

Privacy Policy

INFORMATION PURSUANT TO ART. 13 and 14 EU REGULATION 2016/679 – INTERNET SITE

F.I.D.E.A S.p.A., P.iva 01152510424 with registered office in Jesi at Via Pasquinelli n. 2/a (AN) in the person of the lawyer representative as Data Controller (hereinafter: “F.I.D.E.A.” or “Data Controller”) pursuant to Regulation (EU) 2016/679 (so-called General Regulation for the Protection of Personal Data, hereinafter “Regulation”) and of the Legislative Decree no. 196/2003 (so-called Code regarding the protection of personal data, hereinafter the “Code”) – considers the protection of your personal data, a fundamental aspect of our business. All the information you’ll need provide will be treated with the sole principle of respect for your rights, your fundamental freedoms and of your dignity.

The principles applied to the processing of personal data are those dictated by art. 5 of the GDPR: correctness, lawfulness, transparency, purpose and retention limitation, minimization and accuracy, integrity and confidentiality, as well as the principle of accountability.

This Policy:

- refers to the site www.fidea.com (hereinafter: “Site”);
- forms an integral part of the Site and the services we offer;
- is made, pursuant to articles 13 and 14 of the Regulation, to those who interact with the site’s services, either through the simple consultation that through the use of specific services made available through the site (by way of by way of example, the purchase of products, the compilation of forms to request information or to register to the newsletter, etc.), as well as with the other services provided (telephone assistance and assistance via email).

This information does not concern other sites, pages or online services that may be reached via links published but referred to external resources. We therefore invite you to read the following information carefully.

1) OWNER OF THE TREATMENT

The Data Controller is F.I.D.E.A. S.p.A., VAT 01152510424, with registered office in Jesi at Via Pasquinelli n. 2/a (AN), in the person of the legal representative p.t. tel.: **0737 7840**. e-mail: **info@fidea.com**.

2) CATEGORIES OF DATA PROCESSED THROUGH THE SITE

The personal data processed are those communicated by you or legitimately retrieved by the Data Controller. The types and the methods of processing data relating to the site are described below:

a. Navigation data

The computer systems and software procedures used to operate the Site acquire, during their normal operation, some personal data whose transmission is implicit in the use of communication protocols Internet. This is information that is not collected to be associated with identified interested parties, but for their very nature could, through processing and association with data held by third parties, allow identify users. This category of data includes IP addresses or computer domain names used by users

who connect to the Site, the addresses in URI (Uniform Resource Identifier) notation of the resources required, the time of the request, the method used in submitting 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 user's operating system and IT environment. This data comes used for the sole purpose of obtaining anonymous statistical information on the use of the Site to check its correctness functioning, to identify anomalies and/or abuses; in any case they are canceled immediately after processing. The data could be used to ascertain responsibility in case of hypothetical computer crimes against of the Site or third parties.

1. **Data collected through tracking (cookies).** Tracking is done by code performed within websites both at the server level (e.g. services, procedures) and at the client level (e.g. tags, pixel), also with the support of code installed on your browser (e.g. *cookie*). As for the purpose and management of consent relating to tracking, please refer to the specific section "*Information cookie*" of our website.
2. **Content sharing data via Social Networks.** The website indicated in the introduction could include plugins and/or buttons in order to allow the sharing of contents on Social Networks (Facebook, Instagram, LinkedIn) used by you.
3. **Data voluntarily provided by the user:** data voluntarily entered in the various forms content within the site, such as, for example:

– the information request form in the section "**Contacts**", through which you will be asked to enter your name, surname and contact details – email address and telephone number – as well as to formulate your specific request, which may possibly contain further personal data of yours;

– the "Work with us" form, through which you can send applications for job positions;

– the customer service via switchboard or email, through which you will be put in communication with an operator by F.I.D.E.A. who will be able to assist you by responding in real time to your requests for information.

With reference to these types of data, we invite you to enter them in the aforementioned forms or communicate via the channels of customer service, only the personal data strictly necessary for the purpose of managing your request, thus excluding information that is not pertinent and/or that may fall within the category of particular categories of data personal data pursuant to art. 9 of the Regulation.

Data processed on the basis of the services provided online: data voluntarily provided for the purpose the execution of the services offered online, with particular reference to the following services:

– filling in the form for the purpose of sending applications form "work with us";

– management of the information service and customer care

– registration and access to your personal area, within which they may be processed (based on the data from saved) your personal data, contact details, your shipping addresses, your product preferences. The data any credit cards will be managed through an external service provider, in accordance with the law current;

– conclusion and execution of purchase contracts (including order status verification service), in which your personal data, contact details and delivery address details will be processed products purchased as well as any information relating to your shopping experience, including confirmation of

purchase payment. In this regard, the company chosen for the management of payments, qualified as the independent owner of the treatment, will communicate to F.I.D.E.A. the circumstance of the payment and the necessary information upon shipment of the order. No data relating to the payment (if not confirmed), will be processed directly by F.I.D.E.A.;

- logistics and shipping with communication of shipping data to the person appointed as the external manager in charge of logistics and shipments;
- management of guarantees through the Customer care service;
- carrying out any returns or withdrawals, in the context of which your personal data will be processed, of contact and relating to the address of any collection of returned products as well as any information relating to your purchase and return experience;

3) PROCESSING METHODS: the Data Controller will process the data using IT methods. The related data to promotional and general profiling purposes will be processed through decision-making processes NOT exclusively automated but with human involvement.

4) FOR WHICH PURPOSES WE USE YOUR DATA – WHAT CONDITION MAKES THE TREATMENT LEGAL – HOW LONG WE STORE YOUR DATA

A) PURPOSE: provision of all the services made available by the Data Controller (such as, by way of example and not exhaustive, that of sending applications, online sales, making returns and the service relating to the management of the product warranty, the management of the “**Contacts**” section – relating to your customer care requests -, checking the status of orders placed, saving addresses delivery preferences for the goods purchased, etc.), including the management of the site’s security, as well as the contractual relations and administrative accounting and after-sales services. It should also be noted that, through the site, additional assistance services are made available to the Customer including, in particular, the service of telephone assistance and the assistance service via email, through which you can formulate specific requests and receive assistance from the F.I.D.E.A. customer service.

LEGAL BASIS: art. 6, par. 1, lit. b) of the Regulation ([...] the processing is necessary for the execution of a contract of which the interested party is a part or to the execution of pre-contractual measures adopted at the request of the same), as the treatments are necessary for the provision of services. The provision of personal data for these purpose is optional, but failure to provide it would make it impossible to activate the services required.

STORAGE TIMES: the data will be kept for the time strictly necessary to reach them purposes, i.e. for the time necessary for the execution of the contract, for the provision of legal guarantees or conventional, in compliance with the retention times required by law (see also, in particular, art. 2946 of the civil code et seq.).

B) PURPOSE: registration in private areas and activation of your account.

LEGAL BASIS: art. 6, par. 1, lit. b) of the Regulation ([...] the processing is necessary for the execution of a contract of which the interested party is a part or to the execution of pre-contractual measures adopted at the request of the same), as i treatments are necessary for the provision of services. The provision of personal data for these purposes is optional, but failure to provide it would make it impossible to activate the requested services.

CONSERVATION TIME: until the account cancellation request. With immediate data destruction following of the cancellation request.

C) PURPOSE: to find specific requests addressed to the Owner, also in relation to after-sales, including requests for customer assistance and information (e.g. relating to product warranty management) forwarded by filling in the relevant contact forms on the site, as well as through the line dedicated telephone number and contact email.

LEGAL BASIS: art. 6, par. 1, lit. b) of the Regulation ([...] the processing is necessary for the execution of a contract of which the interested party is a part or to the execution of pre-contractual measures adopted at the request of the same), as i treatments are necessary for the provision of services. The provision of personal data for these purposes is optional, but failure to provide it would make it impossible to activate the requested services.

STORAGE TIMES: the data will be kept for the time strictly necessary to reach them purposes, i.e. for the time necessary for the execution of the contract, for the provision of legal guarantees or conventional, in compliance with the retention times required by law (see also, in particular, art. 2946 of the civil code et seq.).

D) PURPOSE: management of customer orders.

LEGAL BASIS: for the management of orders art. 6, par. 1, lit. b) of the Regulation ([...] the treatment is necessary to the execution of a contract of which the interested party is a part or to the execution of pre-contractual measures adopted on request of the same), as the treatments are necessary for the provision of services. The provision of data data for these purposes is optional, but failure to provide it would make it impossible to activate the requested services.

STORAGE TIMES: For the management of orders, the data will be kept for the time strictly necessary achieve those same purposes, i.e. for the time necessary for the execution of the contract, for the performance of the legal or conventional guarantees, in compliance with the retention times required by law (see also, in particular, art. 2946 of the civil code et seq.).

E) PURPOSE: to fulfill any obligations established by current laws, regulations or community legislation, o satisfy requests from the authorities.

LEGAL BASIS: art. 6, par. 1, lit. c) of the Regulation ([...] the processing is necessary to fulfill a legal obligation to which the data controller is subject). Once the personal data have been provided, in fact, the treatment is truly necessary to fulfill legal obligations to which the Data Controller is subject.

STORAGE TIME: Personal data processed for the purposes referred to in this section will be kept until at the time foreseen by the specific obligation or applicable law.

F) PURPOSE: direct sending of advertising material and commercial communications via e-mail in relation to products or services similar to those purchased, pursuant to art. 130, paragraph 4 of the Code as well as the Provision of the Authority Guarantor for the protection of personal data of 19 June 2008, unless you expressly refuse to receive them communications, which you can express when registering on the site or on subsequent occasions.

LEGAL BASIS: Art. 6 par. 1 letter f) of the European Regulation 679/2016 (.....The treatment is necessary for the pursuit of the legitimate interest of the Data Controller...) With reference to this purpose, it should be noted that if the The Data Controller uses the e-mail coordinates provided for the purpose of direct sales of its products or services by the interested party in the context of the sale of a product or service, may, pursuant to art. 130, paragraph 4 of the Code, do not request the consent of the interested party, provided that the products or services are similar to those object of the sale and the

interested party, adequately informed, does not refuse such use, initially or on the occasion of subsequent communications.

STORAGE TIMES: your personal data will be processed until you object to the processing.

G) PURPOSE: general profiling purposes, without personalized repercussions, through the performance of analyses general (also of a predictive or strategic orientation type) aimed at the creation of statistical processing e calculation models in relation to the entire customer base; this purpose involves the processing of your data on a basis aggregated and in pseudonymised form. No legal effects or significant consequences will derive from this treatment on the personal sphere of the interested party. The decision-making processes resulting from the analysis of the aggregated data will be based on processing that will involve human resources and NOT exclusively through automated processing.

LEGAL BASIS: the processing referred to in this section is carried out in order to pursue the legitimate interest of the Owner pursuant to art. 6, par. 1, lit. f) of the Regulation.

STORAGE TIMES: your data will be stored no later than seven years from registration. Upon expiry of conservation term of seven years (if earlier), the data processed for the aforementioned purpose will be permanently deleted or anonymised.

H) PURPOSE: to satisfy any defensive needs.

LEGAL BASIS: satisfy any defensive needs of the Data Controller pursuant to art. 6.1. lit. f) of the Regulation.

STORAGE TIMES: personal data are stored for the entire duration of the complaint and/or proceeding out-of-court and/or judicial until the exhaustion of the terms of enforceability of the judicial protections and/or actions of appeal.

I) PURPOSE: purposes of evaluation and statistical monitoring; this purpose implies an analysis of aggregated information not referable to identified or identifiable natural persons and which, therefore, do not constitute personal or non-personal data allow the Owner to trace your identity in any way. This treatment does not have data as its object personal data, does not fall under the scope of the legislation on the protection of personal data and may be, therefore, freely carried out by the Data Controller.

In general, the Owner reserves the right in any case to keep your data for the time necessary to fulfill each any regulatory obligation to which the same is subject or to satisfy any defensive needs. In fact, it remains safe the possibility for the Data Controller to keep your personal data for the period of time foreseen and admitted by the Italian law to protect your interests (Art. 2947 of the Civil Code).

5) RECIPIENTS OF PERSONAL DATA

Your personal data may be shared, for the purposes set out in section 4 of this Privacy Policy, with:

- persons authorized by the Data Controller to process personal data pursuant to articles 29 and 2-quaterdecies of the Code (e.g. sales, administration and accounting personnel, after-sales assistance and management information systems, etc.);
- third parties who, in the provision of services (for example: technological services, assistance services and consultancy in accounting, administrative, legal, tax and financial matters, technical maintenance, services transport, banking and insurance services), typically act as data processors

pursuant to of the art. 28 of the Regulation. The Data Controller keeps an updated list of the appointed data processors and of them guarantees acknowledgment to the interested party at the office indicated above or upon request addressed to the contact details indicated above;

– subjects, bodies or authorities to whom it is mandatory to communicate your personal data by virtue of the provisions of the law or of orders from the authorities.

These subjects are, hereinafter, collectively defined as “Recipients”.

6) TRANSFERS OF PERSONAL DATA

Your personal data is shared with Recipients located only within the EU.

7) RIGHTS OF THE INTERESTED

As an interested party, you can exercise the rights referred to in articles 15-22 GDPR and revoke the consents at any time provided without prejudice to the lawfulness of the processing carried out before the revocation.

In particular, you can request access to your Personal Data pursuant to art. 15 GDPR, the rectification pursuant to of the art. 16 GDPR, the cancellation of the same pursuant to art. 17 GDPR, the limitation of the treatment in the cases provided for by art. 18 of the GDPR as well as to obtain the portability of data concerning you in the cases provided for by art. 20 of the GDPR. You can make a request for opposition to the processing of your data pursuant to art. 21 and 22 of the GDPR in which to give evidence of the reasons justifying the opposition: the Data Controller reserves the right to evaluate your request, which will not come accepted in the event of the existence of compelling legitimate reasons for proceeding with the processing that prevail over yours interests, rights and freedoms.

Requests must be sent in writing to the Data Controller at the addresses indicated in the section “**Contacts**” of this statement.

8) CLAIM TO THE GUARANTOR

If you believe that the processing of your Personal Data by the Data Controller is in violation of the provided for by the GDPR, you have the right to lodge a complaint with the Privacy Guarantor, as provided for by art. 77 of the GDPR itself, o to appeal to the appropriate judicial offices (Article 79 of the GDPR).

9) CHANGES

The Owner reserves the right to modify or simply update its content, in part or completely, also due to reasons of changes in the applicable legislation. The Data Controller therefore invites you to visit this section regularly take note of the most recent and updated version of the **Privacy Policy** in order to always be updated on the data collected and on the use made of it by F.I.D.E.A..

10. CONTACT US

To exercise the above rights or for any other request, you can write to the Data Controller at the physical address indicated above, or through the **telephone contact** or **dedicated email**, preferably, inserting in the subject of the notice the wording “request to exercise privacy rights”.