

PRIVACY POLICY ON PERSONAL DATA PROCESSING under the European Regulation no. 679/2016 ("GDPR")

In compliance with the European Regulation 2016/679 with regard to personal data protection, processing and free circulation (GDPR), VERDERIO S.R.L. (tax no. / VAT no. 01818000158), registered office in Trezzano Rosa (MI), Via G. Di Vittorio n. 3, in the person of its legal representative Mr. Mauro Verderio, hereby informs you that personal data ("Data") provided through your access to the website www.verderio.eu (hereafter the "Website") and also required to execute possible contracts with the Company, will be processed in compliance with the privacy policy, in full observance of the principles of correctness, lawfulness, transparency, confidentiality and related rights. Therefore, we wish to submit the following information.

Processed data nature, personal data processing purpose and method

Verderio s.r.l. collects some personal data of users such as name, surname, e-mail address, phone number, user ID and password, aggregate information during Website navigation, any other personal data voluntarily provided by Users when registering on our Website, or at the time of request for goods and services offered by the Website or at the time the inquiry is sent to the Website by e-mail. The Website is accessible to Users without disclosure of personal data. However, some sections of the Website are exclusively accessible to registered users. Hence, personal data of Users will be processed by automated means during navigation, when registering on the Website, at the time of request for goods and services or at the time of inquiring. Furthermore, when a User visits the Website to ask for information, Verderio s.r.l. will collect his personal data to answer him. Verderio s.r.l. shall process personal data of users for the following purposes:

- 1) needs related to operations for authorization and customization of access to the various sections and related contents of the Website 2)
- 2) performance of a service or of an operation required by the User as part of the Company activity
- 3) sending of newsletters and regular updates (for instance e-mails) concerning products and services
- 4) initiatives and events organised by or in cooperation with Verderio s.r.l., including invitations to said events, both by use of traditional means of communication (for instance mail, operator's phone calls, etc.), and by use of automated electronic means pursuant to art. 130, paragraph 1 and 2 of Legislative Decree 196/03 and, possibly pursuant to Community and/or national provisions replacing/integrating the above-mentioned legislation
- 5) direct marketing activity aiming at promoting Verderio s.r.l. services, products and trademarks, both by use of traditional means of communication (for instance mail, operator's phone calls, etc.), and by use of automated electronic means pursuant to art. 130, paragraph 1 and 2 of Legislative Decree 196/03 and, possibly pursuant to Community and/or national provisions replacing/integrating the above-mentioned legislation
- 6) analysis activities and market surveys, both by use of traditional means of communication (for instance mail, operator's phone calls, etc.), and by use of automated electronic means pursuant to art. 130, paragraph 1 and 2 of Legislative Decree 196/03 and, possibly pursuant to Community and/or national provisions replacing/integrating the above-mentioned legislation

Navigation data

IT systems and software procedures, used to operate the Site, during their normal operation acquire some personal data whose transmission is implied in the use of the Internet communication protocols.

This information is not collected to be associated with identified data subject, but it may, by its very nature, allow identifying users through processing or association with data held by third parties.

This category of data includes IP addresses or domain names of computers used by Users connecting to the website, URI (Uniform Resource Identifier) addresses of requested resources, the time of the query, the method used to send the query to the server, the size of the file received in reply, the numerical code

indicating the status of the reply provided by the server (successful, error, etc) and other parameters about the operating system and the information environment of Users.

Data voluntarily provided by the User

Verderio s.r.l. also collects personal data of Users entered in the request form for information, quotations, goods or services, and sent to Verderio s.r.l. by e-mail.

Personal data automatically placed on the Users' computer (Cookie)

Cookies are small files, usually text strings and numbers, containing information and entered in the Users' browser when a website is visited. During navigation Users may even receive cookies from different websites on their computer (known as cookies of "third parties"), directly set by said website operators and used for the purposes and according to the methods they defined. For more information about the type and the use of the cookies on this website, refer to the cookie policy.

Legal grounds for processing

The Data Controller processes the User's Personal Data in the following cases:

- 1) the User has given his consent for one or more specific purposes; Note: in some jurisdictions the Data Controller may be authorised to process Personal Data without prior consent by the User or regardless of the legal bases specified hereafter, unless the User objects to Personal Data processing. However, this cannot apply when Personal Data processing is governed by European regulations concerning Personal Data protection.
- 2) Personal Data processing is required to execute a contract with the User and/or implement pre-contractual measures
- 3) Personal Data processing is required to comply with a legal obligation to which the Controller is subject
- 4) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller
- 5) processing is necessary for the purposes of the legitimate interest pursued by the Controller or by third parties

It is however always possible to request the Controller to clarify the concrete legal basis of each processing and specifically to clarify if the treatment is required by law, by a contract or necessary to conclude a contract.

Data retention period

Data are processed and retained for the period of time necessary in respect of the purposes of their collection. Therefore:

Personal Data collected for the purposes of a contract execution between the Controller and the User shall be retained until the contract is fully executed.

Personal Data collected for the purposes of the legitimate interest pursued by the Controller shall be retained until said interest is satisfied. The User can obtain further information in respect of the legitimate interest pursued by the User by contacting him.

When processing is based on the User's consent, the Controller can retain Personal Data for a longer period, until said consent is revoked. Furthermore, the Controller may be obliged by law or by order of a competent authority to retain Personal Data for a longer period.

Personal Data necessary to carry out direct marketing activities shall be valid until cancellation by the User through direct link contained in each e-mail. When communications are made less frequently, at least every twelve months a verification communication, containing a cancellation link, is sent to all Users.

At the end of the retention period Personal Data shall be erased. Therefore, after the expiry of said period, the right to access, cancellation, amendment and Data portability can no longer be exercised.

Data Controller

The subject defining purposes and methods of Data processing, i.e. the Data Controller, is VERDERIO S.R.L. (tax number / VAT no. 01818000158), registered office in Trezzano Rosa (MI), Via G. Di Vittorio n. 3, ph. +39.02.90960079, fax +39.02.90968311.

All Verderio s.r.l. employees, who have or will have access to Users' Personal Data, act/will act under the direct authority of the Data Controller, are/will be appointed subjects authorised to Personal Data processing and have/will have received specific operating instructions. Users can address any communication or request to the Data Controller or to the Data Protection Officer by using the above-mentioned postal address, fax number or certified e-mail address.

Recipients of Personal Data

Personal Data can be communicated and processed by:

- i. legal or natural persons acting as external Data Controllers, carrying out outsourcing activities, appointed by Verderio s.r.l. or by Verderio s.r.l. external Data Controllers (among them subjects carrying out assistance, communication, marketing, advertising, promoting and goods/services sales activities as well as advertisers, advertising agencies, IT service providers, Website/APP managers, electronic platform managers, partners, credit institutions, professional agencies)
- ii. employees and /or co-operators of the Data Controller who, working under his direct authority, shall be authorised to process your Personal Data
- iii. employees and/or co-operators of external Data Controllers (including system administrators) who, working under their direct responsibility, shall be authorised to process your Personal Data. Your Personal Data shall neither be disclosed nor disseminated to third parties except when Verderio s.r.l. shall communicate them to consultants in order to preserve his rights

Transfer of Data abroad

In the context of the relationship management with Verderio s.r.l., Personal Data may be transferred to non-EU countries and/or International Organizations.

In such cases Verderio s.r.l. shall take all measures in terms of safety, protection and confidentiality for the protection of Personal Data in compliance with current legislation on privacy.

Users' rights in regard of Personal Data

The Privacy Policy recognises number of rights to data subjects, specifically:

- 1) obtain from the Data Controller the confirmation of the existence or otherwise of their Personal Data, even if not yet registered, and their communication in an intelligible form as well as access to their Personal Data (obtaining a copy) and to related information (including Personal Data processing purposes, Personal Data categories and origin, the recipients or categories of recipients to whom Personal Data might be disclosed, Personal Data retention period (if possible), exercisable rights)
- 2) obtain from the Data Controller the rectification of their Personal Data and the integration of their incomplete Personal Data
- 3) obtain from the Data Controller the deletion of their Personal Data without undue delay, specifically when their Personal Data are no longer necessary in regard of the purposes for which they were processed or when there is no legal basis for their processing
- 4) obtain from the Data Controller their transformation into anonymous form or blocking of Personal Data processed in violation of the law, including Personal Data whose retention is not necessary in regard of the purposes for which they were collected or subsequently processed
- 5) obtain from the Data Controller the restriction to their Personal Data processing, specifically when they contest the accuracy or they refused Personal Data processing for the period needed for related inspections
- 6) obtain their Personal Data in a structured, commonly-used, electronically-readable format as well as transmit or, if technically feasible, obtain the direct transmission of their Personal Data to another Data

Controller without hindrance, when processing is carried out by automated means and is based on their consent or is necessary to execute a contract they are part of

7) revoke their consent to Personal Data processing for anyone of the purposes for which it was given

You can exercise your rights in regard of Verderio s.r.l. via the Website section "Contact us" or via our e-mail address info@verderio.eu or by registered letter with acknowledgement of receipt to: VERDERIO S.R.L. (tax number / VAT number 01818000158), registered office in Trezzano Rosa (MI), Via G. Di Vittorio n. 3. Furthermore, if you believe that your Personal Data are processed in violation of the Privacy Policy, you can lodge a complaint with the Personal Data Protection Authority of the country where you reside, where you work or where the alleged violation occurred, or you can refer to the same Authority for further information in respect of the exercise of your rights as set forth by the Privacy Policy.

Third party sites

This Privacy Policy applies to Users' Personal Data collected through the Website; the same Privacy Policy does not apply to other websites owned by third parties and possibly accessible via a link present on the Website. Verderio s.r.l. shall not be held responsible for the contents of such sites and the rules they apply, even with regard to Users' privacy and processing of their Personal Data during their navigation. Therefore, Users are requested to pay particular attention when visiting such sites through the links present on our Website and to carefully read their conditions of use and their privacy policy.

VERDERIO S.R.L.