



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

Largo De Vecchi 11
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Italy

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E-mail: info@melesi.it
Web site: www.melesi.it

Cap.Soc./Share Cap. €500.000 i.v.
P.IVA - C.F. - R.I. Lecco:
IT 00231630138
R.E.A. n. LC-108835
N.Mecc./Export n. LC005895

PRIVACY POLICY WEB SITE

This information is provided to users who access and use this website of the company **OFFICINE AMBROGIO MELESI & C. S.r.l.** pursuant to and for the purposes of Legislative Decree 196/2003 "Code regarding the protection of personal data" and subsequent amendments and additions and articles 13 - 14 of EU Regulation 2016/679 "European Regulation on the protection of personal data" (GDPR) to inform them of the essential elements of the processing carried out.

1. Data Controller and Data Protection Officer (DPO)

The Data Controller is the company **OFFICINE AMBROGIO MELESI & C. S.r.l., with registered office in Cortenova (LC) Largo De Vecchi N. 11, in the person of its pro tempore legal representative.**

The company has appointed the "Data Protection Officer" provided for by the Regulation (so-called DPO).

For all questions relating to the processing of your Personal Data and/or to exercise the rights provided for by the Regulation itself, you can contact the DPO at the following e-mail address: gdpr@melesi.it.

2. Data Processors and Persons in Charge of Processing

The updated list of data processors and persons in charge of data processing is kept at the headquarters of the Data Controller.

3. Brief description of data processing

For the purposes indicated in this policy, the Data Controller will process the personal data that you voluntarily provide to us in communications, such as personal and contact data, as well as the data collected automatically during browsing.

a) Browsing data

The computer systems and software procedures used to operate the Site may 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 data subjects, but by its very nature could, through processing and association with data held, including by third parties, allow users to be identified. This category of data includes IP addresses or the type of device used by users who connect to the Site, the settings and characteristics of the device as well as the related system activities, the URI (Uniform Resource Identifier) addresses of the resources requested, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the operating system and the user's computer environment.

These data are used in order to allow correct navigation, to obtain information to check the correct functioning of the Site, to allow the correct provision of the various functions requested by you and to ascertain any liability in the event of hypothetical computer crimes against the Site or third parties.

Cookies - No computer technology is used on the site for the direct acquisition of personal user identification data or user tracking or profiling systems. In fact, our IT systems do not use any type of persistent cookie, but only statistical tools and technical session cookies for the transmission of personal information, which are not stored after the end of the session. Although OFFICINE AMBROGIO MELESI & C. S.R.L. strives to implement all possible technical measures to disable or neutralize any third-party cookies on its site, sometimes these types of files may still be activated using functions that allow the user to interact with social networks, and the latter may therefore track navigation.

This could be done, for example, by using the sharing functions via Facebook, LinkedIn, Twitter present on the article pages, or by playing Youtube video clips that are embedded on our site.

In this regard, we invite you to always refer to the privacy policies provided by the respective social networks.

With reference to the personal data collected through cookies, we invite you to read our Cookie Policy published on the website.

b) Personal data you provide to us

We collect the data that you voluntarily provide to us, such as personal and contact data (e.g. name, surname, e-mail address, city, profession/qualification, telephone number, contact data) to respond to your requests for information sent by e-mail or communications sent to the addresses entered on the Site (e.g. e-mail) or other channels (e.g. via social networks).

- sending CVs for specific applications and any requests from the interested party (on the dedicated "Work with Us" page);
- browsing data acquired from computer systems and software procedures used to operate the Website (e.g. IP addresses, computer domain name, etc.);
- Cookies.



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4. Purposes and conditions of lawfulness of the processing

Personal data will be processed by the Data Controller to allow navigation on the Site and check its correct functioning, manage and respond to your requests for information or communications, as well as for the purpose of protecting our rights in and out of court.

In relation to the purposes we pursue, the conditions of lawfulness of the processing are: the execution of a contract or pre-contractual measures adopted at your request, and our legitimate interest.

- To allow navigation on the Site and ensure its proper functioning

The condition of lawfulness of the processing is the execution of a contract or pre-contractual measures adopted upon request.

The provision of personal data for this purpose is necessary to allow you to browse the Site and to be able to ensure the proper functioning of the Site.

- To manage and respond to your requests for information received through the e-mail address indicated on the Site or other means of communication

The condition of lawfulness of the processing is the execution of a contract or pre-contractual measures adopted at your request.

You are not obliged to provide your data for the aforementioned purpose, however communication is a necessary requirement in order to be able to follow up on your requests; The consequence of failure to communicate may be the inability to handle your request.

- Manage your spontaneous application received through the dedicated Work with Us section on the website

The condition of lawfulness of the processing is the execution of pre-contractual measures adopted at your request. Please refer to the complete information published in the dedicated Work with Us section.

You are not obliged to communicate your data for the aforementioned purpose, however communication is a necessary requirement in order to be able to follow up on your requests; The consequence, in case of failure to communicate, is the impossibility of following up on your application.

- Exercising or defending a right in or out of court

The condition of lawfulness of the processing is the legitimate interest of the Data Controller to exercise or defend its rights; The Data Controller has considered that this legitimate interest does not prejudice your rights and freedoms.

- Provision of the Service

The processing for this purpose is necessary to allow you to browse the Site. The provision of your Personal Data for this purpose is not mandatory but otherwise it will not be possible to provide you with some or all of the Services.

- Compliance

The processing for this purpose is necessary so that OFFICINE AMBROGIO MELESI & C. S.R.L. can comply with any legal obligations. When you provide us with Personal Data, it will be processed according to the applicable legislation, which may involve its storage and communication to the Authorities for accounting, tax or other obligations.

- Abuse/Fraud

The information collected for this purpose will be used exclusively to protect the rights, property or safety of OFFICINE AMBROGIO MELESI & C. S.R.L., our affiliates, our business partners, employees or customers, for example, in the context of legal proceedings, internal investigations and investigations by competent authorities, as well as to prevent or detect any abuse or fraudulent activity against OFFICINE AMBROGIO MELESI & C. S.R.L.

- Sending any communications / newsletters / in relation to its services and/or initiatives / events also concerning products and services similar to those requested by the data subject (soft spam) subject to the explicit consent of the data subject

Personal data are collected and processed in compliance with the principles of correctness, lawfulness, transparency, data minimization and protection of confidentiality.



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5. Processing methods and data retention time

Your data will be processed with the support of IT and telematic means and are protected through adequate technical and organizational security measures suitable to guarantee their confidentiality, integrity and availability.

We only retain personal data for as long as necessary to achieve the purposes for which it was collected or for any other related legitimate purpose (e.g. allowing you to browse the site). Therefore, if personal data is processed for two different purposes, we will keep such data until the purpose with the longer term ends. However, we will no longer process personal data for the purpose of which the retention period has expired. Personal data that is no longer required, or for which there is no longer a legal basis for its storage, will be irreversibly anonymized (and thus can be stored) or deleted.

Personal Data processed for Compliance purposes will be stored by OFFICINE AMBROGIO MELESI & C. S.R.L. for the period provided for by specific legal obligations or applicable legislation.

The Personal Data processed in order to prevent Abuse/Fraud will be kept by OFFICINE AMBROGIO MELESI & C. S.R.L. for the time strictly necessary for the aforementioned purpose and therefore until the moment in which OFFICINE AMBROGIO MELESI & C. S.R.L. will be required to keep them to protect itself in court and to communicate said data to the competent authorities.

For the purpose of sending communications / newsletters / in relation to its services and/or initiatives / events also concerning products and services similar to those requested by the data subject, consent can always be revoked. Refusal to process data for the aforementioned purpose will prevent the complete performance of the activities of sending communications/newsletters from the Data Controller.

Browsing data are deleted at the end of your browsing session, unless storage is necessary to ascertain any liability in the event of hypothetical computer crimes against the Site or third parties.

The personal data processed to manage and respond to your requests for information or other communications are kept for the time necessary to manage and respond to your request and subsequently deleted.

If it is necessary to process the data for legal protection purposes, it will be stored for as long as any claims can be pursued by law.

6. Recipients and transfer of personal data

The personal data of the data subject may be made available and/or communicated to persons in charge and/or responsible (including external ones) of the processing, in relation to the skills and functions of each of them, in order to satisfy the aforementioned purpose or in compliance with specific regulatory obligations.

By way of example and not limited to, the personal data of the data subjects may be made available and/or communicated to:

- employees of the Data Controller, duly appointed as persons in charge of the processing of personal data, or collaborators and/or consultants of the Data Controller, duly appointed as data processors;
- companies, consultants or professionals who may be in charge of the installation, maintenance, updating and, in general, the management of the Data Controller's hardware and software or which the Data Controller uses for the provision of its products and/or services, even if necessary by appointing them as system administrators;
- companies, consultants or professionals who assist the Data Controller in fulfilling specific legal obligations.

In this regard, the Data Controller specifies that the persons in charge to whom the Users' personal data will be made known will process them by virtue of a specific appointment or assignment, in accordance with the requirements of art. 29 of the Regulation, and that the third parties to whom the personal data will be made available will process them as external data processors on behalf of the Data Controller, on the basis of specific acts of appointment, in accordance with the requirements of art. 28 of the Regulation.

The personal data of the data subjects collected will not be disseminated, made available or given for consultation in any form to subjects other than those indicated in this information notice and/or provided for by current legislation.

The User's personal data will not be transferred outside the European Economic Area; however, in such a case, the Data Controller specifies that the processing will take place according to one of the methods permitted by the legislation on the protection of personal data, such as the adoption of Standard Clauses approved by the European Commission, the selection of subjects adhering to international programs for the free movement of data or operating in countries considered safe by the European Commission, etc. It is possible to receive more information, on request, from the Data Controller at the contacts indicated above.

For any further information on the transfer of your personal data, you can send an email to the following address: info@melesi.it or gdpr@melesi.it.



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7. Rights of the Data Subject

At any time, the Data Subject may exercise his/her rights pursuant to Legislative Decree 196/2003 and subsequent amendments and additions and articles 15 to 22 of EU Regulation 2016/679 by contacting the Data Controller by sending an e-mail to info@melesi.it or by writing to the Data Protection Officer (DPO) at gdpr@melesi.it.

By way of example, you have the right, at any time, to ask where applicable to:

1. **Access your data to confirm whether or not your data is being processed (art. 15 of EU Regulation 2016/679)**
2. **Verify and rectify your data (art. 16 of EU Regulation 2016/679)**
3. **Obtain erasure (Right to be forgotten) (art. 17 of EU Regulation 2016/679)**
4. **Obtain restriction of processing (Art. 18 GDPR)**
5. **Achieve data portability.**
6. **Object to the processing of data.**
7. **Submit a complaint.**
8. **Object to automated decision-making, where it exists.**
9. **Withdraw consent at any time.** The Data Subject may revoke consent to the processing of data at any time. The withdrawal of consent does NOT, however, affect the lawfulness of the processing based on the consent given before the withdrawal;

There is no automated decision-making process.

In any case, the Data Subject has the right to contact the Data Protection Authority whose references are present on the www.garanteprivacy.it website, in the manner specified therein.

Updating and changes to the Privacy Policy

The owner reserves the right to modify, update, add or remove the content of this page from time to time.

The User is therefore invited to periodically consult the information contained herein in order to stay updated with respect to any changes that have occurred since the last consultation.

The Data Controller
OFFICINE AMBROGIO MELESI & C. S.R.L.