

# MARSILLI

## PRIVACY POLICY

### Privacy Policy - (Navigation of the website [www.marsilli.com](http://www.marsilli.com))

This policy is provided pursuant to Legislative Decree 196/2003 (as amended by Legislative Decree 101/2018, which adapted the national legislation to the GDPR - EU Regulation 2016/679) and **insofar as the interested party is a user of the website.**

### WHO IS THE CONTROLLER OF PERSONAL DATA PROCESSING

Marsilli S.p.A. (hereinafter the "**Company**"), with headquarters in Italy, Castelleone (CR), Via Per Ripalta Arpina 14.

The Company is the Data Controller of the personal data collected.

The list of the data processors is available at the above-mentioned headquarters of the company.

With reference to the subsidiaries of Marsilli Group with headquarters in the EU, details of the data controller are listed below:

Group Company	Contact details of the Data Controller
Marsilli Deutschland GmbH	Albert Nestler Str.13 - 76131 Karlsruhe

### CONTACTS

The contact details of the Company, as data controller, may be requested at the following e-mail address: [privacy@marsilli.it](mailto:privacy@marsilli.it)

### WHAT PERSONAL DATA MAY BE COLLECTED

The following categories of personal data about you may be collected.

- Contact details** – information relating to name, title, telephone number, mobile number, e-mail address.
- Navigation data/ Log files**– IP address, name of the internet service provider (ISP), type of browser and parameters used, information regarding date and time of access, pages visited and activities carried out. This data could also be processed through cookies, please read the site's Cookie Policy.

### HOW WE COLLECT PERSONAL DATA

The Company collects and processes your personal data in the following circumstances:

- through any mailing services found in the website
- general navigation on the website
- when other companies of the Group or business partners lawfully transfer your personal data to us.

Please help us keep your personal data up-to-date, notifying us should there be any changes.

### FOR WHAT PURPOSES MAY PERSONAL DATA BE USED

#### a) Security of the website and mailing services contained herein

The Company may process your Personal Data for following purposes:

- the data in the log files is collected to guarantee the functionality and the security of the site, of the networks and of information
- reply to emails received using the user of the mailing services of the website
- no data is used for profiling user/customer, meant as an analysis of personal preferences or tastes, as our product and the related activities are not for direct personal use.

Prerequisite to processing: legitimate interests

**b) Legal disputes, compliance to legally binding requirements to fulfil a legal obligation**

The Company collects your Contact data to fulfil a legal obligation and/or to defend its rights in a court of law.

Prerequisite to processing: legal obligations to which the company must comply and/or legitimate interests.

## **HOW WE STORE AND PROTECT PERSONAL DATA**

All your personal data is stored in both our computer and hard copy archives, or on those of our service providers for storage. It is accessible and usable according to our standards and our IT security policies.

The personnel authorized to process your data in accordance with the Privacy Policy is duly trained and authorized in function of the activities to be carried out and the tasks assigned.

The Company uses all the necessary security measures to guarantee security, confidentiality, integrity and availability of your personal data by means of a security system ISO/IEC 27001 certified.

## **HOW LONG INFORMATION IS RETAINED**

We retain your personal data only for the time necessary to achieve the purposes for which it was collected or for any legitimate related purpose. Therefore, if personal data is processed for two different purposes, we will store the data for a period of time equivalent to the purpose with the longer term. However, your personal data will no longer be processed for the purpose whose retention period has ceased.

The access to your personal data is limited to personnel who need to process the data for relevant purposes.

Personal data that is no longer necessary, or for which there is no legal requirement for storing it, is irreversibly anonymised (and in this way it can be stored) or securely destroyed.

Below are the storage times in relation to the different purposes listed above:

- a) Security of the website and of the mailing services contained herein: the processed data may be retained for the time necessary to carry out the specified activities, respecting the principle of minimization
- b) In case of legal disputes: should it be necessary to defend ourselves or to act or even submit claims against yourself or third parties, we can retain personal data that we consider reasonably necessary to process for such purposes, for the possible duration of said claim.

## **WHO MAY WE SHARE PERSONAL DATA WITH**

Your personal data can be accessed by salespersons, duly authorized employees as well as by external suppliers, nominated, if necessary, as responsible for the processing of personal data and who provide support in providing services.

Your data may also be transferred to companies within the Marsilli Group, including outside the EU; in this case, the controller will verify the respect of articles 44 and 45 of the GDPR.

## **DATA PROTECTION RIGHTS AND THE RIGHT TO SUBMIT CLAIMS**

Pursuant to the GDPR, the Company would also like to inform you that - where the conditions exist - you can exercise the following rights:

- to access your personal data;
- to copy the personal data you provided (so-called portability);
- to correct data held by the Company
- to delete any data for which there is no longer a legal prerequisite for its processing;
- to revoke your consent if the processing is based on consent or if it is directly related to a direct marketing activity;
- to restrict the way your personal data is processed, within the limits required by the legislation on the protection of personal data.
- to object to processing when provided by the applicable legislation.

The exercise of these rights is subject to a few exceptions aimed at safeguarding public interests (for example the prevention or identification of crimes) and our interests (for example maintaining professional secrecy). Should you exercise any of the above mentioned rights, it will be our duty to verify that you are entitled to exercise this right and we will provide feedback, generally, within a month.

For any claims or reports you have the right to contact controlling authorities.

## **CHANGES TO THIS PRIVACY POLICY**

The data controller reserves the right to make changes to this privacy policy at any time, giving notice to the Users on its website: [www.marsilli.com](http://www.marsilli.com)

Should changes pertain to data processing whose legal basis is consent, the Data Controller, if necessary, will request User's consent again.