

PRIVACY AND COOKIES POLICY

According to Article 13 of the European Regulation No. 679 of 2016 (the “**Privacy Regulation**”), as well as Recommendation No. 2 of 2001 adopted under Article 29 of Directive No. 95/46/EC, **MECCANICA TONEL SERGIO S.R.L. IN SHORT, M.T.S. S.R.L.** intends to inform all users and/or visitors of www.meccanicatonelsergio.it/ <http://www.mts-srl.com/> (respectively, the “**Users**” and the “**Website**”), regarding the use of personal data, log files, and cookies collected through the Website.

1. Data Controller, Data Processors and Data Protection Officer

The Data Controller is **MECCANICA TONEL SERGIO S.R.L. IN SHORT, M.T.S. S.R.L.** (Tax Code and VAT number 04823880010), with registered office at Via Trieste 154, 10080 BOSCONERO (TO), e-mail info@meccanicatonelsergio.it (hereinafter the “**Data Controller**”).

The updated list of designated Data Processors can be provided upon request by the data subjects and/or users. The company has not appointed a Data Protection Officer.

2. Information automatically collected by the Website - Cookies

a) Automatically collected information

Like all websites, our Site uses log files that store information collected automatically during visits. The IT systems and software procedures responsible for the operation of the Site automatically collect certain information during use, the transmission of which is inherent in the use of Internet communication protocols.

The following information is collected:

- Internet Protocol (IP) address or the domain name of the device being used;
- browser type and parameters of the device used to connect to the Website;
- the addresses in Uniform Resource Identifier (URI) notation of the requested resources or the method used in submitting the request to the server;
- Internet Service Provider (ISP) name;
- Date and time of visit;
- the User's referring web page (referral) and exit page;
- possibly the number of clicks;
- the size of the file obtained in response;
- the numeric code indicating the status of the response given by the server (successful, error, etc.);
- other parameters related to the device's operating system and computing environment.

This information is processed automatically and collected only in aggregate form for the purpose of verifying the proper functioning of the Website.

b) Cookies

Cookies are used on the Website. Cookies are text files stored on a computer system that allow certain parameters and data to be recorded and communicated to the system through the browser used. These tools, therefore, enable the analysis of user habits on the Website for different purposes: performing electronic authentications, session monitoring, storing information on specific configurations of users accessing the server, storing preferences, etc.

Cookies are classified into:

- a. **Technical cookies:** these are used to facilitate browsing or provide a requested service. Without these cookies, some operations could not be carried out or would be more complex and/or less secure.
- b. **Profiling cookies:** these are used to track browsing and create profiles based on tastes, habits, choices, etc. In this way, they can transmit targeted advertising messages to devices in line with preferences already expressed during previous online browsing.

The installation of technical cookies does not require consent. However, consent is required for the installation of profiling cookies. If you do not wish for your device to receive and store profiling cookies, you can modify your browser's security settings. In fact, you can change your browser settings to delete and/or block the installation of cookies on your device.

However, please note that disabling profiling cookies may affect your ability to fully use certain features of the Website.

While browsing the Website, your device may also receive cookies sent by websites or web servers different from ours (referred to as “**Third Parties**”). The Third Parties that use cookies on our site include:

- Mozilla Firefox, whose privacy policy can be found at <https://support.mozilla.org/it/kb/Gestione%20dei%20cookie>
- Google Chrome, whose privacy policy can be found at <https://support.google.com/chrome/answer/95647?hl=it>
- Internet Explorer, whose privacy policy can be found at <http://windows.microsoft.com/it-it/windows-vista/block-or-allow-cookies>
- Safari 6/7 Mavericks, whose privacy policy can be found at https://support.apple.com/kb/PH17191?viewlocale=it_IT&locale=it_IT
- Safari 8 Yosemite, whose privacy policy can be found at https://support.apple.com/kb/PH19214?viewlocale=it_IT&locale=it_IT
- Safari on iPhone, iPad, or iPod touch, whose privacy policy can be found at <https://support.apple.com/it-it/HT201265>

By using the Website, you acknowledge and accept the use of Cookies and consent to the processing of data collected by Third Parties.

3. The personal data provided through the use of the Website: for what purposes will they be processed?

The personal information requested and provided to us is needed to enable you to access the

www.meccaniconelsergio.it (hereinafter the “**Website**”) and use the following services (the “**Website Services**”):

- Consult the Catalog/products/services;
- Be Contacted;
- Access the WORK WITH US area;
- Use the DOWNLOAD service.

Data is processed for the following purposes:

- (i) technical management of the Website; (ALL)
- (ii) collect users' details through the completion of a dedicated form to fulfill informational/commercial contact requests (CONTACTS)
- (iii) share technical and commercial information (PRODUCT/SERVICE CATALOG)
- (iv) possible establishment of a working partnership (WORK WITH US);
- (v) allow the downloading of technical information about products or services (DOWNLOAD)

The processing of data for the above-mentioned purposes will be carried out in accordance with the Privacy Code, the Privacy Regulation, and all relevant sector-specific regulations, including the provisions set out in the “Guidelines of the Data Protection Authority for Loyalty Programs” dated 24 February 2005, and the “Guidelines on the Processing of Personal Data for Online Profiling” dated 19 March 2015.

In accordance with the “Guidelines on Promotional Activities and the Spam Prevention” of 4 July 2013, we want to clarify that any consent given for receiving commercial, promotional, and marketing communications via automated means will also apply to traditional contact methods.

The data provided will be processed primarily using electronic tools under the authority of the Data Controller, by individuals specifically appointed, authorized, and trained in accordance with Articles 28 and 29 of the Privacy Regulation. We also inform you that appropriate security measures are in place, as required by Articles 5 and 32 of the Privacy Regulation, to prevent data loss, unlawful or incorrect use, and unauthorized access.

4. Mandatory or optional consent for the provision of data, the consequences of refusal and the legal basis for the processing

Please note that for the purposes referred to in points (i), (ii), (v) and possibly subsequent points, of Article 3 above, providing personal data is mandatory, as failure to do so will make it impossible to use the Services offered by the Website.

On the other hand, the provision of personal data is not mandatory but optional for the purposes referred to in points (iii) and (iv) of Article 3 above. If you do not provide data for the previously mentioned purposes, we will not be able to provide you with the Newsletter or the Marketing Services, or carry out Profiling Activities. For this purpose, you are free to decide whether or not to give your consent for these purposes as well, and without this inhibiting your ability to access the Services offered by the Website.

Please note that, if you wish, you may request the data controller to delete your data at any time, by sending a simple communication without any specific formal requirements to the addresses indicated in Article 1 above.

With reference to the purposes referred to in points (i), (ii), (v) and possibly the subsequent ones, of Article 3 above, the legal basis of the processing consists of the execution of the services provided through the Website and requested (pursuant to Article 6, paragraph 1, letter b of the Regulation); on the other hand, with reference to the purposes referred to in points (iii) and (iv) of Article 3 above, the legal basis of the processing is any freely given consent (pursuant to Article 6, paragraph 1, letter a of the Regulation).

5. To whom and in what context can we send the data?

The data may be disclosed to the following parties within the EU in full compliance with the provisions of the Privacy Code and the Privacy Regulation:

- (i) tax authorities and/or other public authorities where required by law or at their request;
- (ii) external entities and companies used by the Data Controller to carry out activities related to or necessary for the execution of the Website Services - including the cloud computing archiving service - the sending of the Newsletter and Profiling Activities;
- (iii) external consultants (e.g., for tax compliance management), unless designated in writing as Data Processors;
- (iv) credit institutions for purposes instrumental to the eventual purchase of goods/services if provided anywhere on the website.

The information collected automatically by the Website, referred to in paragraph 2, as well as some anonymous data relating to the number and type of interactions on activities related to customer loyalty in the strict sense, may also be transferred to Third Party cloud servers located outside the EU, as this processing is necessary for the execution of the requested Website Services. The legal basis for this processing is, therefore, Article 49, paragraph 1, letter b of the Privacy Regulation.

6. The rights

Please note that you may exercise your rights under Articles 15, 16, 17, 18, 20 and 21 of the Privacy Regulations at any time by sending a written notice to the Data Controller's contact details mentioned in Article 1 above and, to that effect, obtain:

- confirmation of the existence or non-existence of personal data, along with the indication of its source, as well as the ability to verify its accuracy or request updates, corrections, or additions;
- access, rectification, deletion of data or restriction of processing;
- deletion, anonymization, or blocking of data processed in violation of the law. You also have the right to object to the processing of personal data previously provided.

With regard to the Newsletter, you have the right to request the cessation of processing through automated contact methods, which also applies to traditional ones. You can also choose to exercise this right partially, for example, by asking to stop receiving promotional communications via one or more of the contact methods you initially consented to.

7. Duration of the Processing

Subject to legal obligations, personal data will be stored for a specified period, based on criteria related to the nature of the services provided.

Please note that data retained for profiling or marketing purposes will be kept for a period not exceeding 12 and 24 months, respectively, from the date of collection.

8. Security measures

The data collected through the Website is processed in accordance with applicable laws and protected by appropriate security measures, as required by the current regulations, including Articles 5 and 32 of the Privacy Regulation.

In this regard, we confirm that appropriate security measures have been implemented to prevent unauthorized access, theft, disclosure, alteration, or destruction of the processed data.

9. Changes to the Privacy Policy

The Data Controller reserves the right to make changes to this Privacy Policy. In such cases, users will be promptly informed the next time they use the Website.

This policy was issued in January 2019.

PRIVACY POLICY

pursuant to Article 13 of EU Regulation 679/2016

MECHANICS TONEL SERGIO S.R.L. IN SHORT, M.T.S. S.R.L. (hereafter, the “**Data Controller**”), as the Data Controller, pursuant to Article 13 of the EU Regulation 679/2016 (hereinafter, the “**Privacy Regulation**”), as amended and supplemented, collects and subsequently processes personal data¹ of its Customers and Suppliers (hereinafter, the “**Data Subject**”).

1. Processing purposes and methods.

The Data Subject's personal data is processed as part of the Data Controller's normal business for the following purposes:

1. correct and complete fulfillment of the obligations arising from the contractual relationship established. (hereinafter, the “**Contract**”);
2. administrative and accounting obligations strictly related to the Contract;
3. fulfillment of specific obligations required by law, regulations, or European Union legislation (e.g., those related to “anti-money laundering”);
4. updating the Data Subject about promotional and marketing initiatives, including the sending of advertising and/or promotional material (e.g., newsletters), through automated tools and/or traditional contact methods.

Personal data processing is carried out under the authority of the Data Controller by specifically appointed, authorized, and trained individuals, in accordance with Article 29 of the Privacy Regulation, using manual, electronic, or telematic instruments, following methods strictly related to the purposes and ensuring the confidentiality and security of personal data. Personal data may also be processed on behalf of the Data Controller by Data Processors specifically appointed under Article 28 of the Privacy Regulation.

Personal data will be kept for a determined period based on criteria related to the nature and duration of the Contract and the need to protect the interests of the Data Subject.

2. Legal basis for processing, nature of data provision, and consequences of any refusal, as well as the consent of the Data Subject.

2.1) Purposes referred to in paragraph 1, points 1., 2. and 3. above.

With regard to the purposes mentioned in the previous paragraph 1, points 1, 2, and 3, the provision of personal data is mandatory and necessary for the execution of the Contract. Failure to provide the required data will prevent the performance of the services outlined in the Contract. Therefore, the legal basis for the processing of such data is the correct execution and management of the Contract.

2.2) Purposes referred to in paragraph 1, point 4. above

With regard to the purpose outlined in the previous paragraph 1, point 4, providing the data is optional. The failure to give consent will only result in the inability to receive updates on promotional and marketing initiatives, including the sending of advertising and/or promotional material (e.g., newsletters).

3. Subjects or categories of subjects to whom personal data may be disclosed and scope of communication.

In relation to the purposes of the processing outlined above, and to the extent strictly necessary for these purposes, the personal data of the data subject may be disclosed to the following categories of recipients:

- (i) tax authorities and other public authorities where required by law or at their request;

¹ According to Article 4 of the Privacy Regulation, “**personal data**” means: “*any information relating to an identified or identifiable **natural person** (“**data subject**”); an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that person*”.

- (ii) credit institutions for payment arrangements or other financial activities instrumental to the execution of the Contract;
- (iii) external structures and/or companies that the Data Controller uses, in charge of carrying out activities related, instrumental or consequent to the execution of the Contract;
- (iv) external consultants (e.g., for tax compliance management), unless designated in writing as Data Processors;
- (v) external parties performing control activities, such as auditing firms, board of auditors, supervisory body;
- (vi) factoring companies and/or specialized companies or law firms to recover debts and/or protect their interests/rights;

The aforementioned subjects, to whom the personal data of the data subject may be communicated (as they are not designated in writing as Data Processors), will process the personal data as Data Controllers under the Privacy Regulation, independently, as they are unrelated to the original processing carried out by the Data Controller.

The updated list of the aforementioned subjects and Data Processors can be provided upon request by the Data Subject.

The Data Subject's data will not be disseminated.

If necessary for the execution of the Contract, the data subject's personal data may be transferred to EU countries and/or non-EU countries, in full compliance with the provisions of the Privacy Regulation, as well as with the decisions and guidelines of the Data Protection Authority and applicable EU legislation. Specifically, the Data Controller undertakes to comply with the provisions set out in decisions 2001/497/EC, 2004/915/EC, and 2010/87/EU (as applicable), which require the signing of so-called "standard contractual clauses" between the legal entities involved in the processing of non-EU data.

4. The Data Subject's rights.

Articles 15 and following of the Privacy Regulation grant the Data Subject the right to obtain:

- confirmation of the existence or non-existence of personal data concerning them, even if not yet recorded, and their communication in an understandable form;
- indication of the origin of personal data, the purposes and methods of processing, the logic applied in the case of processing carried out with the aid of electronic tools, and the identification details of the data controller;
- updating, rectification, integration, deletion, transformation into anonymous form, or blocking of data processed in violation of the law (including data that no longer needs to be retained for the purposes for which it was collected or subsequently processed). A statement that these operations have been brought to the attention of those to whom the data have been communicated or disseminated (including with regard to their content), except in cases where such compliance is impossible or would involve the use of means clearly disproportionate to the protected right.

The Data Subject also has the right:

- revoke the consent given for the processing of personal data at any time, where applicable (without affecting the lawfulness of the processing based on the consent given prior to the withdrawal);
- object, in whole or in part, on legitimate grounds, to the processing of his or her personal data, even if relevant to the purpose of collection;
- object, in whole or in part, to the processing of his or her personal data for the purpose of sending advertising or direct sales material or for carrying out market research or commercial communications;

- lodge a complaint with the Data Protection Authority in the cases provided for in the Privacy Regulation;
- the portability of personal data within the limits of Article 20 of the Privacy Regulation.

To know the detailed and constantly updated list of subjects to whom the personal data of the Data Subject may be communicated and to exercise the rights referred to in Articles 15 et seq. of the Privacy Regulation, the Data Subject may contact the Data Controller:

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Bosconero 01/01/2019