



People Making Business

### PRIVACY POLICY: INFORMATIVE ART. 13 EU REGULATION 679/2016

Regulation concerning the protection of individuals with regard to the processing of personal data, and to the free movement of such data (General Data Protection Regulation)

Dear User,

**Comestero Sistemi SpA** is particularly attentive to the privacy aspects of its customers / users. Through this page it intends to describe how to manage its website ([www.comestero.com](http://www.comestero.com)) with reference to the processing and protection of personal data of customers / users who access it. This is a general statement made in compliance with EU Regulation 679/2016 "Regulations concerning the protection of individuals with regard to the processing of personal data, as well as the free movement of such data" to those who consult the website of **Comestero Sistemi SpA**. The simple consultation of this site, as well as the registration in it, in fact, may involve the registration, use, cancellation and, more generally, the processing of personal data relating to identified or identifiable users. Only for the institutional website of **Comestero Sistemi SpA** and not for any other websites that may be consulted by the user through links in its pages for which **Comestero Sistemi SpA** is in no way responsible.

#### HOLDER OF THE TREATMENT

The data controller is **Comestero Sistemi Spa** (hereinafter the Data Controller also) with registered office in Via Bolzano 1 / E - 20871 Vimercate (MB) - Italy, Tel + 39.039.625091 - email: [info@comestero.com](mailto:info@comestero.com).

#### TYPE OF DATA COLLECTED, PURPOSE OF DATA PROCESSING AND CONFERENCE BY THE INTERESTED PARTY (USER)

"Data processing" means any operation or set of operations performed with or without the aid of automated processes and applied to personal data or sets of personal data, such as collection, registration, organization, structuring, the conservation, adaptation or modification, extraction, consultation, use, communication by transmission, dissemination or any other form of making available, comparison or interconnection, limitation, deletion or destruction (Article 4 Comma 2 EU Regulation 679/2016). The entry of data for access to this site involves their acquisition for the purposes indicated below. The user is clearly free to choose whether to provide his / her data, inserting them in the appropriate forms for registration.

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 information is not collected to be associated with identified interested parties, but due to its very nature could, through processing and association with data held by third parties, allow users to be identified and have the purpose, for the company, to derive anonymous statistical information on the use of the site.

Data provided voluntarily by the user (Article 4, Comma 1 EU Regulation 679/2016) - The optional, explicit and voluntary sending of e-mails to the addresses indicated on this site entails the subsequent acquisition of the sender's address, necessary to reply to requests, as well as any other personal data included in the message. Specific summary information will be progressively reported or displayed on the pages of the site prepared for particular services on request.

Personal data relating to users of the site may be used in order to obtain anonymous statistical information on the use of the site, to check its correct functioning and to ascertain any responsibility in case of offenses committed to damage the site, the Owner or third parties. With reference to users, as well as for the purposes described above, the data will be processed in order to:

- rendere possibile l'accesso e la navigazione nel sito
- make it possible to access and browse the site
- provide the user with the services / products offered by **Comestero Sistemi Spa**
- provide the user with the requested information through voluntary sending of e-mail
- manage any applications (search, selection and evaluation of personnel) sent spontaneously by the User or in response to an announcement
- manage legal obligations related to civil, tax and accounting, administrative management of the relationship, fulfillment of any contractual obligations, support and technical information about the products and services object of the relationship
- manage marketing activities and promotional and advertising initiatives aimed at the market, only with express consent
- **Comestero Sistemi Spa** will not collect from its site under any circumstances data referred to in Articles 9 and 10 of EU Regulation 679/2016.

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. As a consequence, the mere access to the site implies the acquisition by the manager of information and data concerning the user. The provision of data in the forms of information request and self-candidature, is optional because they are collected by the writer to make optimal the performance of their business. The refusal to provide this data could make it impossible to send any information of an organizational, technical and commercial nature, or to obtain what requested.

#### MODALITIES OF DATA PROCESSING, COMMUNICATION AND STORAGE

The treatments related to the consultation of the Site take place at the headquarters of Comestero Sistemi Spa. As regards the methods for collecting and processing data, we would like to inform you that the data in our possession will be

**COMESTERO SISTEMI S.p.A.**  
[www.comesterosistemi.com](http://www.comesterosistemi.com)

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processed in written form and / or supported paper, magnetic, electronic or telematic, with suitable tools to guarantee the confidentiality and security of the same in accordance with the provisions of EU Regulation 679/2016 (with particular reference to Articles 24, 32 and 35). The data will be processed with lawfulness, fairness and transparency and protection of privacy and user rights only by personnel directly authorized by the Data Controller, or by the Data Processors specifically appointed pursuant to Art. 28 of EU Regulation 679/2016 (list available from the Data Controller).

In particular, the data of "registered" users may be communicated to third parties who provide the goods / services available on the site and to third parties who perform data analysis activities for statistical purposes and in any case within the limit of the purposes of the treatment described above. This communication can be made both to subjects allocated on the national territory, both to subjects allocated abroad in countries belonging to the European Union. The data may also be disclosed to third parties responsible for maintaining the site by the Owner and under his supervision. No personal data acquired from the site will be disseminated. No data profiling activities are performed. The personal data provided by users who spontaneously submit requests for information are used only to perform the service requested and for the time strictly necessary to achieve the purposes for which they were collected.

### COOKIE POLICY

This site uses cookies to make its services simple and efficient for users who view the pages of the site. Users who view the site, will enter the minimum amount of information in the devices in use, which are computers and mobile devices, in small text files called 'cookies' saved in the directories used by the user's web browser. There are various types of cookies, some to make more effective use of the Site, others to enable certain features. Analyzing them in detail, our cookies allow:

- memorize the entered preferences
- avoid re-entering the same information several times during the visit such as user name and password
- analyze the use of the services and content provided by the site to optimize the browsing experience and the services offered

### TYPES OF COOKIES USED BY THE SITE

Following the various types of cookies used by the site according to the purpose of use:

#### → TECHNICAL COOKIES

This type of cookie allows the proper functioning of certain sections of the Site. They are of two categories: persistent and session:

- persistent: once the browser is closed they are not destroyed but remain up to a preset expiration date
- of sessions: they are destroyed every time the browser is closed

These cookies, always sent from our domain, are necessary to view the site correctly and in relation to the technical services offered, will therefore always be used and sent, unless the user does not change the settings in your browser (thus disrupting the display of site pages)

#### → AN ANALYTICAL COOKIES

Cookies in this category are used to collect ANONYMOUS information on the use of the site. The site will use this information in respect of anonymous statistical analysis in order to improve the use of the Site and to make the content more interesting and relevant to the wishes of users. This type of cookie collects anonymous data on the activity of users and how it arrived on the Site. Analytical cookies are sent from the site itself or from third-party domains

#### → THIRD PARTY SERVICES ANALYSIS COOKIES

These cookies are used in order to collect information on the use of the Site by users in ANONYMOUS form such as: visited pages, time spent, origins of the traffic of origin, geographic origin, age, gender and interests for the purpose of marketing campaigns. These cookies are sent from third-party domains external to the Site

#### → COOKIES TO INTEGRATE THIRD-PARTY SOFTWARE PRODUCTS AND FUNCTIONS

This type of cookie integrates features developed by third parties within the pages of the site such as icons and preferences expressed in social networks in order to share site content or for the use of third-party software services (such as software for generate maps and additional software that offer additional services). These cookies are sent from third-party domains and from partner sites that offer their functionality between the pages of the Site

#### → PROF PROFILING COOKIES

These cookies are necessary to create user profiles in order to send advertising messages in line with the preferences expressed by the user within the pages of the Site. This site **DOES NOT USE PROFILE COOKIES**

The site, according to current legislation, is not required to seek consent for cookies and technical analytics, as necessary to provide the required services. For all other types of cookies, consent may be expressed by the User with one or more of the following methods:

- By specific configurations of the browser used or the related computer programs used to navigate the pages that make up the Website
- By changing settings in the use of third-party

Both of these solutions may prevent the user from using or viewing parts of the Website.

### WEBSITES AND THIRD PARTY SERVICES

The Site may contain links to other Web sites that have their own privacy policy which may be different from that adopted by our site and for which we do not respond.

### How to disable cookies by configuring the browser

- Mozilla Firefox



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- Google Chrome
- Internet Explorer
- Safari 6/7 Mavericks
- Safari 8 Yosemite
- Safari su iPhone, iPad, o iPod touch

#### Google Analytics

Any cookies of Google Analytics, a web analytics service provided by Google to allow the analysis of the use of the platform by the user, are collected in **ANONYMOUS** form. For more technical information (<https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>).

The information generated by cookies about user activity on this site are normally transferred and stored on a Google server in the United States. The site also uses Google Analytics for the analysis and creation of profiles of interest for Remarketing purposes (Google Display Network) during advertising campaigns. For this purpose Google uses cookies (third-party cookies). You can disable the use of cookies by selecting, on your browser, the settings that allow you to reject them, however, in this case, it is possible that some functions of the site are no longer available. In addition, you can prevent the collection and processing of data generated by cookies on the use of this site (including your IP address) by downloading and installing the following plug-in on your browser. (<https://tools.google.com/dlpage/gaoptout?hl=en>).

#### RIGHTS OF THE INTERESTED

The subjects to whom the personal data refer have the right at any time to obtain confirmation of the existence or otherwise of the same data and to know its content and origin, verify its accuracy or request its integration or updating, or the correction, cancellation or limitation, or to oppose their treatment, to lodge a complaint with the supervisory authority pursuant to Art. 15 of EU Regulation 679/2016. Furthermore, pursuant to Articles 16, 17, 18, 19, 20, 21 and 22 of the same EU Regulation 679/2016, the interested party has the right to request rectification, cancellation (right to be forgotten), limitation treatment, notification in case of rectification or cancellation of personal data or limitation of processing, data portability, transformation into anonymous form or blocking of data processed in violation of the law, and to oppose in any case, for legitimate reasons, to their treatment.

In order to exercise these rights, you can contact the Data Controller as indicated above.

This Privacy Policy may be subject to updates or amendments, especially as a result of the entry into force of any new directives of the competent Authority.

Having read the above information I authorize the processing of my personal data

YES  NO

Furthermore, I authorize the processing of data also for marketing activities and promotional and advertising initiatives

YES  NO