### **PRIVACY POLICY**

Information document pursuant to and for the purposes of Article 13 of Regulation (EU) No 2016/679 (GDPR)



### WHY THIS INFORMATION

Pursuant to Regulation (EU) No 2016/679 (hereinafter, the "GDPR"), this page describes the methods of processing personal data. This Policy is provided pursuant to Art. 13 of the GDPR. The Policy is not to be considered valid for other third-party websites, which may be consulted through links on this website, for which no liability is assumed.

# Processable personal data

**Personal data:** any information concerning 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, identification number, location data, online identifier or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of said natural person (C26, C27 and C30 of the GDPR).

## Contractor/user data.

## **Browsing data**

The computer systems and software procedures used to operate this website acquire, during their normal operation, certain personal data, transmission of which is implicit in the use of internet communication protocols.

This category of data includes the IP addresses or domain names of the computers and terminals used by users, the URI/URL (Uniform Resource Identifier/Locator) addresses of the resources requested, 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 given by the server (successful, error, etc.) and other parameters relating to the operating system and computer environment of the user.

#### Data disclosed voluntarily

The optional, explicit and voluntary sending of messages to the contact addresses indicated on this site and/or the completion of data collection forms entails the subsequent acquisition of the sender's address, necessary for responding to requests, as well as any other personal data entered.

## Information about the processing of personal data carried out through Social Media platforms

With regard to the processing of personal data carried out by the managers of the Social Media platforms used by the Controller, please refer to the information provided by them in their respective privacy policies. The Data Controller processes the personal data provided by the user through the pages of the dedicated Social Media platforms, to manage interactions with the user (comments, public posts, etc.) and in compliance with current legislation.

# **Specific information**

Specific information may be found on the pages of the Site relating to particular services or processing of the data provided.



# Cookies and other tracking systems. What are they? What are they for?

For cookies and other tracking systems, see the Cookie Policy in the footer of the site and at the following link.



# 1. WHO IS THE DATA CONTROLLER? HOW CAN YOU CONTACT IT?

The Data Controller is **Fumagalli Industria Alimentari SpA**, with registered office in Via Briantea, 18 – 22038 Tavernerio (CO), in the person of its Legal Representative pro tempore, who can be contacted for any information by e-mail at <a href="mailto:privacy@fumagallisalumi.it">privacy@fumagallisalumi.it</a>.

## 3. PURPOSES OF THE PROCESSING, LEGAL BASIS, DATA RETENTION PERIOD AND NATURE OF PROVISION

PURPOSES OF THE PROCESSING	LEGAL BASIS	RETENTION PERIOD	NATURE OF PROVISION
Browsing on this website.	Processing is necessary for the purposes of the	Browsing data will	The provision of
, and the second	legitimate interests pursued by the Controller or by a	be retained for	data is necessary

The data necessary for the functioning of the web services are also processed to:  • obtain statistical information on the use of the services (most-visited pages, number of visitors per time slot or day, geographical areas of origin, etc.);  • check the correct	third party, provided that the interests or the fundamental rights and freedoms of the Data Subject which require protection of personal data are not overridden, taking into account the reasonable expectations of the Data Subject and the activities strictly necessary for the operation of the site and for browsing thereon (Article 6(1)(f) and C47 of the GDPR)	the duration of the browsing session.	for browsing on the website.
functioning of the services offered.			
Use of cookies and comparable technologies. See the Cookies Policy in the footer of the site	For the necessary non-technical cookies and comparable technologies, processing will be based on consent to the processing of personal data (Article 6(1)(a) and C42 and C43 of the GDPR).  Consent is given through the site's banner and Cookie Policy	See the Cookies Policy in the footer of the site	See the Cookies Policy in the footer of the site

In addition to browsing, personal data will be processed for:

PURPOSES OF THE PROCESSING	LEGAL BASIS	RETENTION PERIOD	NATURE OF PROVISION
A) CONTACTS, sending contact requests, information	/processing is necessary for the performance of a contract to which the Data Subject is party or to carry out precontractual measures adopted on his/her request; (C44) Article 6 (1)(b) of the GDPR	Maximum 12 months	Provision is necessary. Failure to provide the necessary data will make it impossible to be contacted and receive information
B) MANAGEMENT OF YOUR REQUESTS and requests from other Data Subjects, pursuant to articles 15 et seq. of the GDPR (rights of the Data Subject)	Processing is necessary for compliance with a legal obligation to which the Controller is subject (C45) Article 6 (1)(c) of the GDPR	5 years from the closure of the request, except for disputes	The provision of personal data is mandatory as it is essential for the fulfilment of the legal obligations.
A) SELECTION OF PERSONNEL IN THE WORK WITH US AREA, to apply for the selection of personnel, carry out research and selection of personnel to establish an employment relationship, including for any positions	/processing is necessary for the performance of a contract to which the Data Subject is party or to carry out precontractual	Maximum 12 months.  In principle, the data collected during the hiring process will be erased as soon as it	Provision is necessary.  Failure to provide the necessary data

PURPOSES OF THE PROCESSING	LEGAL BASIS	RETENTION PERIOD	NATURE OF PROVISION
different from those for which the Data Subject has spontaneously applied; retention of personal data for future selections; management of applications in response to job offers published on our website; interviews and any video interviews (data processing, including image/audio processing).  See specific information in the dedicated area	measures adopted on his/her request; (C44) Article 6 (1)(b) of the GDPR	becomes clear that no job offer will be made or that the offer will not be accepted by the candidate	will make it impossible to apply



# 4. TO WHOM WILL THE PERSONAL DATA BE DISCLOSED? DATA RECIPIENTS

The personal data will be communicated, including on the basis of purposes stipulated in specific areas, to subjects who will process the data as independent Data Controllers, or Data Processors (Article 28 of the GDPR) and processed by natural persons (Article 29 of the GDPR) acting under the authority of the Data Controller and Data Processors on the basis of specific instructions provided regarding the purposes and methods of processing, for specific purposes based on the reference area. The data will be disclosed to recipients belonging to the following categories:

- Parties that provide services for the website and communication networks, including e-mail, host and website management;
- For the work with us area, to subjects for the management of selection activities;
- Authorities competent to comply with legal obligations and/or provisions of public bodies, upon request

The list of Data Processors can be obtained by writing to <a href="mailto:privacy@fumagallisalumi.it">privacy@fumagallisalumi.it</a> or to the other addresses indicated above.



## 5. WILL THE DATA BE TRANSFERRED TO NON-EEA COUNTRIES?

Personal data will not be transferred to non-EEA countries.



## 6. IS THERE AN AUTOMATED PROCESS?

Personal data will be subject to traditional manual, electronic and automated processing. It should be noted that fully automated decision-making processes are not carried out.



# 7. WHAT ARE YOUR RIGHTS? HOW CAN YOU EXERCISE THEM?

You can exercise your rights as expressed in Articles 15 et seq. of the GDPR, by contacting the Data Controller at the e-mail address privacy@fumagallisalumi.it, or using the contact details indicated above. You have the right to request, at any time, access to your personal data (Article 15), rectification (Article 16), erasure (Article 17) or restriction of processing (Article 18). The Data Controller shall notify (Article 19) each of the recipients to whom the personal data have been disclosed of any rectification or erasure of personal data or restriction of processing carried out. The Data Controller shall inform the Data Subject of such recipients if the Data Subject so requests. You have the right to request the portability of your data (Article 20) in the cases provided for and, if you do, they will be provided to you in a structured, commonly used and machine-readable format. You have the right to object (Article 21), at any time, to the processing of data based on legitimate interest. In cases where the legal basis is consent, you also have the right to withdraw consent without affecting the lawfulness of the processing operations based on consent before such a

withdrawal. If the Data Subject considers that the processing of personal data carried out by the Data Controller has infringed the provisions of Regulation (EU) No 2016/679, the Data Subject shall have the right to lodge a complaint with the Supervisory Authority, in particular in the Member State in which he/she habitually resides or works or in the place where the alleged infringement of the regulation occurred (Privacy Guarantor https://www.garanteprivacy.it/) or to appeal to the appropriate courts.



# 8. CHANGES TO THE PRIVACY POLICY

The Data Controller reserves the right to amend, update, add or remove parts of this Policy. In order to facilitate the verification and amendment of the text, the Policy will contain the update date.

Date of update: 01/11/2022

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