

## PRIVACY POLICY

**Aluphoenix S.r.l.** firmly believes that transparency is the basis of its relationship with users (hereinafter referred to as "**Users**"). For this reason, wishes to apply the maximum clarity on how personal data of the Users are processed when browsing its website (hereinafter also only "**Site**")

### 1. Data controller

Data controller is **Aluphoenix S.r.l.** with registered office in Via Monte Santo 33/A - Riese Pio X (TV), in the person of the legal representative pro tempore.

The Data Controller can be contacted:

- via e-mail: [info@aluphoenix.com](mailto:info@aluphoenix.com)
- via mail: **Aluphoenix S.r.l.** Via Monte Santo 33/A – Riese Pio X (TV)

The Data Controller may appoint other persons responsible for processing ex art. 28 GDPR (hereinafter referred to as "**External data processors**"), as well as persons authorised to carry out processing operations (hereinafter referred as "**Authorised data processors**") according to art. 28 e 29 del GDPR. A complete and updated list of External data processors is available by contacting the Data controller at the addresses above.

### 2. Type of data processed, purpose of processing, legal basis and nature of the conferment of data

#### 2.1. Web browsing data

When browsing the Sites, the computer systems and software procedures used to operate them acquire, in the course of their normal operation, some personal data whose transmission is implied by the use of Internet communication protocols.

This data category includes the IP addresses or domain names of computers used by users, the URI/URL (Uniform Resource Identifier/Locator) addresses of requested resources, the time of the request, the 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 reply given by the server (good end, error, etc.) and other parameters related to the user's operating system and computer environment.

The web browsing data is processed for the following purposes:

- to verify the correct functioning of the Websites and the services offered.

The web browsing data could also be used for the detection of crimes by the Judicial Authority.

The **legal basis** of the processing is the legitimate interest of the Data Controller in the proper functioning of the website.

The provision of web browsing data is necessary to access and navigate the website

#### 2.2. Personal data provided by the User

The personal data the user voluntarily provides, are processed for the following purposes:

- **Management of the requests** sent using the contacts in the section with the same name. The **legal basis** of the processing is the execution of pre-contractual and contractual measures taken at the request of the data subject. The provision of data is necessary to allow the Data Controller to provide feedback on your requests;



**Aluphoenix Srl**

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- **The eventual newsletter tool** could be foreseen to contact the user by e-mail and/or for the sending (also in an automated way) of our newsletter, communications, even commercial, informative and advertising material, Invitations to workshops, events and initiatives. If the user decides not to receive our newsletter, please unsubscribe by writing to [info@aluphoenix.com](mailto:info@aluphoenix.com). The **legal basis** for processing is the consent given by the user when subscribing to the newsletter. The provision of data and consent is **always optional**. The possible withdrawal of consent does not affect the processing of data prior to the said withdrawal.

### 3. Third-party advertisers and links to other websites

The websites may include advertisements from parties other than the Data Controller (hereinafter referred to as "**Third Parties**") and links to other websites and/or applications. By accessing such websites and/or applications, the Third Parties may collect information about you when you interact with their content, advertising and services under the terms and conditions described in the respective websites/applications.

### 4. Data processing and storage times

The Data Controller has taken specific security measures to prevent data loss, illegal or incorrect use and unauthorized access.

Personal data is kept for the time strictly necessary to achieve the purposes for which it was collected. In particular:

- **For the processing of the requests of the user**, the storage time is equal to the time required to process the request;
- **for the sending of the newsletter**, personal data is stored and used as long as the user do not object to processing and do not revoke your consent.

### 5. Data communication

In order to comply with specific legal obligations or for strictly functional reasons to the execution of the relationship with the Data Controller, in relation to the above-mentioned purposes, the personal data of the User may be communicated to the following recipients: internal staff of the Controller, external consultants, banks, judicial authorities, public bodies and institutions as well as other third parties, acting as Controllers or autonomous data controllers, if this is strictly necessary to pursue the purposes mentioned above.

### 6. Transfer of data outside the European Economic Area (SEE)

The personal data of the User will not be transferred outside the European Economic Area (EEA). Where it becomes necessary to transfer data outside the European Economic Area (EEA), the Controller will update this Policy. In any case, any transfer of data will be carried out in accordance with and within the limits provided for by applicable legislation and, in particular, by art. 44 ff. GDPR.

### 7. Rights of data subject

As provided for by art. 13 of the GDPR, the User may at any time:

- a) Request the Data Controller to access personal data and correct or delete them or restrict the processing of data concerning them;
- b) Oppose the processing of personal data (see next paragraph);
- c) Exercise the right to data portability;



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- d) Revoke consent at any time without prejudice to the lawfulness of processing based on consent given before revocation;
- e) to submit a complaint to a supervisory authority (in Italy the Garante for the protection of personal data).

The rights described above in letters a), b), c) and d) can be exercised with a request addressed to the Data Controller without formalities at the following addresses:

- via e-mail: [info@aluphoenix.com](mailto:info@aluphoenix.com)
- via posta: **Aluphoenix S.r.l.** Via Monte Santo 33/A – Riese Pio X (TV)

## 8. Right of Opposition

Pursuant to art. 21 para. 1 and par 2. of the GDPR for processing based on legitimate interest, as well as for marketing and commercial activities, the User has a right to object that can be exercised by writing to [info@aluphoenix.com](mailto:info@aluphoenix.com). Writing to this address the User can no longer receive commercial communications from the Data controller and unsubscribe from the newsletter.

## 9. Amendments

The Data Controller reserves the right to modify at any time, also due to changes in the applicable legislation, the Privacy Policy by updating this page. We therefore invite the User to periodically check the Privacy Policy to be aware of relevant updates.

La presente Privacy Policy è stata emessa, ed ha decorrenza, dal 01.02.2024.



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