

## PRIVACY POLICY AND CONFIDENTIALITY NOTE - D.Lgs. 196/03

### 1. Foreword and definitions

The present document describes how Aluphoenix Srl manages the personal data collected due its activity.

Definitions:

- **Owner of the personal data, or "Owner":** The person or organization to whom the personal data refers; Employees, Co-workers, Customers, Suppliers,
- **Data controller, or "Controller":** Aluphoenix Srl

### 2. Privacy communication

Update of the privacy policy are published into the company website [www.aluphoenix.com](http://www.aluphoenix.com). Policy update level is shown by the issuing date at the end of the document.

Who might be interested in, is invited to periodically check the company website and to download it.

Aluphoenix Srl do not collect any data through the web site.

Peculiar profiling activities by any means managed, whose data treatment diverges from the following, would foresee a suitable and peculiar privacy policy and confidentiality note.

### 3. Treatment of the personal data

Aluphoenix Srl collects personal data by any means f.i.; eMail, fax, mail, telephone, vis-à-vis, and stores them in:

1. Company Database,
2. Electronic folders in the company Server,
3. Physical folders.

All collected personal data are communicated to third parties but only having an express authorization in writing of the owner. However, Aluphoenix Srl should be in the need to communicate others' personal data to comply judiciary dispositions, legal or governmental requests, or to a third party who could have bought Aluphoenix Srl activity for whatever reason. Personal data can also be transmitted to Aluphoenix branch-, affiliates-, subsidiary-companies as well as to suppliers, but only because of the business relationship between Aluphoenix Srl and the owner of the personal data.

All collected personal data are protected from non-authorized access. Only employees, professionals and consultant of Aluphoenix who are meant to manage personal data of third parties because of the business relationship between Aluphoenix Srl and the owner of the very same data, are entitled to access to them.

Information by any means to third parties communicated are in any case strictly confidential. The addressee is solely allowed to use them for the purpose into them mentioned. Should a third party receive a communication being not the right addressee, Aluphoenix Srl has to be promptly informed and the communication has to be cancelled from any storage system. The receiver is aware that, keeping personal data of third parties, sending them to other not entitled parties, copy or use them for not allowed purposes, is a criminal behaviour according to the Italian D.Lgs 196/2003.

### 4. Variation, cancellation of personal data

Unless differently agreed by writing with their owner, Aluphoenix Srl will not vary any personal data collected.

At any time, the owner is entitled to ask to Aluphoenix Srl the variation or/and cancellation of its personal data, from any storing-system used, by writing to the hereunder address and specifying the nature of the request and providing eventual peculiar instructions which Aluphoenix Srl is requested to attend.

In case of request of cancellation, Aluphoenix Srl would keep a copy of the owner's request as proof of compliance to this privacy policy.

For any question and request concerning Aluphoenix privacy policy, please address the request to:

**"Aluphoenix Srl | Via Monte Santo 33/A | 31039 - Riese Pio X (TV) - Italia | [info@aluphoenix.com](mailto:info@aluphoenix.com)"**

Riese Pio X, 18/01/2018  
**Aluphoenix Srl**



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