

## Privacy Policy of the <https://www.website.tecnovernici srl.com>

This information is issued pursuant to Articles 12, 13 and 14 of EU Regulation 2016/679 GDPR and is addressed to users of the website.

The following applies only to the website whose domains or properties are registered or attributable to the publisher **Tecnovernici s.r.l.**, in particular to the **tecnovernici srl.com** domain and all third-level domains linked to it.

The processing of your personal data will be based on the principles of lawfulness, fairness, transparency, purpose and storage limitation, data minimization, accuracy, integrity and confidentiality.

### 1 WHO IS THIS DOCUMENT FOR?

This Information (hereinafter referred to as the "Policy"), provided pursuant to Articles 13 and 14 of Regulation (EU) No. 679 of 27 April 2016 (the so-called "GDPR"), is aimed at illustrating how **Tecnovernici s.r.l.** (hereinafter also referred to as "**Company**" or simply "**Tecnovernici**") processes personal data collected in the context of the use by the user of the applications and services offered through this website.

### 2 HOW CAN YOU CONTACT US?

**Tecnovernici s.r.l.** as a Data Controller is responsible to you for any questions, concerns or complaints regarding this policy or the processing of your personal data. As a user of the website and a "data subject" who needs any clarification regarding the processing of your personal data, please contact us at the following addresses:

#### **Tecnovernici s.r.l.**

Registered office: Via del Lavoro 5 – 40065 Pianoro (BO)

VAT: 02123811206 - Cod. REA: BO – 415487

PEC: [pec@tecnovernici srl.com](mailto:pec@tecnovernici srl.com)

Telephone +39 051 6517021

email: [info@tecnovernici srl.com](mailto:info@tecnovernici srl.com)

### 3 WHY CAN WE PROCESS YOUR DATA?

The processing of your personal data is only lawful if there is a valid legal basis under the GDPR. The following legal bases are used for the processing considered in this policy:



#### **Consent - Art. 6.1 letter a) GDPR**

You have given your consent to the processing of your personal data for one or more specific purposes.



#### **Contract - Art. 6.1 letter b) GDPR**

The processing is necessary for the performance of a contract to which you are a party or for the execution of pre-contractual measures taken at your request.



#### **Legal obligation - Art. 6.1 letter c) GDPR**

The processing is necessary for compliance with a legal obligation to which you are subject or our company is subject.



#### **Legitimate interest - Art. 6.1 letter f) GDPR**

The processing is necessary for the purposes of a legitimate interest pursued by our company or by a third party, provided that your interests, fundamental rights or freedoms are not overridden.

## **4 FOR WHAT PURPOSES DO WE PROCESS YOUR PERSONAL DATA AND ON WHAT LAWFUL BASIS?**

We process your personal data to provide you with the best possible experience when you access our website, use our services and interact with us. This includes the following purposes:

### **4.1 TO ALLOW YOU TO VISIT OUR WEBSITE**

When you visit our website, we automatically collect certain information, including your IP address, login details, browser type and version, browser plug-ins, operating system, and platform. To collect this data, we use various technologies, including cookies. More information about cookies can be found in a specific paragraph of this policy. If you need further information regarding the processing of your personal data, please contact us using the information we have provided previously.



**Acquisition methods:** The data are automatically provided by your browsing devices through the communication protocols of the Internet network (e.g. TCP/IP, UDP)



**Basis of lawfulness:** We process this data on the basis of our legitimate interest - *Art. 6.1 lit. f) of the GDPR* - to provide and improve navigation on our Site, offer efficient and secure web services trying to ensure the continuous improvement of the browsing experience over time.



**How long we keep data:** We only keep personal data for as long as necessary to enable you to browse the Site. In particular, some data are stored for the duration of their stay on the Site itself and others until you decide to delete them by deleting technical and functional cookies (e.g. language setting). For more information on cookie management, see our [Cookie Policy](#);

### **4.2 MANAGE COMMUNICATIONS**

We collect your personal data when you communicate with us in person, through our website, email, by telephone or by any other means using the contact information we have provided through this Site.



**Acquisition methods:** The data are partly automatically provided in the communication protocol used by the chosen tool and partly are provided in the content of the communication.



**Basis of lawfulness:** We mainly process this data on the basis of our legitimate interest - *Art. 6.1 lit. (f) GDPR* - to respond to requests and manage necessary communications. However, in some cases we may be held liable by virtue of specific contractual or legal obligations - *art. 6.1 lit. (b) and lett. (c) GDPR*.



**How long we keep your data:** Following up on contact or support requests you choose to send us, your personal data is only processed for as long as necessary to provide you with the information and/or assistance you need. The data is deleted after 12 months from the last response we send.

#### 4.3 ADMINISTRATION AND SECURITY OF THE SITE

We process your data to administer and maintain our Site securely, including to ensure that it functions properly, including troubleshooting and understanding any errors encountered during your use by you or other users; In addition, we process the data collected on our website to maintain, manage and appropriately administer the IT systems and services necessary for its operation; We also collect this data through our security systems (e.g. Antivirus and Firewall) when you browse our web pages or if you use our services or web applications.



**Methods of acquisition:** The data are partly voluntarily provided through registration to our services and partly acquired automatically through communication protocols and your activities on the pages of the Site.



**Lawful basis:** We process this data by virtue of our legitimate interest in administering the Site, ICT systems and ensuring their availability, integrity and confidentiality. - *art. - 6.1 lett. (f) GDPR*.



**How long we keep YOUR data:** We only keep your personal data for as long as necessary to achieve the purposes described above.

#### 4.4 LEGAL REPORTING OBLIGATIONS

We may process your data in order to make necessary communications, in response to requests that we are legally required to comply with, to law enforcement or judicial authorities or in defense of legal claims.



**Method of acquisition:** The data are already in our possession as they are collected for other purposes.



**Basis of lawfulness:** The processing is necessary to comply with a legal obligation - *art. 6.1 lett. (c) GDPR* to which our company is subject.



**How long we keep YOUR data:** We keep your personal data for as long as necessary to fulfill our obligations.

#### 4.5 FURTHER STORAGE OF PERSONAL DATA

After the expiry of the above-mentioned retention periods, we may anonymise your personal data and store it indefinitely in this way.

## 5 WHO MAY PROCESS YOUR PERSONAL DATA

In order to achieve the purposes indicated above, the following subjects may have access to your personal data:

- at. Our employees and collaborators are adequately trained in the measures to protect your rights and the security of your data. They act as authorized and competent subjects in the field.
- b. We collaborate with companies, professional firms and consultants specialized in assistance and / or consultancy. In addition, we engage third parties to ensure the proper functioning of our website and its services. For example, we rely on service providers, cybersecurity experts, and other third parties to improve, extend, and protect our website and information technology systems. Each external party is carefully evaluated in terms of competence and reliability, and is contractually bound to guarantee a high level of protection of your personal data. These subjects act as Data Processors pursuant to art. 28 of the GDPR.
- c. We may communicate your data to administrative, institutional, judicial or other parties for whom communication is mandatory by law or necessary for the purposes described in this policy. These subjects will process the data in their capacity as Data Controllers.

## 6 COOKIES AND OTHER TECHNOLOGIES

The site uses only technical/proprietary cookies necessary for its proper functioning and for storing the preferences expressed through the cookie banner (ELMO). No profiling cookies or third-party cookies are installed.

- Purpose and legal basis: technical cookies allow the use of the site (e.g. navigation between pages, session management, security) and the recording of the user's choices on the banner (consents/refusals). The legal basis is the execution of pre-contractual/contractual measures and the legitimate interest of the Data Controller to provide a secure and usable site (art. 6.1, lett. b/f GDPR).
- Types in use:
  - o Session (technical) cookies, which are deleted when the browser is closed;
  - o Preference/consent (technical) cookies, which remember the user's choices on the banner for a limited period (typically up to 12 months).
- Manage your preferences: you can always change your choices via the "Change cookie preferences" link on the site (footer).
- Absence of third parties: At present, the site does not use third-party analytics, marketing or other trackers. In the event of future introduction of these technologies, updated information will be given and consent will be requested through the banner.

## 7 WHAT ARE YOUR RIGHTS?

In accordance with applicable law and in the circumstances determined by the lawful bases under which your personal data is processed, you may exercise the following rights.

- (a) **Right of access to personal data.** You have the right to obtain confirmation as to whether or not we are processing personal data concerning you and, where that is the case, to obtain access to the personal data being processed. You have the right to obtain a copy of the data being processed. This right is only applicable if it does not adversely affect the rights and freedoms of others. Please note that in the event of repeated requests, we may charge you a fee based on our administrative costs.

- (b) **Right to rectification, erasure or restriction of the processing of your personal data.** If you wish to rectify, erase or restrict the processing of your personal data, please contact us using the information we have provided in this section. It is your responsibility to ensure that you provide true, accurate, complete data and keep it up to date (e.g. account).
- (c) **Right to withdraw consent.** If you have given us consent to process your data, you can revoke it at any time.
- (d) **Right to data portability.** If the processing is based on your consent or contract and is carried out by electronic means, you have the right to receive the personal data concerning you that you have provided to us in a structured, commonly used and machine-readable format and you have the right to transmit these data to another controller without hindrance from us. Please note that this right does not apply to processing carried out through our website
- (e) **Right to object.** As a user, you have the right to object to the processing of your data in certain circumstances. For example, you may benefit from this right if the processing is based on our legitimate interests (or those of a third party). You may contest the merits of our legitimate interests, however, we may have the right to continue to process such personal data on the basis of our legitimate interests or when this is relevant in relation to legal claims, or the data is necessary for the establishment, exercise or defence of legal claims. You also have the right to object to the processing of your personal data for direct marketing purposes.
- (f) **The right not to be subjected to automated decision-making.**
- (g) **Right to lodge a complaint with the supervisory authority.** Without prejudice to the possibility of contacting our Company to exercise the rights related to the processing carried out by us, you may lodge a complaint with the competent independent administrative authority in the Member State of the European Union where you habitually reside, where you work, or where an alleged violation of the law on the protection of your personal data has occurred. In Italy, you can lodge a complaint with the following supervisory authority:

|                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                            |
|-------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  | <b>Guarantor for the protection of personal data</b>                                                                                                                                                                                                                                                                                                                                                                       |
|                                                                                     | Switchboard: +39 06.696771<br>E-mail address: <a href="mailto:garante@gpdp.it">garante@gpdp.it</a><br>PEC address: <a href="mailto:protocollo@pec.gpdp.it">protocollo@pec.gpdp.it</a><br>Website: <a href="https://www.garanteprivacy.it">https://www.garanteprivacy.it</a>                                                                                                                                                |
|                                                                                     | <b>Forms for exercising YOUR rights</b><br>To exercise YOUR rights towards the owner, you can use the following form:<br><a href="https://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/1089924">https://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/1089924</a><br>Remember that in order to allow you to exercise HIS rights, your identification is required on our part. |

## 8 DATA SECURITY

We have taken a number of physical, technical and organisational measures to ensure adequate levels of security for the personal data processed under our control, so as to prevent all reasonably foreseeable risks, including but not limited to their destruction, loss, alteration or unauthorised disclosure or accidental or unlawful access.

The data provided is stored and archived on secure servers in the European Economic Area

## **9 INTERNATIONAL TRANSFERS**

Our personal data processing operations generally take place within the European Economic Area ('EEA'). However, if your personal data is transferred to countries located outside the European Economic Area (EEA), in the absence of an adequacy decision from the Commission of the European Union, we will ensure that appropriate safeguards are in place to protect the personal data of our applicants in these countries. Some of the safeguards that could be adopted, where appropriate, include the use of the "Standard Contractual Clauses" (SCCs) established by the European Commission pursuant to art. 46, par. 1, GDP, pseudonymization and, if possible, encryption of the data themselves.

The transfer of personal data abroad is often linked to the use of cloud technologies, digital communication systems, security software and protection of IT services. In these cases, our Company undertakes to use services chosen from among the operators that guarantee greater standards of security and attention to the protection of personal data. In this regard, we inform you that we use some ICT services, provided by US companies (e.g. Microsoft 365 and Google) that have joined the EU-US Data Privacy Framework (DPF) (<https://www.dataprivacyframework.gov/s/>).

## **10 CHANGES TO THE POLICY**

This information may be subject to amendments and additions, also as a consequence of the updating of the applicable legislation relating to the protection of natural persons with regard to the processing of personal data as well as the free movement of such data.

*Policy updated on October 2, 2025.*