you may voluntarily provide Personal data such as name, e-mail address for subscribing the on-demand service newsletter, gift card or to contact AB PROGETTI via the "Contact Us" form. AB PROGETTI will process these data in accordance with the Applicable Law and on the presumption, they refer to you or to third parties who have authorized you to provide them pursuant to an appropriate legal basis which legitimize the processing at stake. In this case, you act as an independent data controller, assuming all relevant obligations and responsibilities according to the Applicable law. In this regard, you hence waive, in the full sense of the term, the right to all disputes, claims, claims for damages due to processing etc., which may be submitted to AB PROGETTI of the said third party whose Personal Data have been processed through your use of the Website in breach of the Applicable Law.

#### **c. Cookies and similar technologies**

AB PROGETTI collects Personal Data using cookies. You may find further information on the use of cookie and similar technologies [here](#).

### **1. PURPOSES OF THE PROCESSING AND VOLUNTARY OR OBLIGATORY NATURE OF PROVIDING THE DATA**

The Personal Data that you provide by using the Website will be processed by AB PROGETTI for the following purposes:

- a. Purposes related to the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (e.g., contact request made by using the "Contact Us" form available on the Website, registration to the on-demand service newsletter, gift card);
- b. Purposes related to research/statistical analyses on aggregated or anonymous data, without the possibility of identifying the data subject, aimed at measuring the functioning of the Website, traffic, usability, and interest;
- c. Purposes related to the compliance with a legal obligation to which AB PROGETTI is subject;
- d. Purposes necessary for the establishment, exercise or defense of legal claims or whenever courts are acting in their judicial capacity.

The legal basis for the processing of Personal Data for the purposes referred to in point a) is the provision of a service or the response to a request that does not require your prior consent under the Applicable Law.

The purpose referred to in point b) does not imply the processing of Personal Data, whilst the processing for the purpose referred to in points c) and d) constitutes a legitimate processing of Personal Data within the meaning of the Applicable Law because, once the Personal Data have been provided, the processing is indeed necessary to comply with a legal obligation to which AB PROGETTI is subject or for the establishment, exercise or defense of legal claims.

Providing your Personal Data for the above-mentioned purposes is voluntary, however, any refusal to provide such data may not allow AB PROGETTI to reply to your requests and to comply with legal obligations to which AB PROGETTI is subject.

### **1. RECIPIENTS**

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Your Personal Data may be disclosed, in close relation to the purposes specified above in section 3, only to:

1. subjects necessary for order fulfillment of the services offered through the Website e.g., sending e-mails and analyzing data, which typically process Personal Data on behalf of AB PROGETTI as data processors.
2. persons authorized by AB PROGETTI to process Personal Data, that are committed to/ or under an appropriate statutory obligation of confidentiality (e.g., employees and lawyers of AB PROGETTI) (a. and b. are hereinafter collectively referred to as “**Recipients**”);
3. law enforcement agencies and public authorities when so required by the Applicable Law.

### **1. TRANSFERS**

Some of your Personal Data are transferred to Recipients who may be established outside the European Economic Area. AB PROGETTI ensure that the processing of Personal Data by these Recipients is carried out pursuant to the Applicable Law. In fact, the transfer of Personal Data is based alternatively on an adequacy decision or the Standard Contractual Clauses issued by the European Commission.

### **1. DATA RETENTION**

AB PROGETTI will process your Personal Data only for the duration necessary to achieve the purposes described in section 3 (e.g., AB PROGETTI will process your Personal Data for the on-demand service “ICT Insider” until you will decide to unsubscribe). Apart from the above, AB PROGETTI will retain your Personal Data for a period of time necessary or permitted to comply with the Applicable Law (Artt.2946 and 2947(1)(3) of the Italian Civil Code). Further information regarding the period of retention of Personal Data and the criteria used to determine such period may be required writing to [privacy@abprogetti.com](mailto:privacy@abprogetti.com)

### **1. YOUR RIGHTS**

Pursuant to and to the extent allowed by the Applicable Law, you have the right, at any time, to request to AB PROGETTI access to, rectification, erasure, restriction of the processing concerning your Personal Data or to object to relevant processing activity and to receive in a structured, commonly used and machine-readable format the Personal Data concerning you.

Requests to exercise your rights must be sent to the following address: [privacy@abprogetti.com](mailto:privacy@abprogetti.com)

In any case, pursuant to the Applicable Law, you have the right to lodge a complaint with the relevant supervisory authority (the Italian Garante) if you believe that the processing of your Personal Data is against the Applicable Law.

### **1. AMENDMENTS**

This Privacy Policy came into force on 25 May 2018. AB PROGETTI reserves the right to amend or to update its content, whether in whole or in part, including following changes in the legal and regulatory obligations regarding data protection. AB PROGETTI will inform you on such amendments and updates through their publication on the Website as soon as they are adopted, and they will be binding from the moment of their publication. AB PROGETTI therefore invites you to visit this section of the Website

regularly in order to be aware of the most recent and updated version of the Privacy Policy, so that you are always updated on the processing activities that AB PROGETTI carries out.