

## **PRIVACY POLICY OF CANTARELLA & MOLTENI S.R.L.**

### **1. Scope**

This privacy policy, drawn up in compliance with EU GDPR 2016/679, explains how we collect and use personal data.

"Personal data" means any information relating to an identified or identifiable natural person; 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 their physical, physiological, genetic, mental, economic, cultural or social identity.

We collect personal data through various methods in the course of our ordinary business activities, both online and offline. This occurs, for example, when customers place an order or purchase products or services, enter into contracts or communicate with us, or visit and use our websites. We also receive personal data from our customers in order to provide services on their behalf.

### **2. Identity of the data controller (GDPR Art. 28)**

To identify the entity of CANTARELLA & MOLTENI S.R.L. responsible for the processing of your personal data, you may contact your commercial representative at CANTARELLA & MOLTENI S.R.L., or contact our privacy office by telephone or by e-mail at: info@cantarellaemolteni.it.

### **3. Categories of personal data (GDPR Art. 4)**

The personal data we may collect and process include:

- Contact data that enables us to communicate with you, such as first and last name, profession, age, title, username, address, telephone numbers, e-mail address or other addresses to which we may send messages, company information and registration data you enter on our website.
- Data relating to our commercial relationship with you, for example the types of products and services that may interest you, product and contact preferences, languages, creditworthiness, marketing preferences and demographic data.
- Transactional data relating to the way you interact with us, concerning for example purchases, requests for information, customer account data, information on orders and contracts, delivery data, billing data and bank details, tax information, transaction and correspondence history, and information on how you use and interact with our websites.
- Security and compliance data that enables us to protect our interests, including the information necessary for conflict checks, fraud prevention and internal audits, as well as the information necessary for the security of our premises, for example video recordings.
- Our products may collect information concerning the configuration, settings and operation of systems, event information or other data acquired in the course of the normal operation of our products. This information may include sensor data, equipment data, data concerning building spaces, energy consumption data, error data, event data, environmental data, other internal or external data, and information on product use and performance. In some circumstances, this information may constitute personal data. In the case of security or video surveillance products, the information may also include video and audio signals and data. The nature and extent of the data collected by our products will vary depending on the type and function of the products and the type of services for which they are used, within the limits established by applicable law.

### **4. Legal basis for processing (GDPR Art. 6)**

- The performance of contracts with our customers and suppliers.

- The legitimate interests of CANTARELLA & MOLTENI S.R.L., represented by our ordinary business activities.

## **5. Purposes of processing (GDPR Art. 13 and 14)**

- The fulfilment of orders for products or services and related activities, such as the delivery of products and services, customer support, the management of accounting records and invoices, training and support activities, product updates and the sending of safety notices, as well as the provision of other services connected with purchases.
- The management of our contractual obligations and customer relationships, in particular the management of customer interactions, the analysis and improvement of the products and services we offer, the communication of information on our products or services and the communication of special offers and promotions.
- The protection of our company's websites, networks, systems and premises, and protection against fraud.
- The management of our ordinary business needs, such as payment processing, accounting and financial management, product development, contract management, website administration, the fulfilment of obligations, corporate governance, audits, reporting and compliance.

## **6. Recipients of personal data**

- Third parties: we may use third parties that provide or perform services and functions on our behalf. We may make personal data available to these third parties for the purpose of performing the aforementioned services and functions. Any processing of such personal data will be subject to our instructions and compatible with the original purposes.
- Legally required disclosures: we may make personal data relating to certain individuals available to public or judicial authorities, law enforcement or other bodies provided for by law, for example for reasons of national security or public order requirements, as well as to authorities and courts of the countries in which we operate. Within the limits of the law, we may also disclose such information to third parties (including legal advisors) where this becomes necessary to bring, exercise or defend ourselves against legal action or otherwise enforce our rights, protect our property or the rights, property or safety of others or, where necessary, to support external audit, compliance and corporate governance functions.
- Mergers and acquisitions: personal data may be transferred to a party that acquires all or part of the assets of CANTARELLA & MOLTENI S.R.L. or its operating activities in the event of a sale, merger, liquidation, dissolution or other corporate transactions.
- Affiliates: we may also transfer and disclose such information to affiliates of CANTARELLA & MOLTENI S.R.L. in compliance with applicable law.

## **7. International transfers (GDPR Art. 44 to 49)**

The third parties, subsidiaries and affiliates to which we may disclose your personal data may be located in other countries; consequently, it is possible that the data may be transmitted to countries where privacy protection rules differ from those of your country of residence. In such cases, we will take appropriate measures to ensure that your personal data receives an adequate level of protection; these measures include our Binding Corporate Rules, which establish strict provisions for the processing of personal data that we acquire and process worldwide, as well as standard contractual clauses protecting your personal data.

## **8. Data retention (GDPR Art. 5(a))**

Personal data will be retained for the period necessary to achieve the purpose for which it was collected, usually for the duration of the contractual relationship and, subsequently, for the period prescribed or permitted by

applicable law.

## **9. Protection of personal data (GDPR Art. 25)**

Security measures for the protection of personal data: we adopt appropriate technical, physical and organisational measures in order to protect personal data against accidental or unlawful destruction, loss, alteration, disclosure, unauthorised access and any other form of unlawful processing. Access to personal data is limited to authorised recipients who have a well-founded need to know it. We adopt a comprehensive information security programme that is proportionate to the risks associated with the processing. This programme is periodically reviewed in order to mitigate operational risks and to protect personal data in light of accepted industry practices. We also adopt enhanced security measures for the processing of sensitive personal data.

How we protect the personal data we process on behalf of our customers (as data processors): in some cases we process personal data as a service on behalf of our customers (as data processors). In these cases we collect and process personal data according to the customer's instructions, and we neither use nor disclose it for our own purposes. We adopt information security control measures to protect the data thus collected and we undertake to disclose or transfer personal data solely in compliance with the customer's instructions or to provide the requested service. Unless otherwise instructed by customers, the personal data we process on their behalf is processed in line with our disclosure and transfer commitments.

## **10. Our website**

### **Cookies, usage data and similar tools**

When you visit our websites, we may acquire certain information by automatic means, using various technologies such as cookies, pixel tags, browser analytics tools, server logs and web beacons. In many cases, the information we collect through cookies and other tools is used in a non-identifiable manner, without any reference to personal data.

Cookies are small text files that websites transfer to your computer or to the hard drive of another device through the web browser you use to visit them. We may use cookies to make access to and use of our websites more efficient, to adapt them to your browsing preferences and to improve their functionality. Cookies may be used for performance management, and to collect information for analytical purposes on how our website is used. They may also be used for functionality management, allowing us to make users' visits more efficient by remembering, for example, language preferences, passwords and login details. There are two types of cookies: session cookies, which are deleted from the device when you leave the website; and persistent cookies, which remain on the device for longer or until they are manually deleted.

We may use Flash cookies (also known as local shared objects) and similar technologies to personalise and optimise users' online experience. Adobe Flash Player is an application that allows dynamic content, such as video clips and animations, to be developed quickly. Flash cookies are used for security purposes and to remember settings and preferences in a manner similar to that used by browser cookies, but they are managed through an interface different from the one contained in the user's web browser. To manage Flash cookies, please consult the Adobe website or visit [www.adobe.com](http://www.adobe.com). We may use Flash cookies or similar technologies for targeted behavioural purposes or to support interest-based advertising initiatives.

The logs recorded by our servers may also collect information on how users use the websites (usage data). This data may include the user's domain name, language, browser and operating system type, Internet service provider, IP (Internet Protocol) address, the site or referrer that directed the user to the website, the website the user was visiting before reaching our site, the website visited afterwards and the time spent on the website. We may monitor and use this data to measure the performance and activity of the website, improve its design and functionality, or for security purposes.

Our website may also use pixel tags and web beacons. These are tiny graphic images contained in web pages or in our e-mails that allow us to determine whether or not you have performed a certain action. When these pages are accessed, or when an e-mail is opened or clicked, the pixel tags and web beacons generate a notification relating to that operation. These tools allow us to measure the response to our communications and to improve web pages and promotions.

You can change your browser settings to block cookies, to be informed when you receive a cookie, to delete them or to browse our website using the browser's anonymous usage settings. To find out how to adjust or change these settings, you may consult the browser's instructions or help screen. If you do not agree with our use of cookies or other technologies that store information on your device, we invite you to change your browser settings. We note, however, that by disabling cookies or similar technologies, some functionality of our websites may not operate correctly.

Where required by law, you will be asked to consent to the use of certain cookies and similar technologies before they are used or installed on your computer or other devices.

- Data sharing and browser do-not-track requests: since we do not track visitors to our websites (nor do we allow others to track them), we do not process the do-not-track signals of web browsers.
- Linked sites: our websites may contain links to third-party websites ("linked sites"). Linked sites are not necessarily subject to review, control or examination by us. Each linked site may adopt its own terms of use and its own privacy policy, and it is necessary for users, when accessing such linked sites, to review and accept those terms. We assume no responsibility for the policies and practices adopted by linked sites, nor for other links contained in them. These links do not imply our endorsement of the linked sites or of any company or service, and we recommend that users carefully read the terms and notices of such sites before using them.
- Minors: our websites are not intended for minors and are not used to intentionally obtain personal information from minors or to carry out marketing activities towards minors. If we become aware that a minor has provided personal information through one of our websites, we will remove that information from our systems.
- Google Analytics: on our websites we may use Google Analytics to collect information about your online activity on our websites, for example regarding the web pages visited, the links you click or the searches conducted on our websites. This information may be used for reporting purposes and to enable us to improve the websites. Cookies collect various information in anonymous form, for example the number of visitors to the website, where they come from and the pages they have visited. The information generated by these cookies and your current IP address will be transmitted by your browser to Google, which will store it on servers located in the United States and other countries. Google will use this information on our behalf in order to evaluate the use of our website as described above. The IP addresses acquired through Google Analytics will not be associated with other data held by Google. For further information on the data collected through Google Analytics, you may visit <http://www.google.com/intl/en/analytics/privacyoverview.html>. To prevent the use of these cookies, you can select the appropriate settings in your browser. In this case, you may not be able to fully use the functionality of our websites. You can download and install the browser add-on for disabling Google Analytics from: <http://tools.google.com/dlpage/gaoptout>.
- Google remarketing technology: our websites may use Google's remarketing technology. This technology allows users who have already visited our online services and shown interest in our services to see targeted advertising on the websites of Google's partner network. These same remarketing initiatives may also be directed at users who are similar to visitors to our website. The information generated by cookies on the use of the website will be transmitted to and stored on Google's servers in the United States. If the IP address is transferred, it will be shortened by excluding the last three digits. The use of cookies allows user behaviour on the websites to be analysed and, subsequently, product recommendations and advertising messages to

be sent in a targeted manner on the basis of users' interests. If you prefer not to receive targeted advertising communications, you can disable Google's use of cookies for these purposes by accessing the website: <https://www.google.com/settings/ads/>. Alternatively, users can disable the use of cookies by third-party providers by accessing the opt-out website of the Network Advertising Initiative (<http://www.networkadvertising.org/choices/>). We note that Google adopts its own data protection policy, which is independent of ours. We are therefore in no way responsible for their policies and procedures. We recommend reading Google's privacy rules before using our websites (<https://www.google.com/intl/en/policies/privacy/>).

- Facebook conversion tracking: our websites may use the conversion tracking pixel, a service of Facebook Inc., 1601 S. California Ave., Palo Alto, CA 94304, USA ("Facebook"). This tool allows the actions of users who have been redirected to a provider's website after clicking on an advertisement on Facebook to be tracked. This makes it possible to record the effectiveness of advertisements on Facebook for statistical and market research purposes. The data collected remains anonymous, so we cannot trace the personal data of any specific user. However, the data collected is saved and processed by Facebook, which is able to link the data to users' Facebook accounts and use it for its own advertising purposes, according to the terms of the Data Policy available at: <https://www.facebook.com/about/privacy/>. Conversion tracking also allows Facebook and its partners to show advertisements to users both inside and outside Facebook. A cookie will be stored on the user's computer for these purposes. To give your consent you must be at least 16 years old. To withdraw your consent you can click here: [https://www.facebook.com/ads/website\\_custom\\_audiences/](https://www.facebook.com/ads/website_custom_audiences/).

## **11. Your rights (GDPR Art. 15)**

To request access to, rectification or updating of inaccurate or no longer valid personal data, you may contact our privacy office by writing to [info@cantarellaemolteni.it](mailto:info@cantarellaemolteni.it). Within the limits provided by law, you have the right to request the erasure of your personal data, the restriction of the processing of data concerning you, to object to its processing and to exercise the right to data portability.

You may also have the right to lodge a complaint with the supervisory authorities.

## **12. Consent and withdrawal of consent (GDPR Art. 7)**

In providing us with your personal data, you acknowledge and consent to the collection, processing, international transfer and use of such data as provided for in this privacy policy. Where required by law, you will be asked for explicit consent.

You will always have the option to object to the use of your personal data for direct marketing purposes or to withdraw any consent previously given for a specific purpose, free of charge, by following the instructions contained in the e-mails or by contacting our privacy office at the e-mail address [info@cantarellaemolteni.it](mailto:info@cantarellaemolteni.it).

## **13. Automated decision-making**

CANTARELLA & MOLTENI S.R.L. respects the rights provided by law regarding automated decision-making.

## **14. How to contact us**

To communicate with us regarding privacy-related matters, or to send us questions, comments or complaints, you may contact our privacy office by writing to the e-mail address [info@cantarellaemolteni.it](mailto:info@cantarellaemolteni.it).

## **15. Changes to our privacy policy**

We reserve the right to change, modify and update this privacy policy at any time. We recommend checking it periodically to be sure you have read the most up-to-date version.

This privacy policy became effective on: 25 May 2018.