

# **SOCIAL NETWORK USER PRIVACY POLICY**

**ALMECO S.p.A.**

**SOCIAL USER PRIVACY POLICY**  
pursuant to Articles 13 and 14, Recitals 60-62, Regulation (EU) 2016/679 - “GDPR”

## 1. DATA CONTROLLER

### **ALMECO S.P.A.**

Address: Via della Liberazione 15 – 20098, San Giuliano Milanese (MI)

Telephone: +39 02 9889631

Fax: +39 02 98896399

Email: [info.it@almecogroup.com](mailto:info.it@almecogroup.com); [privacy@almecogroup.com](mailto:privacy@almecogroup.com)

Certified email: [almeco@registerpec.it](mailto:almeco@registerpec.it)

VAT no. and tax code and ITVAT: 00772590154

Share capital: €30,000,000 fully-paid

Economic and Administrative Index (REA): 687991

Milan Chamber of Commerce

[www.almecogroup.com](http://www.almecogroup.com)

## 2. DATA PROTECTION OFFICER (DPO)

### **MICROELL Srl (contact Francesco Traficante)**

Via Mazzini 19b, 21052 Busto Arsizio (VA)

Email: [dpo@almecogroup.com](mailto:dpo@almecogroup.com)

## 3. SOCIAL PROFILE MISSION

In order to better promote our products/services, we also make use of different social networks in order to provide detailed and specific information about our products/services.

Our Posts may enter your timeline or gallery as our Follower or for liking or visiting our fanpage. We also use social networks to carry out advertising campaigns that will allow our Promotional Posts to be displayed on the basis of certain segmentation parameters of the audience we are interested in (e.g. age group, profession, geographic area, etc.), information in the social network's possession or information already in our possession, e.g. email addresses or mobile phone numbers, data previously provided and collected by us or the Follower or Like categories.

Through our fanpage, our Posts or Advertising Campaigns you can land on our web pages, other social profiles/fanpages and interact directly with us, either by contacting us directly or via the available chat or email service or the form provided.

By Following or Liking us, you will always be able to:

- be updated on our services and products and any news;
- request information and quotes and/or quotations.

## 4. PRINCIPLES

One of our fundamental objectives is the protection of personal data. The data are processed in a lawful, proper and transparent manner, must be adequate, relevant and limited to what is necessary, accurate and, if necessary, updated, collected for specific, explicit and legitimate purposes pursuant to articles 5 and 6 of Regulation (EU) 2016/679 on Data Protection and based on the provision of consent where needed. The data are processed in such a way as to ensure their adequate security, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage (integrity and confidentiality) through appropriate technical and organisational measures. We notify users in the event of substantial changes to this Privacy Policy and the related data processing, providing the option to authorise us or otherwise to process the data for the purposes set out below.

## 5. SOURCES OF PERSONAL DATA

### **Collected from the Data Subject:**

- Data Controller's Social Profiles and/or Web Pages.

### **NOT collected from the Data Subject:**

- Internet / Search Engines/ Social Networks
- Web Pages and/or Social Profiles of the Suppliers-Lead Providers.

## 6. CATEGORIES OF DATA SUBJECTS

**Users:** natural and legal persons and other operators in the sector, including workers and similar persons of Customer Companies and potential Customers or Supplier Companies and potential Suppliers, following consultation of our fanpage, Following, Liking, comments or reviews, requests for information, as can be deduced from the context and mode of operation of the social network itself, or because they correspond to specific and targeted criteria such as demographic data, interests, preferences and connections (in the case of targeted advertisements), or as a result of providing data and marketing consent (in the case of personalised advertisements).

## 7. CATEGORIES OF PERSONAL DATA

### COMMON:

**Identification, contact and other data:** Name and Surname and any further public data in one's social profile, within the limits of the privacy settings configured by the user directly on the social network, e.g. Telephone, Email, Country, Company Name, Profession, Education, etc.;

Any other data may be provided if necessary via available chat or email services or a form.

## 8. PURPOSES OF THE PROCESSING

DESCRIPTION OF THE PURPOSE OF THE PROCESSING	LEGAL BASIS AND NATURE OF THE PROVISION OF THE DATA	DURATION AND DATA RETENTION
<p><b>EXECUTION OF PRE-CONTRACTUAL MEASURES</b></p> <p>Purposes connected to the establishment and the execution of pre-contractual measures, specifically:</p> <ul style="list-style-type: none"> <li>Information and advice, sending of catalogues, white papers, registration for events, etc. at the request of the user.</li> </ul>	<ul style="list-style-type: none"> <li>Execution of pre-contractual measures.</li> <li>The provision of data is optional but necessary for the purpose of processing the request of the Data Subject.</li> </ul>	<ul style="list-style-type: none"> <li>For a period strictly necessary for the proper and complete management of the request and erasure after 12 months.</li> </ul>
<p><b>MARKETING:</b></p> <ul style="list-style-type: none"> <li>advertising campaigns relating to initiatives, events, information, new products, new offers;</li> <li>target advertisements following audience segmentation (e.g. by age group, profession, company function, sector, geographical area, interests, etc.), in which case prior consent must be given to the social network;</li> <li>personalised advertisements or by means of information in our possession, e.g. email address, mobile phone, etc. and with specific consent or as a result of Following, Liking, etc. (as per the modus operandi of the social network itself) and in that case prior consent was given to the social network;</li> <li>survey of the degree of satisfaction of its users, in order to assess and monitor the quality of the services/products offered, verify the expectations and needs of users for an improvement in the quality of the services provided, carried out directly by the Data Controller or by specialised third-party companies by means of, for example, personal or telephone interviews, interactive questionnaires, market surveys, etc.</li> </ul>	<ul style="list-style-type: none"> <li>Consent is optional and may be withdrawn at any time.</li> <li>The provision of data is optional.</li> </ul>	<ul style="list-style-type: none"> <li>Duration and Retention up to 24 months from the expression of the Consent.</li> <li>Near the expiration of these terms, new request for consent, otherwise halting of processing and/or deletion and only statistics in aggregate mode.</li> </ul>
<p><b>STATISTICS:</b></p> <ul style="list-style-type: none"> <li>analysis of Fanpage traffic, interactions, shares, comments received, etc. based on the options and metrics in each social network.</li> </ul>	<ul style="list-style-type: none"> <li>Legitimate interest of the Data Controller</li> </ul>	<ul style="list-style-type: none"> <li>Since the data received by the Data Controller are anonymous and aggregated, there is no limit to storage.</li> </ul>

<p><b>LEGAL OBLIGATIONS:</b></p> <ul style="list-style-type: none"> <li>• Fulfilment of precise obligations envisaged by regulations and applicable European and national laws.</li> </ul>	<ul style="list-style-type: none"> <li>• Compliance with legal obligations.</li> <li>• The provision of data is necessary in order to fulfil the legal obligations the Data Controller is subject to.</li> </ul>	<ul style="list-style-type: none"> <li>• Duration and Storage dictated by legal provisions.</li> </ul>
<p><b>DEFENSIVE RIGHTS:</b></p> <ul style="list-style-type: none"> <li>• Assessment, exercise or defence of the rights of the Data Controller in and out of court.</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interest.</li> <li>• The provision of data is necessary for the exercise of purely defensive rights.</li> </ul>	<ul style="list-style-type: none"> <li>• Duration of litigation in and/or out of court.</li> <li>• Storage until the claims are time-barred.</li> </ul>
<p>For the processing of personal data and the purposes pursued, duration and storage, under the direct responsibility of the Social Network, see the respective <a href="#">general terms and conditions of use</a> and <a href="#">privacy policy</a>.</p>		

## 9. CONTACT METHODS FOR MARKETING PURPOSES

### Traditional:

- Telephone call to landline or cell phone with operator and/or traditional Post (Italy: after verification of the Register of Objections / Outside of Italy: after verification of the legislation in force in the country where the Data Subject is based).

### Automated:

- Automated telephone call to landline or cell phone (Italy: after verification of the Register of Objections / Outside of Italy: after verification of the legislation in force in the country where the Data Subject is based);
- Fax;
- Text message;
- Multimedia message
- Email;
- Chat or messaging systems (WhatsApp and other comparable instant messaging solutions)
- Targeted advertising;
- Personalised advertising.

## 10. RECIPIENTS OF THE DATA

The data are processed by Social Media Providers and their partners as joint Data Controllers for the pursuit of their own purposes as set out in their respective [general terms and conditions of use](#), [joint data controller agreement](#) and [privacy policies](#).

The data may be disclosed and processed by external parties acting as Autonomous Data Controllers such as, by way of example:

### Italy:

- Authorities and supervisory and control authorities;
- Police and judicial authorities;
- Parties who are transferees of a company, of a business unit, of legal relationships that can be identified as a whole or of individual legal relationships (e.g. the transfer of receivables, contracts);
- Parties that offer professional consulting services, including in associated form.

If the requests from the User concern geographical areas of competence of other Almecco Group companies:

### European Union (Germany):

- Companies – foreign or otherwise – that are associates or belong to the same group or parent company, ALMECCO GROUP (Italy).

### USA:

- Companies – foreign or otherwise – that are associates or belong to the same group or parent company.

### China:

- Companies – foreign or otherwise – that are associates or belong to the same group or parent company.

The data may also be processed in the name and on behalf of the Data Controller by external parties designated as Data Processors or Sub-Processors, to which appropriate operating instructions are given. These parties are essentially included in the following categories:

**Italy:**

- Parties that carry out control, review and certification activities, including in the interest of customers;
- Parties that offer ongoing compliance support services;
- Parties that offer IT, ICT, cloud, web and digital marketing services;
- Parties that offer paper, digital and alternative storage services;
- Parties that offer traditional and automated postal services;
- Parties that offer support in preparing market studies;
- Parties that offer ICT services (Hosting/Data Centre);
- Companies or consultants offering other sundry services.

**European Union:**

- Parties that offer IT, ICT, cloud, web and digital marketing services.

## **11. PARTIES AUTHORISED TO PROCESS THE DATA**

The data may be processed by employees and contractors of company functions – including the sales network – assigned to pursue the aims indicated above, who have been specifically authorised to process data and adequately sensitised and trained and have received adequate operating instructions.

## **12. TRANSFER OF THE PERSONAL DATA TO NON-EU COUNTRIES**

The data of the Data Subjects, Legal Persons – including the data of the workers of the Customer Companies and potential customers – located in countries outside Europe may be transferred to the USA, China and to Agents or other commercial entities located in countries outside the EU that are authorised to sell, promote and distribute the products based on their territorial coverage corresponding to the same area as the customer or potential customer.

For this reason, pursuant to art. 3, paragraph 2 of the GDPR the Regulation does not apply. Therefore, the regulations on the protection of personal data in force in the States in which the Recipients are based shall be applied.

Furthermore, data may be transferred to countries outside the EU by the Data Controllers of social platforms and/or search engines and their Partners. For more information: [general terms and conditions of use](#), [joint data controller agreement](#) and [privacy policy](#).

A copy of the data can be obtained in the manner outlined in the section "[Rights of the Data Subject – Lodging complaints with the Supervisory Authority](#)" below.

## **13. RIGHTS OF THE DATA SUBJECT – LODGING COMPLAINTS WITH THE SUPERVISORY AUTHORITY**

We and social media Providers process personal data as Joint Data Controllers. This Privacy Policy discloses and governs the processing carried out under our direct responsibility. To understand how the Social Network operates and processes under its own responsibility, including how to exercise one's rights: [general terms and conditions of use](#), [joint data controller agreement](#) and [privacy policy](#).

By contacting the Data Controller by email at [privacy@almecogroup.com](mailto:privacy@almecogroup.com), Data Subjects may ask the Data Controller to give them access to their data, block their data, correct inaccurate data, complete incomplete data, restrict processing in the cases envisaged by article 18 of the GDPR, as well as object to processing in the case of the legitimate interest of the Data Controller.

The data controller shall provide the data subject with the information relating to the request for the exercise of the data subject's rights (pursuant to articles 15 to 22 of the GDPR) without undue delay, and in any event at the latest within one month of receiving the request, as envisaged in article 12 of the GDPR.

Furthermore, in the event that the processing is based on consent or a contract and is performed with automated tools, the data subjects have the right to receive the data in a structured, commonly used and machine-readable format, and, if technically feasible, to have them sent to another data controller without impediment (Right to Portability), and to request the simultaneous or subsequent definitive cancellation of such data (Right to Be Forgotten).

Data Subjects have the right to withdraw the consent given at any time for marketing purposes, objecting to such processing, using the link in each email or by sending an email to the above address, including in the subject, for example, “delete me - email” or “delete me - telephone” or “delete me - specify other method of contact in use”.

If no advertising communications are desired at all, include in the subject “delete me - marketing”.

In the case of promotional advertisements (Targeted or Customised Advertising) on websites and/or search engines and/or social networks, if a promotional advertisement is seen the platform in use could allow one to know why they are part of a target or customised audience, and how they can leave that audience: objection at any time, even revocable by removing Follow or Like or “Hide Advertisement or Advertiser” in the “Why you’re seeing this advertisement” section, which can be selected directly from the Promotional Post.

If the processing is based on consent for one or more purposes (art. 6, paragraph 1, letter A of the GDPR) and for the processing of particular data (art. 9, paragraph 2, letter A of the GDPR), the withdrawal of consent at any time does not affect the legality of the processing based on consent before such withdrawal.

Data subjects shall have the right to lodge a complaint with the Supervisory Authority having jurisdiction in the Member State of their habitual residence, place of work or place of the alleged infringement.