

WEB SITE INFORMATION POLICY

pursuant to Art. 13 of EU Regulation No. 2016/679

Dear User,

ALU-PRO S.r.l. protects the confidentiality of personal data and guarantees them the necessary protection from any event that could put them at risk of violation.

As required by EU Regulation No. 679/2016 ("GDPR") and, in particular, by Art. 13, here below it is provided the User ("Data Subject") the information required by law concerning the processing of his/her personal data.

We provide this Information Policy not only to fulfill the legal obligations regarding the protection of personal data provided by the EU Regulation No. 2016/679 or "Regulation", but also because we believe that the protection of personal data is an essential value of our business and we want to provide you with any information that can help you protecting your privacy and control the use that is made of your data in relation to your browsing experience on our site.

SECTION I

Who we are and what data we process (Article 13, paragraph 1, subpara. a, Article 15, subpara. B of the GDPR)

ALU-PRO S.r.l., represented by its Legal Representative, based in NOALE, Via Einstein 8, acts as Data Controller, can be contacted at alupro@alupro.it and collects and/or receives information regarding the Data Subject for running the web service. The processed data are so-called "common" data and concern personal data such as name, surname, address, nationality, province and municipality of residence, landline and/or mobile number, fax number, tax code, email(s).

ALU-PRO S.r.l. does not require the Data Subject to provide the so-called "special" data, or, according to the provisions of the GDPR (Art. 9), personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, as well as genetic data, biometrics data intended to uniquely identify an individual, data relating to health or sex life or sexual orientation of the person. In the event that the service requested from **ALU-PRO S.r.l.** requires the processing of such data, the Data Subject will receive a specific notice in advance and will be required to provide the appropriate consent.

SECTION II

For what purposes we need the data of the Data Subject (Art. 13, 1st paragraph of the GDPR)

The data are used by the Data Controller to process the registration of the personal data and the contract for the supply of the chosen Service and/or the Product purchased, to manage and execute the requests for contact forwarded by the Data Subject, to provide assistance, to comply with legal and regulatory obligations that the Data Controller is required to perform based on the activity carried out. In no case **ALU-PRO S.r.l.** resells the personal data of the Data Subject to third parties or uses them for purposes not declared.

In particular, the data of the Data Subject will be processed for:

a) the registration of the personal data and the requests for contact and/or information material

The processing of the personal data of the Data Subject takes place in order to carry out the activities that are preliminary and consequent to the request for personal data registration, to the management of requests for information and contact and/or to the sending of information material, as well as for the fulfillment of any other arising obligation.

The legal basis of this processing is the performance of the services inherent to the application for the registration of information and contact data and/or sending of information material and compliance with legal obligations.

b) the management of the contractual relationship

The processing of personal data of the Data Subject takes place in order to carry out the activities that are preliminary and consequent to the purchase of a Service and/or a Product, the management of the relevant purchase order, the supply of the Service and/or the manufacture and/or the shipment of the purchased Product, the relevant invoicing and the management of the payment, the handling of the complaints and/or the reports to the assistance service and the delivery of the assistance to the customer through the active services (i.e. Web recalls, emails, telephone, remotely), fraud prevention, as well as the fulfillment of any other obligation deriving from the contract.

The legal basis of this processing is the performance of the services relating to the contractual relationship and the compliance with legal obligations.

c) promotional/communications activities in general on Services/Products similar to those purchased by the Data Subject (Recital 47 of the GDPR)

The Data Controller, even without your explicit consent, may use the contact details disclosed by the Data Subject, for the purpose of direct sales of own Services/Products, limited to the case in which they are Services/Products similar to those covered by the sale and contractual relationship (unless the Data Subject explicitly opposes) or for the purpose of sending communications via email for the provision of the service and management of any inefficiencies and/or sending of service notices and/or related updates.

d) commercial promotion activities on Services/Products other than those purchased by the Data Subject

As regards the purposes of sending promotional messages and/or for profiling purposes, the data are processed only if the Data Subject has given his/her specific consent.

The personal data of the Data Subject may also be processed for commercial promotion purposes, for surveys and market research with regards to Services/Products that the Data Controller offers only if the Data Subject has authorized the processing and does not object to this.

This processing can be done in an automated way, with the following methods:

- emails;
- SMSs;
- telephone contacts

and can be done:

1. if the Data Subject has not withdrawn his/her consent for the use of the data;
2. if, in the event that the processing is carried out through contact with a telephone operator, the Data Subject is not registered in the register of oppositions referred to in Presidential Decree No. 178/2010;

The legal basis of this processing is the consent given by the Data Subject prior to the processing, which can be revoked freely by the Data Subject at any time (see Section III).

e) the protection of minors

The Services/Products offered by the Data Controller are reserved to subjects legally able, on the basis of the national legislation of reference, to conclude contractual obligations. The Data Controller, in order to prevent illegitimate access to its services, implements preventive measures to protect its legitimate interest, such as checking the tax code and/or other checks, when necessary for specific Services/Products, the correctness of the identification data of the ID cards issued by the competent authorities.

Communication to third parties and categories of recipients (Art. 13, 1st paragraph of the GDPR)

The communication of the personal data of the Data Subject takes place mainly towards third parties and/or recipients whose

activity is necessary for the performance of the activities pertaining to the relationship established and to fulfill certain legal obligations, such as:

CATEGORIES OF RECIPIENTS	AIMS
Third-party suppliers	Provision of services (assistance, maintenance, delivery/shipment of products, provision of additional services, providers of networks and electronic communication services) connected to the requested service
Credit and digital payment institutions, banking/postal institutions	Management of receipts, payments, reimbursements related to the contractual service
External professionals/consultants and consulting companies	Fulfillment of legal obligations, exercise of rights, protection of contractual rights, recovery of credit
Financial administration, public bodies, judicial authorities, supervisory and control authorities	Fulfillment of legal obligations, defense of rights; lists and registers kept by public Authorities or similar bodies based on specific standards, in relation to the contractual service
Subjects formally delegated or with a recognized legal title	Legal representatives, curators, guardians, etc.

The Data Controller requires third-party suppliers and Data Processors to comply with security measures equal to those implemented in relation to the Data Subject by restricting the scope of action of the Data Processor to processing related to the requested service.

The Data Controller does not transfer your personal data to countries where the GDPR is not applied (countries outside the EU) unless specifically indicated otherwise for which you will be informed in advance and your consent will be requested if necessary.

The legal basis of this processing is the performance of the services inherent in the relationship established, compliance with legal obligations and the legitimate interest of **ALU-PRO S.r.l.** to carry out processing necessary for these purposes.

SECTION III

What happens if the Data Subject does not provide his/her data identified as necessary for the execution of the requested service (Art. 13, 2nd paragraph, subpara. e of the GDPR)

The collection and processing of personal data are necessary to process the requested services as well as to provide the Service and/or supply the requested Product. If the Data Subject does not supply the personal data expressly provided for as necessary within the order form or the registration form, the Data Controller will not be able to take care of the processing related to the management of the requested services and/or the contract and the Services/Products connected to it, nor to the obligations that depend on them.

What happens if the Data Subject does not consent to the processing of his/her personal data for commercial promotion activities on Services/Products other than those purchased

In the event that the Data Subject does not give his/her consent to the processing of his/her personal data for these purposes, said processing will not take place for the same purposes, without this having effects on the provision of the services requested, nor for those for which he/she has already given his/her consent, if requested.

In the event that the Data Subject has consented and should subsequently revoke it or oppose the processing for commercial promotion activities, his/her data will no longer be processed for such activities, without this involving consequences or

effects detrimental to the Data Subject and to the services required.

How we process the data of the Data Subject (art. 32 of the GDPR)

The Data Controller provides for the use of adequate security measures in order to preserve the confidentiality, integrity and availability of personal data of the Data Subject and imposes similar security measures on third party suppliers and Data Processors.

Where we process the data of the Data Subject

The personal data of the Data Subject are stored in paper, computerized and telematic archives located in countries where the GDPR (EU countries) is applied.

How long are the data of the Data Subject kept (Art. 13, 2nd paragraph, subpara. a of the GDPR)

Unless he/she explicitly expresses his/her will to remove them, the personal data of the Data Subject will be kept until they are necessary with respect to the legitimate purposes for which they were collected.

In particular, they will be kept for the entire duration of your personal data registration and in any case no later than a maximum period of 12 (twelve) months of your inactivity, or if, within that period, the Services and/or Products purchased through the personal data.

In addition, personal data will in any case be kept for the fulfillment of (i.e. tax and accounting) obligations that remain even after the termination of the contract (Article 2220 of the Italian Civil Code); for these purposes, the Data Controller will only keep the data necessary for the related fulfillment.

The cases in which the rights deriving from the contract and / or the personal data registration are asserted, in which case the personal data of the Data Subject, exclusively those necessary for such purposes, will be processed for the time necessary to their fulfillment.

What are the rights of the Data Subject (Articles 15 - 20 of the GDPR)

The Data Subject has the right to obtain from the Data Controller the following:

a) confirmation that personal data concerning him/hers are being processed and, in this case, to obtain access to personal data and the following information:

1. the purposes of the processing;
2. the categories of personal data in question;
3. the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular, if they are recipients of third countries or international organizations;
4. when possible, the period of storage of personal data provided or, if this is not possible, the criteria used to determine this period;
5. the existence of the Data Subject's right to request the Data Controller to rectify or cancel his/her personal data or limit the processing of his/her personal data concerning him/hers or to oppose their processing;
6. the right to lodge a complaint with a supervisory authority;
7. if the data are not collected from the Data Subject of all available information on their origin;
8. the existence of an automated decision-making process, including profiling and, at least in such cases, significant information on the logics used, as well as the expected importance and consequences of this processing for the Data Subject.
9. the appropriate guarantees provided by the third country (outside the EU) or an international organization to protect any data transferred

b) the right to obtain a copy of the personal data subject to processing, provided that this right does not infringe the rights

and freedoms of third parties; in the event of further copies requested by the Data Subject, the Data Controller may charge a reasonable fee based on administrative costs

c) the right to obtain from the Data Controller the rectification of inaccurate personal data concerning him/her without unjustified delay

d) the right to obtain from the Data Controller the cancellation of personal data concerning him/her without unjustified delay, if the reasons provided by the GDPR in Art. 17, among which, for example, in the event that they are no longer necessary for the purposes of the processing or if this is assumed to be illegal, and always if there are the conditions established by law; and in any case if the processing is not justified by another equally legitimate reason;

e) the right to obtain the processing limitation from the Data Controller, in the cases provided for by Art. 18 of the GDPR, for example, where you have disputed the accuracy, for the period necessary for the Data Controller to verify their accuracy. The Data Subject must be informed, in due time, even when the suspension period has been completed or the reason for the limitation of the processing has ceased, and therefore the limitation has been revoked;

f) the right to obtain communication from the data controller of the recipients to whom requests for corrections or cancellations or limitations of processing have been sent, unless this proves impossible or involves a disproportionate effort.

g) the right to receive in a structured format, commonly used and readable by an automatic device, the personal data concerning him/her and the right to send such data to another data controller without hindrance by the Data Controller to whom he/she supplied them in the cases provided for by Art. 20 of the GDPR, and the right to obtain direct sending of personal data from one data controller to another, if technically feasible.

For any further information and in any case to send the request, the Data Subject must contact the Data Controller at the address alupro@alupro.it or the Data Processor at dpo@alupro.it. In order to guarantee that the above-mentioned rights are exercised by the Data Subject and not by unauthorized third parties, the Data Controller may request him/her to provide any additional information necessary for the purpose.

How and when the Data Subject may object to the processing of his/her personal data (Art. 21 of the GDPR)

For reasons related to the particular situation of the Data Subject, he/she may object at any time to the processing of his/her personal data if such request is based on legitimate interest or if the above occurs for commercial promotion activities, sending the request to the Data Controller at the address alupro@alupro.it.

The Data Subject has the right to the cancellation of his/her personal data if there is no legitimate prevailing reason of the Data Controller with respect to that which gave rise to the request, and in any case in the event that the Data Subject has opposed the processing for commercial promotion activities.

To whom can the complainant be propose (Art. 15 of the GDPR)

Without prejudice to any other administrative or judicial action, the Data Subject may submit a complaint to the competent control authority in the Italian territory (Guarantor Authority for the protection of personal data) or to the one that carries out its tasks and exercises its powers in the Member State where the violation of the GDPR occurred.

SECTION IV

COOKIES

General information, deactivation and management of cookies

Cookies are data that are sent by the website and stored by the Internet browser on the User's computer or other device (for example, tablet or mobile phone). Technical and third-party cookies may be installed from our website or related subdomains.