



OFFICINE AMBROGIO MELESI & C. S.R.L.

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Web site: www.melesi.it R.E.A. n. LC-108835
N.Mecc./Export n. LC005895

WEBSITE PRIVACY POLICY

This policy is provided to natural persons who access and use the website of **OFFICINE AMBROGIO MELESI & C. S.r.l.**, pursuant to Italian Leg. Decree 196/2003 "Personal Data Protection Code" and subsequent amendments and articles 13 - 14 of Regulation EU 2016/679 "European Regulation on the protection of natural persons with regard to the processing of personal data" to inform them of the essential elements about the processing carried out.

Data Controller

The Data Controller is the company, **OFFICINE AMBROGIO MELESI & C. S.r.l., with offices in Italy, Cortenova (LC) Largo De Vecchi No. 11, in the person of the pro tempore legal representative.**

Data processors and appointees

The updated list of the data processors and appointees is kept at the offices of the data controller.

Purpose of the processing

The personal data are collected and processed for the purpose of:

1. verifying the identity of the party requesting information, quotes, product delivery and fulfilment of services, in addition to carrying out necessary support;
2. transmitting the information specifically requested by the data subject;
3. fulfilling orders or providing the services requested by the data subject or by a party appointed by the latter (service provider);
4. sending out marketing communications, special offers, advertising material and market surveys related to the products being sold or services provided (marketing);
5. sending out marketing communications, special offers, advertising material via email about products and services similar to those requested by the data subject or appointed party (soft spam);
6. creating a profile through the use of profiling cookies, where accepted (profiling);
7. fulfilling legal obligations (compliance);
8. protecting the interests of the company, including legal interests in and out of court;
9. preventing or identifying any abuse of website use or any fraudulent activity.

Legal basis for and mandatory or optional nature of the processing

The data processed for the purposes indicated under points 1, 2, 3, 7, 8, 9 of the section labelled "Purpose of the processing" are essential for entering into the contractual relationship (including the pre-contractual stage) and/or its execution.

The data, processed for the purposes, indicated under points 4 and 6, do not derive from an obligation and providing them is optional and based on consent by the data subject.

The data indicated under point 5 are not mandatory and do not require consent for their processing, however, the data subject shall have the right to object at any time.

The extent and suitability of the data provided will be assessed on a case-by-case basis to determine the subsequent decisions and avoid the processing of data beyond the intended purposes.

Storage time

The personal data collected and processed by the data controller will be stored in full compliance with the legislation in force as defined below:

- provision of services: the data will be kept for the time strictly necessary to fulfil these purposes and also for a longer period in order to protect the interests of the company;
- marketing and profiling: the data will be stored until consent is revoked;
- soft spam: the data will be kept until the data subject objects to the processing through the procedure indicated in every single soft spam email;
- compliance: the data will be stored for the period laid down by the relevant legislation in force;
- abuse or fraud: the data will be stored for the time strictly necessary for this purpose and, therefore, until the company is required to store them to protect itself legally and communicate them to the competent authorities;

Data storage place

The data are currently processed and stored at Officine Ambrogio Melesi premise in Cortenova in Largo de Vecchi,11.

They are also processed on behalf of the data controller by professionals and/or companies appointed to carry out technical, management, development, administrative, accounting, fiscal and legal activities, etc.

The company hereby reserves the right to use servers, cloud services and any other IT tools for storing and managing personal data owned or managed by third parties, ensuring that the service providers will be selected from those who supply suitable safeguards, as per article 46 of Regulation EU 2016/679 "European Regulation on the protection of personal data".



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The data subject's rights

The data subject shall, at any time, under Italian Leg. Decree 196/2003 and subsequent amendments and articles 15 to 22 of Regulation EU 2016/679¹, have the right to:

1. **Accessing your data.** The data subject shall have the right, at any time, to request and obtain from the data controller, information on the personal data processed (including confirmation as to whether or not personal data concerning him or her are being processed). He/she also has the right to access these data under article 15 of Regulation EU 2016/679 and extract a copy, provided that the rights and freedoms of others are not infringed.
2. **Verifying and rectifying your data.** The data subject has the right to verify the accuracy of his/her data, to update, correct and integrate any inaccurate personal data concerning him/her, without undue delay, under article 16 of Regulation EU 2016/679.
3. **Obtaining erasure (Right to be forgotten).** If the conditions indicated under art. 17 of Regulation EU 2016/679 exist, the data subject shall have the right to request the erasure of his/her data by the data controller.
4. **Obtaining restriction of the processing.** If the conditions indicated under art. 18 of Regulation EU 2016/679 exist, the data subject shall have the right to request the restriction of data processing. In this case, the data controller shall not process the data for any purpose, with the exception of storage or for *“for the establishment, exercise or defence of legal claims or the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State”*.
5. **Obtaining data portability.** The data subject has the right to receive his/her data in a structured, commonly used and machine-readable format and, where technically feasible, have the right to request and transmit those data to another controller without hindrance.
6. **Objecting to data processing.** When the personal data are processed for the purposes of *“the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller”* or *“the processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child”*, the data subject shall have the right to object to the processing on grounds relating to his or her particular situation. The data subject shall also have the right to object to the processing, at any time for direct marketing purposes, without the need to indicate specific reasons.
7. **Lodging a complaint.** If the data subject considers that the processing of personal data relating to him or her infringes Regulation EU 2016/679, *“he/she shall have the right to lodge a complaint with a supervisory authority, in particular in the Member State of his or her habitual residence, place of work or place of the alleged infringement”*.
8. **Objecting to automated decision-making.** The data subject shall have the right to object to the processing of his/her personal data wholly by automated means, including profiling, unless this form of processing is required to complete and/or fulfil the contract, is required by current legislation or carried out following the explicit consent of the data subject, who shall have the right to revoke it at any time.
9. **Revoking consent at any time.** The data subject shall have the right to revoke consent to the data processing at any time. Revocation of consent does NOT, however, affect the lawfulness of the processing based on the consent given before the revocation;

The data subject can exercise his/her rights by writing to the data controller at the address indicated above either by certified email or by letter to the following address gdp@melesi.it, specifying the reason for the request, the right that he/she intends to exercise and attaching a photocopy of his/her identity card which proves the legitimacy of the request.

Data transfer

For all the purposes indicated in this statement, personal data of a common nature related to the data subject will not be disclosed to others.

Automated decision-making processes

The data controller does not process the data of natural persons using automated decision-making processes.

Modifications

This policy is valid from 20/05/2018. OFFICINE AMBROGIO MELESI S.r.l. reserves the right to modify or simply update the content, wholly or in part, also due to variations in the applicable legislation.

OFFICINE AMBROGIO MELESI S.r.l. will inform you as soon as these variations are introduced and they will be binding as soon as they are published on the website.

OFFICINE AMBROGIO MELESI S.r.l. kindly requests, therefore, that you visit this section regularly to find out about the most recent and updated version of the policy to stay updated about the personal data collected and on the use made of it.

¹ For more detailed information on the data subject's rights, please consult Italian Leg Decree 196/2003 “Personal Data Protection Code” and subsequent amendments and Regulation EU 2016/679 “European Regulation on the protection of personal data”.