



# PRIVACY POLICY

## **I - INFORMATION RELATING TO THE WEBSITE'S PRIVACY POLICY**

1. This section contains the information that relates to the means of managing [www.af-systems.com.it](http://www.af-systems.com.it) with reference to the processing of the data concerning the users of [www.af-systems.com.it](http://www.af-systems.com.it).
2. This information statement is also valid for the purposes of art. 13 of (It.) Legislative Decree no. 196/2003, Personal Data Protection Code, and for the purposes of article 13 of Regulation (EU) no. 2016/679, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, for the persons who interact with [www.af-systems.com.it](http://www.af-systems.com.it), and may be found at the address that corresponds to the home page: [www.af-systems.com.it](http://www.af-systems.com.it)
3. The information statement is provided only for [www.af-systems.com.it](http://www.af-systems.com.it) and not for other websites that the user may consult through links contained in this website.
4. The purpose of this document is to provide indications with regard to the means, times and nature of the information that the data controllers must provide to users on connection to the web pages [www.af-systems.com.it](http://www.af-systems.com.it), regardless of the purposes of the connection itself, in accordance with Italian and EU legislation.
5. The information statement may be amended due to the introduction of new rules and regulations on the matter; we would, therefore, like to invite users to periodically check this page.
6. If the user is younger than 14, pursuant to art. 8, para. 1 of Regulation (EU) 2016/679, they must legitimise their consent with the authorisation of their parents or persons acting on their behalf.

## **II - DATA PROCESSING**

### **1. Data Controller**

1. The data controller is the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data. They are also responsible for security profiles.
2. In relation to this website, the data controller is AF Systems s.r.l., with registered office in Via San Siro 38 29121 Piacenza PC; for any clarification or for the exercise of their rights, users may contact the controller at the following e-mail address: [segnalazioni@af-systems.com.it](mailto:segnalazioni@af-systems.com.it).

### **2. Data Processor**

1. The data processor is the natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.
2. Pursuant to article 28 of Regulation (EU) no. 2016/679, as appointed by the Data Controller, the data processor of the website [www.af-systems.com.it](http://www.af-systems.com.it) is: AF Systems s.r.l.

### **3. Data processing location**

1. The data processing that derives from the use of [www.af-systems.com.it](http://www.af-systems.com.it) is performed at the registered office of the company in Via San Siro 38 29121 Piacenza PC.
2. If needed, the data related to the newsletter service may be processed by the data processor or subjects tasked thereby for this purpose at the related office.



## **III - COOKIES**

### **1. Type of Cookies**

1. The website [www.af-systems.com](http://www.af-systems.com) uses cookies to render the user's browsing experience easier and more intuitive: cookies are small strings of text used to store certain information that may concern the user, their preferences or the device with which they are accessing the Internet (computer, tablet or mobile phone) and are used mainly to adapt the operation of the website to the user's expectations, offering a more customised browsing experience and saving the choices made previously.
2. A cookie consists in a small set of data transferred to the user's browser by a web server and may only be read by the server that transferred them. It is not an executable code and it does not transmit viruses.
3. Cookies do not record any personal information and any identifiable data will not be saved. If the user so wishes, it is possible to prevent some or all cookies from being saved. However, in such case the use of the website and of the services offered could be compromised. To proceed without changing the options relating to cookies, it suffices to continue browsing.

Below please find the types of cookies used by the website:

### **2. Technical cookies**

1. Numerous technologies are used to save information in the user's computer, which is then collected by the websites. The best-known and most-used among them are HTML cookies. They are used for browsing and to facilitate access to and use of the website by the user. They are needed for the transmission of messages on electronic networks or to the supplier so that they may provide the service requested by the Customer.
2. The settings for managing or deactivating cookies may vary depending on the internet browser used. In any case, the user can manage or request the general deactivation or deletion of cookies, by changing the settings of their internet browser. Such deactivation may slow down or prevent access to certain parts of the website.
3. The use of technical cookies makes for safe and efficient use of the website.
4. The cookies inserted in the browser and retransmitted through Google Analytics or through blogger (or similar) statistics service are technical only if they are used to optimise the website directly by the owner of the website, who may collect aggregated information on the number of users and on how they visit the website. Under these conditions, the rules envisaged for technical cookies, in terms of information statements and consent, shall also apply to analytics cookies.
5. From the point of view of duration, we can distinguish temporary session cookies that are automatically deleted at the end of the browsing session and serve to identify the user and thus save them from logging into every page visited, and permanent cookies that remain active in the PC until their expiry or deletion by the user.
6. Session cookies may be installed to allow access and stay in the reserved area of the portal as an authenticated user.
7. They are not saved persistently but exclusively for the duration of the browsing, until the browser is shut down and disappear as soon as the browser is closed. Their use is strictly limited to the transmission of session identifiers made up of random numbers generated by the servers, needed to allow the safe and efficient exploration of the website.



## **IV - DATA PROCESSED**

### **1. Means of data processing**

1. Like all websites, this website also uses log files which store information collected automatically during the users' visits. The following information may be collected:
  - internet Protocol (IP) address;
  - browser type and parameters of the device used to connect to the website;
  - name of the Internet Service Provider (ISP);
  - date and time of the visit;
  - web page from which the visitor came (referral) and last page visited;
  - possibly, the number of clicks.
2. The aforementioned information is processed automatically and collected exclusively in aggregated form in order to check the correct operation of the website and for security reasons. This information will be processed based on the controller's legitimate interests.
3. For security purposes (anti-spam filters, firewall, virus detection), the data recorded automatically may also include personal data, such as the IP address, which may be used, in compliance with the applicable laws on the matter, to block attempts to harm the website or to cause damage to other users, or in any case to carry out damaging activities or activities that constitute an offence. These data are never used to identify or profile the user, but only for the protection of the website and its users; this information will be processed based on the controller's legitimate interests.
4. If the website allows comments, or in case of specific services requested by the user, including the possibility to send their CV for a possible employment relationship, the website automatically detects and records certain identifying data of the user, including the e-mail address. These data are deemed to have been provided by the user willingly when they requested the provision of the service. By entering a comment or other information, the user expressly accepts the privacy information statement, and, in particular, they consent to the free dissemination of the comments entered also to third parties. The data received will be used exclusively for the provision of the service requested and only for the time required for the provision of the service.
5. The information that website users will decide to make public through the services and tools made available to them is provided consciously and willingly by the user, releasing this website from any liability with regard to possible violations of the law. It shall be the user's responsibility to check that they have permission to enter the personal data of third parties or content protected by national and international rules and regulations.

### **2. Purpose of data processing**

1. The data collected by the website during its operation are used for the purposes mentioned above and for the following purposes:
  - request of data for marketing and/or advertising purposes through a newsletter.
2. The data will be retained for the time that is strictly necessary for the furtherance of the aforementioned purpose and, however, for no longer than 2 years.
3. In any case, the data collected by the website will never be provided to third parties, on any grounds, unless in the case of a legitimate request by the judicial authority and only in the cases envisaged by law.
4. The data used for security purposes (to block attempts to damage the website) shall be retained for the time that is strictly necessary for the furtherance of the aforementioned purpose.



### 3. Data provided by the user

1. As indicated above, the optional, explicit and voluntary sending of e-mail to the addresses indicated on this website shall result in the successful acquisition of the sender's address, needed to reply to the requests, and of any other personal data entered in the message.
2. Specific summary information statements will be progressively referred to or displayed on the pages of the website prepared for specific services on request.

### 4. Support in configuring your browser

1. The user may manage cookies also through the settings of their browser. However, by deleting cookies from the browser, they may remove the preferences they have set for the site.
2. For more information and support, you may also visit the specific help page of the browser you are using:
  - Internet Explorer: <http://windows.microsoft.com/en-us/windows-vista/block-or-allow-cookies>
  - Firefox: <https://support.mozilla.org/en-us/kb/enable-and-disable-cookies-website-preferences>
  - Safari: <http://www.apple.com/legal/privacy/it/>
  - Chrome: <https://support.google.com/accounts/answer/61416?hl=it>
  - Opera: <http://www.opera.com/help/tutorials/security/cookies/>

## V. RIGHTS OF THE USER

1. Art. 13, para. 2 of Regulation (EU) 2016/679 lists the user's rights.
2. The website [www.af-systems.com.it](http://www.af-systems.com.it) would, therefore, like to inform the user of the existence:
  - of the data subject's right to request from the controller access to the personal data (art. 15 of EU Regulation), their update (art. 7, para. 3, letter a) of (It.) Legislative Decree 196/2003), their rectification (art. 16 of EU Regulation), their completion (art. 7, para. 3, letter a) of (It.) Legislative Decree 196/2003) or the restriction of the processing that concerns them (art. 18 of EU Regulation) or to object, for legitimate reasons, to their processing (art. 21 of EU Regulation), as well as of the right to the portability of data (art. 20 of EU Regulation);
  - of the right to request the erasure (art. 17 of EU Regulation), the transformation into anonymous form or the block of data processed in violation of the law, including those whose retention is not necessary for the purposes for which the data were collected or subsequently processed (art. 7, para. 3, letter b) of (It.) Legislative Decree 196/2003);
  - of the right to obtain attestation that the operations of update, rectification, completion of the data, erasure, block of the data, transformation have been notified to, also with regard to their content, those to whom the data have been disclosed or disseminated, except in case the fulfilment of this obligation is found to be impossible or entails a clearly use of means that is clearly disproportionate compared to the right protected (art. 7, para. 3, letter c) of (It.) Legislative Decree 196/2003);
3. The requests may be addressed to the data controller, without formality, or, alternatively, by using the template envisaged by the Italian Data Protection Authority, or by sending an e-mail to the address: [segnalazioni@af-systems.com.it](mailto:segnalazioni@af-systems.com.it)
4. If the processing is based on art. 6, paragraph 1, letter a) - explicit consent for use - or on art. 9, paragraph 2, letter a) - explicit consent for the use of genetic, biometric data, data concerning health, data revealing religious or philosophical beliefs or membership of trade unions, data revealing racial or ethnic origin, political opinions - the user shall have the right to withdraw consent at any time without prejudice to the lawfulness of the processing based on consent granted before the withdrawal.
5. Equally, in case of violation of the regulatory framework, the user shall have the right to lodge a complaint with the Italian Data Protection Authority, as competent authority for the supervision of data processing in Italy.
6. For a more in-depth analysis of your rights, please see articles 15 et seq. of Regulation (EU) 2016/679 and art. 7 of (It.) Legislative Decree 196/2003.



## **VI - TRANSFER OF THE DATA TO COUNTRIES OUTSIDE THE EU**

1. This website may share some of the data collected with services located outside the European Union. Specifically with Google, Facebook and Microsoft (LinkedIn) through the social plugins and the service of Google Analytics. The transfer is authorised and rigorously regulated by article 45, paragraph 1 of Regulation (EU) 2016/679; consequently, no further consent is required. The aforementioned companies guarantee their membership of the Privacy Shield.
2. Data will never be transferred to third Countries that do not comply with the conditions set forth by article 45 et seq. of the EU Regulation.

## **VII. SECURITY OF THE DATA PROVIDED**

1. This website processes the users' data lawfully and fairly, by adopting suitable security measures that aim to prevent unauthorised access, unauthorised divulgation, modification or destruction of the data. The processing shall be performed with IT and/or data transmission tools, by organisational means and logics strictly related to the purposes indicated.
2. In certain cases, other than the controller, the data may be accessed by categories of persons who have been tasked with and are involved in the organisation of the website (administrative, sales, marketing personnel, legal counsel, system administrators) or external subjects (such as third-party providers of technical services, postal couriers, hosting providers, IT companies, PR firms).

## **VIII. AMENDMENTS TO THIS DOCUMENT**

1. This document, published at the address: [www.af-systems.com](http://www.af-systems.com).it constitutes this website's privacy policy.
2. It may be subject to amendments or updates. Significant amendments and updates will be pointed out with specific notifications to the users.
3. The previous versions of the document may, however, still be consulted on this page.
4. The document was updated on 26/11/2020 to comply with the regulatory provisions on the matter, and, in particular, in compliance with Regulation (EU) 2016/679.