

# PRIVACY POLICY

## DATA CONTROLLER

ERA S.r.l. with registered and administrative office in Moncalieri (Turin), Via F. Santi 15, with tax code and VAT number IT07647200018, registered in the Turin Company Register under R.E.A.number 909465 (hereinafter also the "Company");).

## 1 - PURPOSES OF DATA PROCESSING

**1.1 - Contractual purposes:** viewing the website pages and using the services offered on the site [www.eraspares.en](http://www.eraspares.en) (from now on "Website").

**1.2 – Marketing purposes:** sending, with automated (such as sms, mms and email) and traditional (such as phone calls with operators and traditional mail) contact methods, of promotional and commercial communications relating to services/products offered by the Company or reporting of business events, as well as carrying out market research and statistical analysis.

**1.3 – Profiling purposes:** analysis of your preferences, habits, behaviours or interests in order to send you personalised commercial communications.

**1.4 – Legal obligations:** fulfilling obligations stipulated by regulations and applicable national and supranational legislation.

**1.5 - Sending newsletters:** if requested by you by registering for this service.

**1.6 – Rights of the data controller:** if necessary, to ascertain, exercise or defend the rights of the Company in court

**1.7 – Extrajudicial debt recovery:** In order to allow the company to recover its debts without resorting to a court authority.

**1.8 - Website operation:** During their normal operation, the computer systems and software procedures used to operate this Website acquire some personal data whose transmission is implicit in the use of internet communication protocols. This information is not collected with the intent of associating it with identified users but, by its nature, it could lead to the identification of users of the Website through processing and association with data held by the Company or third parties.

## 2 - LEGAL BASIS OF PROCESSING

**2.1 - Contractual purpose:** performance of a contract of which you are a party.

**2.2 - Marketing and profiling purposes:** consent (optional and revocable at any time).

**2.3 – Legal obligations:** need to fulfil legal obligations.

**2.4 - Sending newsletters:** performance of a contract of which you are a party, or signing up to the newsletter.

**2.5 - Rights of the data controller and Extrajudicial debt recovery:** legitimate interest.

## 3 - PERSONAL DATA RETENTION PERIOD

**3.1 - Contractual purposes, Legal obligations and Sending newsletters:** for the entire duration of the contract and, after termination, for 10 years.

**3.2 - Marketing and profiling purposes:** until the withdrawal of consent for this purpose. Only data relating to the details of any purchases made will be retained and processed for the terms set out in the provision of the Personal Data Protection Authority of 24 February 2005 and subsequent amendments, that is 24 months.

**3.3 - Rights of the data controller and Extrajudicial debt recovery:** in case of judicial litigation, for its entire duration, up to the expiration of the terms for appeal.

**3.4 - Website Operation:** for the entire duration of the browsing session on the Website.

Once the above retention terms have expired, your personal data will be destroyed, deleted or made anonymous, compatibly with the technical cancellation and backup procedures.

#### **4.1 - PERSONAL DATA PROCESSED FOR CONTRACTUAL PURPOSES - LEGAL OBLIGATIONS - RIGHTS OF THE DATA CONTROLLER - DEBT RECOVERY**

Personal data, contact details, administrative-accounting data.

#### **4.2 - PERSONAL DATA PROCESSED FOR MARKETING AND PROFILING PURPOSES**

Personal data, contact details, administrative-accounting data, data on purchases made on the Website, data collected from cookies installed by the Website.

#### **4.3 - PERSONAL DATA PROCESSED FOR SENDING NEWSLETTERS AND FOR COMMUNICATIONS**

Contact details (telephone, email).

#### **4.4 - PERSONAL DATA PROCESSED FOR WEBSITE OPERATION**

The IP addresses or domain names of the computers used by users connecting to the Website, 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 (successful, error, etc.), other parameters relating to the operating system and the user's IT environment, information relating to the user's behaviour on the Website, the pages that have been visited or searched for, in order to select and make specific advertisements to the user of the Website and data relating to the browsing behaviour held on the Website using, for example, cookies (for the latter check the specific contents within the Cookie Policy).

### **5 - MANDATORY PROVISION OF DATA**

The provision of personal data referred to in point 4.1 for the purposes referred to in point 1.1 is mandatory. The refusal to provide the aforementioned personal data does not, therefore, allow the possibility to use the services of the Website related to the reservation and sale of products.

The provision of personal data referred to in point 4.2 for the purposes referred to in points 1.2 and 1.3 is optional and subject to your consent.

Some personal data referred to in point 4.4 are strictly necessary for the operation of the Website, only to obtain anonymous statistical information about the use of the Website and to check that it functions correctly; they are deleted immediately after processing. In the processing of personal data that may directly or indirectly identify you, we try to respect the principle of strict necessity. For this reason, we have configured the Website in such a way that the use of personal data is kept to a minimum and in order to limit the processing of personal data that allow you to be identified only in case of need or at the request of the authorities and the Police (such as, for example, data on traffic and the time you spend visiting the Website or your IP address) or for the assessment of liability in the event of supposed cyber crimes against the Website.

### **6 - DATA RECIPIENTS**

The Data may be processed by external parties operating as autonomous controllers such as, for example, authorities and supervisory and control bodies and in general subjects, public or private, entitled to request the Data.

The Data may also be processed, on behalf of the Company, by external parties designated as Processors, who are given appropriate operating instructions. These subjects are essentially included in the following categories:

- a. companies that offer email sending services;
- b. companies that offer Website maintenance and development services;
- c. companies that offer support in carrying out market research.

## **7 - SUBJECTS AUTHORISED TO PROCESS**

Your data may be processed by employees of the Company's corporate functions responsible for the pursuit of the aforementioned purposes, that have been expressly authorised to process and have received adequate operating instructions.

The data referred to in point 4.4 collected during browsing of the Website will be processed by Company employees, collaborators or external subjects, such as persons in charge of the processing and data processors, who carry out technical and organisational tasks on the Website on behalf of the Company.

A complete and updated list of the Data Processors appointed by the Company can be obtained by emailing [Privacy@rhiag-group.com](mailto:Privacy@rhiag-group.com)

## **8 - YOUR RIGHTS AS THE DATA SUBJECT FOR PROCESSING - LODGING A COMPLAINT WITH THE SUPERVISORY AUTHORITY**

By contacting the Company via email at [privacy@rhiag-group.com](mailto:privacy@rhiag-group.com), you may ask the Company to access the data concerning you, their deletion, the correction of inaccurate data, the integration of incomplete data, the limitation of processing in cases provided by Art. 18 of GDPR, as well as the objection to the processing in case of legitimate interest of the Company.

Furthermore, if the data processing is based on consent or contract and is carried out with automated tools, you are entitled to receive your personal data in a structured, commonly used and automatically readable format, as well as, if technically feasible, to transmit them to another controller without impediments.

You have the right to revoke consent at any time for marketing and/or profiling purposes, as well as to object to the processing of data for marketing purposes, including profiling related to direct marketing. You have the right to prefer to be contacted for the aforementioned purpose exclusively through traditional methods, to express your objection only to receive communications through automated methods.

You have the right to lodge a complaint with the competent Supervisory Authority in the Member State in which you normally reside or work or the State in which the alleged violation occurred.

## **9 – DATA SECURITY**

Your personal data will be processed with automated tools for the time strictly necessary to achieve the purposes for which they were collected and in compliance with the principle of necessity and proportionality, avoiding the processing of personal data if the operations can be performed by the use of anonymous data or by other means.

We have adopted specific security measures to prevent the loss of personal data, illicit or incorrect uses and unauthorised access, but please do not forget that it is essential for the security of your data that your device is equipped with tools such as antivirus software that is constantly updated and that the Internet connection provider guarantees the safe transmission of data through firewalls, anti-spam filters and similar controls.