

## **PRIVACY POLICY**

Pursuant to current legislation and the provisions of art. 13 of EU Regulation 2016/679 of the European Parliament and of the Council, dated 27 April 2016, concerning the protection people with regard to the processing of personal data, as well as the free circulation of such data, we inform you that the Data Controller supplied by you is Autel Srl - Via D. Bagnoli 9, 41049 Sassuolo (MO) Italy, in the figure of his acting lawyer.

The company may modify or simply update, in whole or in part, this Privacy Policy. Any change or update to the privacy Policy will be available to all users in the privacy section of the site as soon as the updates are active and will be binding as soon as published on the site in this section. If you do not wish to accept these changes, you may discontinue using our site. The continued use of our website and of our products and services following the publication of these modifications and/or updates will be equivalent to changes acceptance and to the recognition of the binding nature of the new terms and conditions

## **COLLECTION AND PROCESSING OF PERSONAL DATA.**

### **NAVIGATION DATA**

The computer systems and software procedures used to operate this website acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols. This is information that is not collected to be associated with identified individuals, but which, by their very nature, could, through processing and association with data held by third parties, allow users to be identified.

This category of data includes IP addresses or domain names of the computers used by users who connect to the site, the addresses in the Uniform Resource Identifier (URI) notation of the 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 response given by the server (success, error, etc.) and other parameters related to the user operating system

These are used for the sole purpose of obtaining anonymous statistical information on the use of the site and to check its correct functioning, and they are deleted immediately after processing.

The data could be used to ascertain responsibility in case of hypothetical computer crimes against the site

### **DATA SUPPLIED VOLUNTARILY BY USER**

For the consultation of the site it is not required any transfer of personal data by the user. In particular, it is specified that cookies are not used for the purpose of profiling, but only technical cookies, with the aim of improving the quality of user navigation within the related site.

However, it is possible, by the user, to send a request for CONTACT for information request, upload their curriculum in the section "WORK WITH US", as it is possible for the user to participate in customer satisfaction surveys, promoted by the same treatment owner. These operations

involve the acquisition of personal data by Autel Srl, such as the address, e-mail or telephone number, necessary to fulfill user requests and for statistical analysis; and of personal data contained in the Curriculum vitae, belonging to categories of "particular" data protected by art. 9 par. 1 under Regulation (EU) 2016/679

However it is possible that these data will be used for the sole purpose of following up the user's request; should it be necessary, they will be processed for purposes related to contractual, tax and accounting obligations; historical billing; litigation and credit protection; fulfillment of obligations under current laws and may be disclosed to third parties only if this is necessary for this purpose

Regarding the data acquired for statistical analysis, such as the data collected during online questionnaires, will be used only for the purposes of customer satisfaction survey and for internal use aimed at improving the quality of the services offered to customers.

For the processing of personal data contained in the curriculum, which as anticipated may belong to "particular categories of data" (with reference to Article 9 paragraph 1 of EU Regulation 679/2016) it is necessary to provide the **CONSENT** to the treatment, according to art. 9. Par. 2. The lack of consent denies the holder the possibility to comply with the user's request, with the consequent inability to evaluate the candidate for the job position.

#### **Charged for treatment.**

The data will be processed by staff instructed by Autel Srl with procedures, technical and IT tools to protect the confidentiality and security of your data and consists in their collection, registration, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, cancellation, destruction of the same including the combination of one or more of above activities.

#### **Communication, dissemination and duration.**

Personal data may be communicated to third parties in order to be able to respond to information requests, or they may be communicated to the Institutions and Institutes for the fulfillment of legal obligations or judicial authorities, where required. Furthermore, the Company uses other companies and individuals to carry out certain activities such as sending e-mails, delivering parcels and making payments. The aforementioned subjects have access only to personal data strictly necessary to carry out their duties. The Company emphasizes the prohibition of use by the same for different purposes as well as the obligation of treatment in accordance Privacy Policy and current norms.

Within the scope of its activity and for the purposes indicated above, Autel Srl may use services rendered by third parties acting on behalf of Autel Srl, and according to its instructions, as data processors. These are subjects that provide the data controller with instrumental services (eg computer services for web-site working)

If you want, you can request a complete and updated list of the persons appointed responsible for the treatment by contacting one of the contacts listed below.

The information and personal data of visitors / users collected from this site, including data freely provided in order to obtain the sending of informative material or other communications by filling in the appropriate curriculum on the site, will be stored for the sole purpose of providing the service required and for the duration necessary for the same purpose. Once the service is completed, all personal data will be destroyed in accordance with this Privacy Policy, unless otherwise requested by the authority, conservation requirements established by law, or unless otherwise provided in particular

Your data **WILL NOT BE DISSEMINATED**

### **Particular data**

Through this website, Autel Srl does not deliberately collect particular categories of data, defined in art. 9 of EU Regulation 679/16 as data revealing racial or ethnic origin, political opinions, religious or philosophical convictions, or union membership, as well as genetic data, biometric data intended to uniquely identify a natural person, data relating to personal health, sexual life, sexual orientation.

We recommend to avoid providing this information through this site. In the event that the communication becomes necessary (for example: belonging to protected categories in case of sending a curriculum vitae for employment purposes, in response to a job announcement or in the case of an expression of interest to work at the Company), we invite you to send to the registered office of the Company by registered letter a special declaration containing the written consent for processing them.

### **Rights as data subject**

The interested party can express his rights listed below at any time by writing to the contacts provided in this statement

### **Rights as data subject art.15-22 of EU Regulation 679/16**

• **Article 15 Right of access:** right to obtain confirmation of whether or not personal data concerning you are being processed and, if this is the case, to obtain access to your personal data - including a copy of them - and communication, amongst other things, of the following information:

1. purposes of the processing
2. categories of personal data processed
3. recipients or categories of recipients to whom they have been or will be disclosed
4. data storage period or the criteria used
5. rights of the data subject (rectification, erasure of personal data, restriction of processing and right to object to processing)
6. right to lodge a complaint with the supervisory authority

- 7. right to receive information on the origin of personal data if they have not been collected from the data subject
- 8. the existence of automated decision-making, including profiling, and
- 9. meaningful information about the logic involved, as well as the envisaged consequences of such processing for the data subject;
- **Article 16 Right to rectification:** right to obtain, without undue delay, the rectification of inaccurate personal data concerning you and/or the completion of incomplete personal data;
- **Article 17 Right to erasure (right to be forgotten):** right to obtain, without undue delay, the erasure of personal data concerning you, when:
  1. the data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
  2. you have withdrawn consent and where there is no other legal ground for the processing;
  3. you have successfully objected to the processing of the personal data;
  4. the data have been unlawfully processed;
  5. the data have to be erased for compliance with a legal obligation;
  6. the personal data have been collected in relation to the offer of information society services referred to in article 8, comma 1 of EU Regulation 679/16

The right to erasure does not apply to the extent to which the processing is necessary for compliance with a legal obligation or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller, or for the establishment, exercise or defence of legal claims.

- **Article 18 right to restriction of processing :** right to obtain restriction of the processing, when:
  1. the accuracy of the personal data is contested by the data subject;
  2. the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
  3. the data subject needs the personal data for the verification, exercise or defence of a right during judicial proceedings;
  4. the data subject has objected to processing pending the verification whether the legitimate grounds of the controller override those of the data subject.
- **Article 20 right to data portability:** right to receive the personal data concerning you, which you have provided to the Data Controller, in a structured, commonly used and machine-readable format and the right to transmit those data to another controller without hindrance, if the processing is based on consent and is carried out by automated means. In addition, the right to have your personal data transmitted directly by the Data Controller to the other controller, where technically feasible.
- **Article 21 right to object:** right to object to the processing of personal data concerning you, unless there are legitimate grounds for the Data Controller to continue the processing;

At any time, data user will have the right to exercise the rights established by current legislation by sending a specific request to the privacy office, located in Via D. Bagnoli 9, 41049 Sassuolo (MO) Italy, Telephone + 39-536-802104, Email info @ aeautel.it