# Icona Technology Privacy Policy Ver 1.0



## Information on the processing of personal data

Within the meaning of Art. 13 of Legislative Decree No 196 of 30.6.2003 and Art. 13 of Regulation (EU) 679/2016

This privacy statement describes the aims and means of processing of personal data of users, customers and licensees that visit the websites www.iconatech.com (hereinafter for brevity the "site") and/or that interact with the site.

Navigation on the site is free and reserved for people of legal age and does not require registration on the site.

The information on the site are provided by the owner free of charge and in good faith, in no event shall the owner be liable for any direct or indirect damage caused by the use of the site. This information may be subject to update without notice, the user, continuing to browse the site, fully and automatically accepts the changes.

The information is provided only for the site www.iconatech.com and not for other websites that may be consulted by the user through links; in the latter case, the information on the processing of personal data will be provided by the owner of third party websites.

#### **Data controller**

The Data Controller is Icona Technology Spa in the person of its legal representative pro tempore, with registered office in Viale Brianza no. 20, 20092 Cinisello Balsamo (MI) Italy.

#### Nature of the processed data

The Data Controller collects and processes the following categories of personal data:

- a) a) Data provided spontaneously by the User who voluntarily interacts with the site by contacting Icona;
- b) b) Data deriving from the navigation of the User on the site: the so-called "navigation data" are acquired automatically during the navigation of the User on the site and are necessary for the correct functioning of the site itself. This data is not collected for the purpose of identifying the User but only for the purpose of obtaining anonymous statistical information in aggregate form on the use of the sites as well as to verify the proper functioning of the site.

Navigation data could be communicated by the owner to the competent authorities, in case of computer crimes against the site and could be used by the authorities to ascertain responsibility and identification of those responsible.

#### Purposes of the processing

The personal data communicated by Users will be processed by the Controller for the following purposes:

- 1) Interacting with the User to acknowledge their requests for information or assistance:
- 2) To perform statistical analysis in an anonymous and aggregate form;
- 3) To implement legal obligations or regulations in force;
- 4) Manage any complaints and allow the owner to protect their rights.
- 5) The provision of data by the user is not mandatory, but it is necessary for the purposes identified above. The interested party has the right not to provide personal data; in case of failure to provide such data, however, it will not be possible to provide the services requested.

### **Processing procedures**

The data will be processed lawfully, correctly and in accordance with the principles of necessity, relevance, completeness and not exceeding the data collected for the purposes of treatment.

The owner will treat the User's data in such a way as to ensure, in relation to the purposes for which the data were collected, security and confidentiality, and to prevent unauthorized access to such data.

The personal data subject to processing will be kept for the period of time necessary to achieve the purposes identified above and, subsequently, for the period of time in which Icona Technology is subject to storage obligations for tax purposes, in addition to the purposes provided for by law or regulations.

The processing and storage of data will take place at the headquarters of the data controller, and using servers located within the European Union.

The data will be processed exclusively by personnel specifically appointed for this purpose and by data processors appointed by Icona Technology.

For some processing operations, the Data Controller may also avail itself of the services of third parties who must, in any case, comply with the instructions specifically given by the Data Controller in order to guarantee the security and confidentiality of the data entrusted to them.

The data collected will not be disseminated and will not be communicated without the express consent of the user, except for necessary communications that may involve

the transfer of data to public bodies, consultants or other entities for the fulfillment by the owner of legal obligations.

The Owner does not adopt any automated decision-making process.

#### Rights of the data subject

At any time, the User may exercise the rights recognized by the GDPR; by way of example but not limited to, the right to:

- request confirmation of the existence or otherwise of their personal data with the Data Controller;
- ii. to obtain information about the purposes of the processing, the categories of personal data, the recipients or categories of recipients to whom the personal data have been or will be communicated and, when possible, the period of storage
- iii. to know the identification details of the data controller and of any Data Processors and DPO, if appointed;
- iv. obtain the rectification and deletion of data (upon the occurrence of one of the conditions indicated in Article 17, paragraph 1 of the GDPR and in compliance with the exceptions provided for in paragraph 3 of the same article);
- v. obtain the limitation of processing (upon the occurrence of one of the cases indicated in Article 18, paragraph 1 of the GDPR);
- vi. obtain the portability of the data, i.e. receive them from the data controller, in a structured, commonly used and machine-readable format, in order to transmit them to another data controller without hindrance;
- vii. oppose, for legitimate reasons, the processing of their data;
- viii. to object to an automated decision-making process concerning fixed persons, including profiling.
- ix. oppose the processing for purposes of commercial information or for sending advertising materials or direct selling or market research;
- x. revoke consent at any time without affecting the lawfulness of the processing based on the consent given before revocation;
- xi. to lodge a complaint with a supervisory authority.

#### Communications

The User can contact Icona Technology Spa at any time, for any request for clarification or information, at the local unit located in Viale Brianza, 20 - 20092, Cinisello Balsamo (MI), or at the e-mail address legal@icona.it.

