

## **PRIVACY POLICY**

Pursuant to Article 13 of European Regulation 2016/679, concerning the protection of individuals with regard to the processing of personal data (hereinafter "GDPR"), **Sirap Gema S.p.A.**, with registered office in Verolanuova (BS), 25028 Via Industriale 1/3, (hereinafter "**Sirap**" or "**Data Controller**") henceforth provides certain information relating to the processing of your personal data during your visit to the website <http://www.sirapgema.it/> (hereinafter "**Website**").

### **Data controller and Data protection officer (DPO)**

The data controller is **Sirap Gema S.p.A.**, in the person of its pro tempore legal representative, with registered office in Verolanuova (BS), zip code 25028, at via Industriale, 1/3, telephone 03093681

The Data Protection Officer (DPO) can be reached at the e-mail address [dpo@sirapgroup.com](mailto:dpo@sirapgroup.com)

### **Personal data collection and processing**

#### **Browsing data**

The information systems and software applications used to operate this website acquire some personal data during their normal operation, the transmission of which is inherent in Internet communication protocols. This information is not collected to be associated with any identified person, but by its very nature it might lead to the identification of users, through processing and association with data held by third parties.

This category of data includes IP addresses or domain names of computers used by users connecting to the website, URI (Uniform Resource Identifier) of requested resources, time of the request, 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 server response (successful, error, etc.) and other parameters regarding users' operating system and computer environment.

These data are solely used to obtain anonymous statistical information about use of the website and to check the site correct functioning and are immediately deleted after processing.

These data could be used to ascertain liability in case of computer crimes committed against the website.

The data are immediately deleted after processing.

#### **Data provided voluntarily**

In some sections of the website, in relation to specific on demand services, you will be asked for some personal data. In such case, an information statement will be provided pursuant to art. 13 GDPR, concerning the processing of personal data for the individual purposes pursued.

### **Cookies**

For the use of cookies, we recommend that you read the additional information [by clicking here](#).

### **Purpose of processing, legal basis of processing and retention period**

The Data Controller will process your personal data for the technical administration and operation of the website as well as for the other purposes stated in the specific sections or pages of the Website.

The legal basis for this processing of personal data is contractual.

The data are immediately deleted after processing.

### **Processing methods**

The processing of personal data is based on principles of correctness, lawfulness and transparency. The processing of personal data may also be carried out through automated methods designed to memorize,

manage and transmit the data and will take place through technical and organizational measures suitable to ensure, among other things, the security, confidentiality, integrity, availability and resilience of systems and services, through the use of appropriate procedures that prevent the risk of loss, unauthorized access, unlawful use and dissemination.

Your Personal Data will be processed in accordance with the principle of necessity and proportionality, avoiding the processing of Personal Data if the transactions can be performed using anonymous data or using other methods.

### **Providing the data and consequences in case of refusal**

Except for what has been specified for browsing data, the provision of data for further processing purposes within the scope of on demand services is optional. Failure to provide them may make it impossible to pursue such further purposes.

### **Recipients**

Your data may be processed by external parties acting as independent data controllers such as, for example, authorities and supervisory and control bodies.

Pursuant to art. 28 of the GDPR, the Data Controller has also appointed third-party companies that process Personal Data on its behalf as external data processors giving them adequate operating instructions (hereinafter collectively referred to as "Data Processors" or "Processors"). These parties are essentially included in the following categories:

- companies that perform management services and technical maintenance of the website;
- companies that carry out statistical analysis and / or market research;

Your personal data will not be disclosed to third parties nor will they be disseminated.

### **Parties authorized to the processing**

Your Personal Data will be processed by employees and / or collaborators of the Controllers/Processors who have received adequate operating instructions and who have been expressly authorized to process them by the Controllers/Processors.

### **Transfer of data to countries outside the European Union**

Your personal data will not be transferred outside the European Union.

### **Your rights**

In relation to the processing of personal data carried out by the Data Controller, you can request the Data Controller to access your personal data, the cancellation of your data, the correction of inaccurate data, the completion of incomplete data, the limitation of processing in the cases provided for by art. 18 GDPR, and you may object to the processing where the owner has a legitimate interest.

Where the processing is based on consent or the contract and is carried out with automated tools, you have the right to receive your data in a structured format, commonly used and readable by an automatic device, as well as, if technically feasible, to transmit them to another controller without impediment.

Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with the relevant regulatory Authority in the Member State in which you habitually reside or in the State in which the alleged violation occurred.

To exercise your rights you may contact the Data Controller by sending a written notice to the address specified above or an e-mail to [morethanpackaging@sirapgroup.com](mailto:morethanpackaging@sirapgroup.com).

**Last updated: May 2019**