

## **PRIVACY POLICY – COOKIE POLICY**

Prepared pursuant to Article 13 of EU Regulation 2016/679

### **WHY THIS INFORMATION**

Pursuant to EU Regulation 2016/679 (hereinafter "Regulation"), this page describes the methods used to process the personal data of users who visit [www.softitalia.com](http://www.softitalia.com) (hereinafter "Site").

This information does not apply to other sites, pages, or online services accessible via hyperlinks published on the Site but referring to resources outside the Site's domain.

### **DATA CONTROLLER**

SOFT ITALIA S.P.A. (hereinafter "Controller"), with registered office at Via Tosco Romagnola 1 – 56012 Calcinai (PI).

Contact email: [info@softitalia.com](mailto:info@softitalia.com)

### **DATA PROTECTION OFFICER**

The Data Controller does not require the appointment of a data protection officer pursuant to Article 37 of the Regulation.

### **TYPES OF DATA PROCESSED**

Data provided directly by the user

This category includes all personal data provided voluntarily by the user (for example, by calling the telephone numbers on the site, sending emails to the addresses listed on the site, filling out forms on the site, etc.).

Cookies and other tracking systems

This version of the site does not use tracking cookies. However, it does use necessary and technical cookies, including those that ensure the proper functioning of the site. These cookies do not require the user's consent.

### **PURPOSES AND LEGAL BASIS**

Personal data provided voluntarily by the user is used exclusively to process any requests made and to fulfill legal obligations and/or pre-contractual obligations and/or contractual obligations arising from the relationship that the user may establish with the Data Controller. The legal bases for the processing of such data are therefore the fulfillment of obligations arising from the contractual and pre-contractual relationship, as well as legal obligations. If necessary, the data may also be used based on the data controller's legitimate interest in carrying out defensive activities or in asserting or defending a right in court.

### **METHODS OF PERSONAL DATA PROCESSING**

The collected data is processed using computerized tools and only occasionally in paper form. For data processing related to the Website's services, the Data Controller uses servers located within Europe and IT systems located at the Data Controller's headquarters. Their transfer abroad is not envisaged. Technical and organizational measures are adopted to ensure an adequate level of security and prevent data loss, illicit or incorrect use, and unauthorized access. Data provided directly by the interested party is retained for the time strictly necessary to process the interested party's requests and is then deleted, except in cases of product purchases (in which case the data may be retained for the entire duration of the relationship and in accordance with legal obligations) and for defense purposes (which may require further retention).

Browsing data does not persist for more than seven days and is deleted immediately after aggregation, except in the event of judicial authorities needing to investigate criminal offenses.

#### **NATURE OF THE PROVISION OF PERSONAL DATA**

With the exception of browsing data, which is required to implement IT and electronic protocols, the provision of data by users through the methods made available on the Site is free and optional. However, failure to provide the data will make it impossible for the Data Controller to process requests submitted or intended to be submitted by the user.

#### **DATA RECIPIENTS**

The Data may be processed by employees or collaborators expressly designated as "authorized data processors" and/or appointed as "data processors." The complete list of data processors is available at the Data Controller's offices. The Data will not be transferred to third countries or disseminated in any way.

#### **RIGHTS OF DATA SUBJECTS**

Data subjects have the right to obtain from the Data Controller, where applicable, access to their personal data and the rectification or erasure of such data, the restriction of processing concerning them, or the right to object to processing, and the right to data portability (Articles 15 et seq. of the Regulation).

Requests should be addressed to [info@softitalia.com](mailto:info@softitalia.com)

#### **RIGHT TO COMPLAIN**

Data subjects who believe that the processing of their personal data carried out through this Site violates the provisions of the Regulation have the right to lodge a complaint with the Data Protection Authority, as provided for by Article 77 of the Regulation, or to take appropriate legal action (Article 79 of the Regulation).