

## Privacy Policy

Information notice on the processing of personal data of website users — Arts. 13 and 14 of Regulation (EU) 2016/679 (the "GDPR")

*English courtesy translation. In case of any discrepancy, the original Italian version prevails.*

### Why this notice

AR S.r.l. (also the "Company" or "Data Controller") is committed to respecting and protecting your privacy and wants you to feel secure both when simply browsing the site and if you decide to register by providing your personal data in order to use the services made available to its Users and/or Customers. On this page the Company intends to provide some information on the processing of personal data relating to users who visit or consult the website accessible electronically at the address [www.ar-assemblaggio.com](http://www.ar-assemblaggio.com) (the "Site"). This notice is given only for the Company's website and not for other websites that the user may consult via links (for which reference is made to their respective privacy notices/policies). The reproduction or use of pages, materials and information contained within the Site, by any means and on any medium, is not permitted without the prior written consent of the Company. Copying and/or printing for strictly personal and non-commercial use is permitted (for requests and clarifications, contact the Company at the details indicated below). Other uses of the contents, services and information on this site are not permitted.

With regard to the contents offered and the information provided, the Company will endeavour to keep the contents of the Site reasonably updated and reviewed, without offering any guarantee as to the adequacy, accuracy or completeness of the information provided, expressly disclaiming all liability for any errors or omissions in the information provided on the Site.

### Source — Browsing data

The Company informs you that the personal data you provide and that are acquired together with a request for information and/or contact, registration on the site and use of services via smartphone or any other tool used to access the Internet, as well as the data necessary to provide such services — including browsing data and data used for the possible purchase of the products and services offered by the Company, but also the mere so-called "browsing" data of the site by Users — will be processed in compliance with applicable law. The IT systems and software procedures used to operate this website acquire, in the course of their normal operation, certain personal data whose transmission is implicit in the use of Internet communication protocols. This is information that is not collected to be associated with identified data subjects, but which by its very nature could, through processing and association with data held by third parties, allow users to be identified. This category of data includes the "IP addresses" or domain names of the computers used by users connecting to the site, the URI (Uniform Resource Identifier) addresses of the requested resources, 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 (success, error, etc.) and other parameters relating to the user's operating system and IT environment. These data are used solely to obtain anonymous statistical information on the use of the site and to check that the Company's website is working correctly. Please note that the aforementioned data could be used to ascertain liability in the event of computer crimes against the Company's site or other connected sites: except for this possibility, web contact data do not currently persist for more than a few days.

### Source — Data provided by the user

The Company collects, stores and processes your personal data in order to provide the products and services offered on the Site, or to comply with legal obligations. In relation to certain specific Services, Products, Promotions, etc., the Company may also process your data for commercial purposes. In such cases, specific, separate, optional consent will be requested, which can always be withdrawn using the methods and contact details indicated below.

The optional, explicit and voluntary sending of e-mail to the addresses indicated in the relevant section of the Website, as well as the completion of forms, communication via chat, push notifications via APP, social networks, call centre, etc., entails the subsequent acquisition of some of your personal data, including those collected through the use of Apps and related services, which are necessary to respond to requests. We also point out that, when using a mobile connection to access content and digital services offered directly by the Company or by our Partners, it may be necessary to transfer your personal data to such third parties. We highlight that you may access the Site or connect to areas where you may be able to publish information using blogs or message boards, communicate with others (for example arriving from the Company's page on Facebook®, LinkedIn®, YouTube® and other social networking sites), review products and offers and post comments or content. Before interacting with such areas, we invite you to carefully read the General Terms of Use, bearing in mind that, in certain circumstances, the information published may be viewed by anyone with Internet access and all the information you include in your posts may be read, collected and used by third parties.

### **Purposes of the processing and legal basis**

The data are processed for the following purposes:

- 1 strictly connected and necessary to registration on the site, to the services and/or Apps developed or made available by the Company, to the use of the related information services, to the management of contact or information requests, and to the purchase of products and services offered through the Company's site;
- 2 for ancillary activities connected with managing the User/Customer's requests and sending replies, which may include the transmission of promotional material; for completing the purchase order of the products and services offered, including aspects relating to credit-card payment, shipment management, any exercise of the right of withdrawal provided for distance purchases, and updates on the availability of products and services temporarily unavailable;
- 3 connected with the fulfilment of obligations laid down by EU and national legislation, the protection of public order, and the detection and prosecution of crimes;
- 4 direct marketing, i.e. sending advertising material, direct selling, carrying out market research or commercial communications regarding products and/or services offered by the Company; this activity may also concern products and services of companies in the Company's Group and be carried out by sending advertising/informational/promotional material and/or invitations to participate in initiatives, events and offers aimed at rewarding users/customers, performed by "traditional" methods (e.g. paper mail and/or operator calls) or by "automated" contact systems (e.g. SMS and/or MMS, automated telephone calls, e-mail, fax, interactive applications), pursuant to Art. 130 paras 1 and 2 of Italian Legislative Decree 196/03 as amended.

The provision of data for the purposes referred to in points 1), 2) and 3) — connected to a pre-contractual and/or contractual stage, or functional to a user request or required by a specific legal provision — is mandatory and, failing this, it will not be possible to receive the information and access the services requested. With regard to point 4) of this notice, the user/customer's consent to the processing is instead free and optional and can always be withdrawn without consequences for the usability of the products and services, except that the Company will be unable to keep users/customers updated on new initiatives or particular promotions or benefits that may be available.

The Company may send commercial communications relating to products and/or services similar to those already provided, pursuant to Directive 2002/58/EC, using the e-mail or postal contact details you provided on such occasions, which you may object to using the methods and contact details indicated below.

### **Methods, processing logic, retention periods and security measures**

Processing is also carried out with the aid of electronic or otherwise automated means and is performed by the Company and/or by third parties on which the Company may rely to store, manage and transmit the data. The processing of the data will be carried out using logics for organising and processing your personal data — including data relating to the logs generated by access to and use of the services made available via the web

and of the products and services used — connected with the purposes indicated above and, in any case, in such a way as to guarantee the security and confidentiality of the data. The personal data processed will be retained for the periods provided for by the legislation applicable from time to time.

Still with regard to data security, in the sections of the website set up for particular services, where personal data is requested from the user, the data is encrypted using a security technology called Secure Sockets Layer (SSL). SSL technology encodes information before it is exchanged over the Internet between the user's computer and the Company's central systems, making it incomprehensible to unauthorised parties and thus ensuring the confidentiality of the transmitted information; furthermore, transactions made using electronic payment instruments are carried out directly on the platform of the Payment Service Provider (PSP), and the Company retains only the minimum set of information necessary to handle any disputes. Precisely with reference to personal data protection, the user/customer is invited, pursuant to Art. 33 of the GDPR, to report to the Company any circumstances or events from which a potential "personal data breach" may arise, in order to allow immediate assessment and the adoption of any actions to counter such an event, by sending a communication to [privacy@ar-srl.com](mailto:privacy@ar-srl.com) or contacting Customer Service. The measures adopted by the Company do not exempt the Customer from paying the necessary attention to the use, where required, of passwords/PINs of adequate complexity, which must be updated periodically — especially if the Customer fears they have been breached/known by third parties — as well as keeping them carefully and inaccessible to third parties, in order to avoid improper and unauthorised use.

## Cookies

A cookie is a short string of text that is sent to your browser and, possibly, saved on your computer (or alternatively on your smartphone/tablet or any other tool used to access the Internet); this transmission generally occurs each time you visit a website. The Company uses cookies for various purposes, in order to offer you a fast and secure digital experience — for example, by allowing you to keep your connection to the protected area active while browsing the pages of the site. The cookies stored on your device cannot be used to retrieve any data from your hard disk, transmit computer viruses or identify and use your e-mail address. Each cookie is unique to the browser and device you use to access the Website or use the Company's App. In general, the purpose of cookies is to improve the functioning of the website and the user's experience in using it, although cookies may also be used to send advertising messages (as specified below). For more information on what cookies are and how they work, you can consult the "All about cookies" website at <http://www.allaboutcookies.org>. For detailed information on Cookies, please read the dedicated page.

## Scope of disclosure and transfer of data

In pursuit of the purposes indicated above, the Company may disclose and have processed, in Italy and abroad, the personal data of users/customers to third parties with whom we have relationships, where these third parties provide services at our request. We will provide these third parties only with the information necessary to perform the requested services, taking all measures to protect your personal data. The data may be transferred outside the European Economic Area where this is necessary for the management of your contractual relationship. In such a case, obligations of protection and security equivalent to those guaranteed by the Data Controller will be imposed on the recipients of the data. In the case of services offered directly by Partners, we will provide only the data strictly necessary for their performance. In any case, only the data necessary to pursue the intended purposes will be communicated and, where required, the safeguards applicable to data transfers to third countries will be applied. We may also disclose personal data to our commercial service providers for marketing reasons, appointed for this purpose as external data processors. Furthermore, personal data may be communicated to the competent public bodies and authorities for the purposes of complying with legal obligations or ascertaining liability in the event of computer crimes against the site, and may be communicated to, or located at, third parties (as data processors or, in the case of electronic communication service providers, as independent data controllers) who provide IT and telematic services (e.g. hosting, website management and development) and on whom the Company relies for the performance of tasks and activities — also of a technical and organisational nature — instrumental to the operation of the website. The parties belonging to the above categories operate as separate Data Controllers or as Data Processors appointed for this purpose by the

Company.

Personal data may also be known to the Company's employees/consultants, who are specifically instructed and appointed as persons authorised to process the data. The categories of recipients to whom the data may be communicated are available by contacting the Company at the details indicated below.

## **Rights of data subjects**

You may exercise at any time the rights granted to you by law, including the right:

- a to access your personal data, obtaining evidence of the purposes pursued by the Data Controller, the categories of data involved, the recipients to whom they may be communicated, the applicable retention period, and the existence of automated decision-making;
- b to obtain without delay the rectification of inaccurate personal data concerning you;
- c to obtain, in the cases provided for, the erasure of your data;
- d to obtain the restriction of processing or to object to it, where possible;
- e to request the portability of the data you have provided to the Company, i.e. to receive it in a structured, commonly used and machine-readable format, also in order to transmit such data to another controller, within the limits and constraints set out in Art. 20 of the GDPR.

You may also lodge a complaint with the Italian Data Protection Authority (Garante per la Protezione dei Dati Personali) pursuant to Art. 77 of the GDPR. For the processing referred to in point 4) of the purposes, the Customer may always withdraw consent and exercise the right to object to direct marketing (in both "traditional" and "automated" form). The objection, in the absence of any indication to the contrary, will apply to both traditional and automated communications.

## **Data Controller**

The Data Controller, pursuant to Art. 4 of the GDPR, is AR S.r.l., Via Ippolito Nievo, 19 — 20145 Milano (MI), VAT no.: 11218060157 — Tax code: 11218060157. The rights indicated above may be exercised at the request of the data subject using the methods made known by Customer Service or on the Company's website, or using the following references: Andrea Rossi (privacy@ar-srl.com).

Use of the Website, including versions intended for tablets and/or smartphones, by the Customer and/or User implies full knowledge and acceptance of the content and any indications included in this version of the notice published by the Company at the time the site is accessed. The Company informs you that this notice may be amended without notice and therefore recommends reading it periodically.

### **The Data Controller — AR S.r.l.**

This privacy notice was last updated on 13/11/2018.