



PRIVACY POLICY FOR THE PROCESSING OF PERSONAL DATA (pursuant to Articles 13 and 14 of EU Regulation No. 2016/679)

Dear user,

The Regulations in force require us to provide information regarding the processing of personal data for this website with reference to the processing of the personal data of the users who consult it and use the relative web services accessible by electronic means through the Site and any services connected to it.

The information is provided, pursuant to EU Regulation 2016/679 (hereinafter also "Regulation" or "G.D.P.R."), to all users who interact with the Site and its services.

The validity of the information contained in this page is limited to the Site only and does not extend to other websites outside the Entity that may be consulted by hyperlink.

For the Regulation on the processing of personal data:

a) We, i.e. **ROTAIR S.P.A.** owner of this Site, are the "Data Controller";

b) You are the "Data Subject".

1. Treatment

1.1. The Data Controller processes the acquired data according to the principles of lawfulness, correctness, transparency, limitation of purpose and storage, data minimization, accuracy, integrity and confidentiality.

1.2. The Data Controller guarantees the security, confidentiality and protection of the personal data in its possession, at any stage of the data processing process.

2. Data Controller

2.1. The Data Controller of data relating to identified or identifiable natural persons who have consulted the above website and social network pages is **ROTAIR S.P.A.** with registered office in **Via Bernezzo 67 – 12023 Caraglio (CN) Italy, VAT code No. 00210890042.**

2.2. The Data Controller can be contacted at **info@rotairspa.com**

3. Categories of data processed

3.1. Browsing data: the computer systems and programs used to operate the site collect some personal data whose transmission is implicit in the use of Internet communication protocols (e.g. IP addresses or domain names of computers used by users connecting to the site, URI -Uniform Resource Identifier- addresses of the resources requested, time of the request, method used to submit the request to the server, size of the file obtained in response, numerical code about the status of the response from the server -good outcome, error, etc.- and other parameters relating to the user's operating system and computer environment. and other parameters relating to the user's operating system and computer environment). Although this information is not collected to be associated with identified interested parties, by its nature it could, through processing and association with data held by third parties, allow users to be identified. These data are processed, for the time strictly necessary in accordance with the law in force, for the sole purpose of obtaining anonymous statistical information on the use of the site and to check its correct operation. It should be noted that the aforementioned data



could be used to ascertain responsibility in the event of computer crimes against the Site or other sites connected or linked to it.

3.2. Cookies: this Application makes use of Cookies. To find out more and read the detailed information, the user can consult the Cookie Policy.

3.3. Data provided voluntarily by the user: for connections through the website, a provision of personal data by the user is required (name, and contact details); this in reference to the compilation of the three dedicated "Contact" forms or to the subscription to the newsletter and commercial communications service by the parent company (ELGI EQUIPMENTS LIMITED) using a specific form that can be filled in by the user. Furthermore, any further contacts with the Data Controller, for example to request information on a specific product or by spontaneously sending messages, by e-mail or traditional mail, to the Data Controller's addresses indicated on the site, entail the subsequent acquisition of such personal data of the sender, necessary to respond to other data entered, as well as any other personal data voluntarily provided by the user in the related communications.

4. Purposes and Legal Bases of the Processing

4.1. The personal data voluntarily provided by the user will be processed for the following purposes:

- a) navigation on the website and use of the relevant services;
- b) respond to a request for information or a commercial request;
- c) perform a service or provision requested;
- d) fulfill any subsequent administrative, financial, accounting obligations to execute or grant execution of contractual obligations undertaken;
- e) to fulfil any obligation required by law and/or an order of the Public Authorities;
- f) if necessary, to assert or defend a right in court;
- g) communicate the data entered voluntarily in the appropriate form (name and e-mail address) in order to receive commercial communications from the parent company ELGI EQUIPMENTS LIMITED;

4.2. The processing of personal data is carried out on the basis of the principle of lawfulness by virtue of the legal bases referred to in Article 6 of the GDPR for one or more of the specific purposes listed above.

5. Methods of Processing

5.1. The Data will be

- a) collected by computer;
- b) recorded in digital format on computers and/or stored in archives;
- c) protected from the risks of destruction, modification, deletion and unauthorized access by means of efficient physical, logical and organizational security measures;
- d) further processed, possibly also in paper form, to the extent and within the time strictly necessary to fulfil the purposes indicated above.

5.2. Within the scope of its activity and for the purposes indicated above, the Data Controller may make use of services provided by third parties who operate on behalf of the Data Controller and according to its instructions, as Data Processors, as indicated in the following point.



6. Communication and Dissemination of Data

6.1. The personal data acquired will not be disseminated, but may be communicated to parties contractually bound to the Data Controller in accordance with and within the limits of the GDPR. The data are communicated only to the extent strictly necessary in relation to the above purposes, or in any case only for the fulfillments necessary for the service, or those required by law or by order of the Authority.

6.2. The categories of recipients are the following

a) subjects necessary for the performance of activities connected with and consequent to the execution of the Service, in their capacity as external data processors (e.g. subjects providing services for the management of the information system used and telecommunications networks, including electronic mail). The list of external data processors is constantly updated and available at the Data Controller's head office;

b) appointees and persons authorized by the Data Controller who are committed to confidentiality or have an adequate legal obligation of confidentiality (e.g. employees and collaborators).

6.3. The Data Controller may also have to disclose the data acquired to comply with legal obligations or to comply with orders from public authorities, including judicial authorities.

7. Period of Data Retention

7.1. The Data Controller keeps the data for the time strictly necessary to achieve the Purposes indicated above.

7.2. The retention period for the data collected with the contact request form is strictly limited to the time necessary to follow up the need that the user is expressing with his request, how the business relationship will evolve as a result of the contacts.

7.3. This data will be deleted when it is no longer necessary for the above-mentioned purposes, without prejudice to further conservation obligations provided for by law.

8. Data transfer

8.1. The Data Controller does not transfer personal data to international organizations. The data may be processed by subjects connected to the Data Controller, by virtue of specific existing constraints, in EU member countries or in non-EU countries. Specifically, any transfers of personal data may take place with India (headquarters of the parent company ELGI EQUIPMENTS LIMITED), for the pursuit of the aforementioned purposes and in compliance with the guarantees provided by the GDPR in the transfer to third countries, by virtue of the Standard Contractual Clauses.

9. Nature of the Data Transfer

9.1. Apart from that specified for navigation data, the provision of personal data by the Data Subject, for the purposes described above, is optional. The Data



Subject, therefore, may refuse to communicate personal data to the Data Controller, since the conferment is optional.

9.2. In case of refusal to communicate personal data it will not be possible to use certain services provided by the site.

10. Rights of the Data Subject

10.1. Pursuant to the G.D.P.R., the data subject may exercise the following rights:

c) Right of access (art. 15): contact the Data Controller directly to access the information in its possession and request its modification;

d) Right to amend (Art. 16): contact the Data Controller directly to have the data amended or rectified;

e) Right to erasure (Art. 17): send the Data Controller a request to have the data concerning him erased;

f) Right to restriction: requesting the Controller to suspend the processing of data, where there are legitimate reasons;

g) Right to portability (Art. 20): if the data subject so requests, the Controller will export his/her data so that they can be transferred to third parties;

h) Right to object (art. 20, 21): unsubscribe, at any time, from all specific uses that the Controller makes of the data (any newsletters, automatic emails, etc.).

10.2. In order to assert their rights, the Data Subject may contact the Data Controller specifying the subject of their request, the right they intend to exercise and attaching a photocopy of an identity document certifying the legitimacy of the request to the following address: ROTAIR S.P.A. - Via Bernezzo 67 – 12023 Caraglio (CN) Italy- or by sending an e-mail to the following address: info@rotairspa.com

11. Automated decision-making processes

11.1. The Data Controller does not carry out processing that consists of automated decision-making processes on the data and there is no profiling system.

12. Amendments to this policy

12.1. The Data Controller reserves the right to modify the content of this information, in whole or in part, also due to changes in the Privacy legislation.

12.2. The Data Controller will publish the updated version of this document on the Site, and from that moment it will be binding: the Data Subject is therefore invited to visit this section regularly.