

Website Privacy Policy

Alloys Italia s.r.l., with registered offices at via degli Schiavetti, 9 34074 Monfalcone (“Alloys Italia”), is committed to protecting the online privacy of the users of this website (“**Website**”). As such, this Privacy Policy has been written in order to allow you to understand Alloys Italia’s policy regarding your privacy, as well as how your personal information will be handled when using the Website. This Privacy Policy will also provide you with information so that you are able to consent to the processing of your personal data in an explicit and informed manner, where appropriate.

In general, any information and data which you provide to Alloys Italia over the Website, or which is otherwise gathered via the Website by Alloys Italia, in the context of the use of Alloys Italia’s services (“**Services**”) as better defined in Section 3 below, will be processed by Alloys Italia in a lawful, fair and transparent manner. To this end, and as further described below, Alloys Italia takes into consideration internationally recognised principles governing the processing of personal data, such as purpose limitation, storage limitation, data minimisation, data quality and confidentiality.

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1. **Data controller and Data Protection Officer**

Alloys Italia, as identified at the top of this Privacy Policy, is the data controller regarding all personal data processing carried out through the Website.

To get in touch with Alloys Italia’s Data Protection Officer, please contact: dpo@sapio.it.

2. **Personal Data processed**

When you use the Website, Alloys Italia will collect and process information regarding you (as an individual) which allows you to be identified either by itself, or together with other information which has been collected. Alloys Italia may also be able to collect and process information regarding other persons in this same manner, if you choose to provide it to Alloys Italia

This information may be classified as “**Personal Data**” and can be collected by Alloys Italia both when you choose to provide it (e.g., when you subscribe to the newsletter or request other

Services provided by Alloys Italia over the Website) or simply by analysing your behaviour on the Website.

Personal Data which can be processed by Alloys Italia through the Website are as follows:

a. Name, contact details and other Personal Data

In various sections of the Website - including, in particular, if you decide to create an account on the Website - you will be asked to submit information about yourself, such as your name, phone / mobile numbers, e-mail address, date of birth, country of residence and address. Additionally, when subscribing or signing up to receive Services, you might be asked to provide information as to your preferred mode of payment - PayPal, bank transfer or credit card.

In addition, whenever you participate in surveys and other promotions which may be available on the Website, as well as whenever you communicate with Alloys Italia through the contact details provided in the Website or with Customer Service, Alloys Italia may collect additional information which you choose to provide.

b. Other persons' Personal Data

As mentioned in the previous section, certain areas of the Website include free text fields where you can write messages to Alloys Italia, or otherwise allow you to post various types of content on the Website. These messages and content may (inadvertently or not) include Personal Data related to other persons.

In any situation where you decide to share Personal Data related to other persons, you will be considered as an independent data controller regarding that Personal Data and must assume all inherent legal obligations and responsibilities. This means, among other things, that you must fully indemnify Alloys Italia against any complaints, claims or demands for compensation for damages which may arise from the processing of this Personal Data, brought by the third parties whose information you provide through the Website.

As Alloys Italia does not collect this information directly from these third parties (but rather collects them, indirectly, from you), you must make sure that you have these third parties' consent before providing any information regarding them to Alloys Italia; if not, then you must make sure there is some other appropriate grounds on which you can rely to lawfully give Alloys Italia this information.

c. Browsing data

The Website's operation, as is standard with any websites on the Internet, involves the use of computer systems and software procedures, which collect information about the Website's users as part of their routine operation. While Alloys Italia does not collect this information in order to link it to specific users, it is still possible to identify those users either directly via that information, or by using other information collected - as such, this information must also be considered Personal Data.

This information includes several parameters related to your operating system and IT environment, including your IP address, location (country), the domain names of your computer, the URI (Uniform Resource Identifier) addresses of resources you request on the Website, the time of requests made, the method used to submit requests to the server, the dimensions of the file obtained in response to a request, the numerical code indicating the status of the response sent by the server (successful, error, etc.), and so on.

These data are used to compile statistical information on the use of the Website, as well as to ensure its correct operation and identify any faults and/or abuse of the Website. Save for this last purpose, these data are not kept for more than 7 business days.

d. Cookies

- *Definitions, characteristics, and application of standards*

Cookies are small text files that may be sent to and registered on your computer by the websites you visit, to then be re-sent to those same sites when you visit them again. It is thanks to these cookies that those websites can “remember” your actions and preferences (e.g., login data, language, font size, other display settings, etc.), so that you do not need to configure them again when you next visit the website, or when you change pages within a website.

Cookies are used for electronic authentication, monitoring of sessions and storage of information regarding your activities when accessing a website. They may also contain a unique ID code which allows tracking of your browsing activities within a website, for statistical or advertising purposes. Some operations within a website may not be able to be performed without the use of cookies which, in certain cases, are technically necessary for operation of the website.

When browsing a website, you may also receive cookies from websites or web servers other than the website being visited (i.e., “**third-party cookies**”).

There are various types of cookies, depending on their characteristics and functions, which may be stored on your computer for different periods of time: “**session cookies**”, which are automatically deleted when you close your browser, and “**persistent cookies**”, which will remain on your device until their pre-set expiration period passes.

According to the law which may be applicable to you, your consent may not always be necessary for cookies to be used on a website. In particular, “**technical cookies**” - i.e. cookies which are only used to send messages through an electronic communications network, or which are needed to provide services you request - typically do not require this consent. This includes browsing or session cookies (used to allow users to login) and function cookies (used to remember choices made by a user when accessing the website, such as language or products selected for purchase).

On the other hand, “**profiling cookies**” - i.e., cookies used to create profiles on users and to send advertising messages in line with the preferences revealed by users while browsing websites - typically require specific consent from users, although this may vary according to the applicable law.

- Types of cookies used by the Website

The Website uses the following types of cookies:

- **Browsing or session cookies**, which are strictly necessary for the Website’s operation, and/or to allow you to use the Website’s content and Services.
- **Analytics cookies**, which allow Alloys Italia to understand how users make use of the Website, and to track traffic to and from the Website.
- **Function cookies**, which are used to activate specific Website functions and to configure the Website according to your choices (e.g., language), in order to improve your experience.
- **Profiling cookies**, which are used to observe the preferences you reveal through your use of the Website and to send you advertising messages in line with those preferences.

Alloys Italia also uses **third-party cookies** - i.e. cookies from websites / web servers other than the Website, owned by third parties. These third parties will either act as independent data controllers from Alloys Italia regarding their own cookies (using the data they collect for their own purposes and under terms defined by them) or as data processors for Alloys Italia (processing personal data on Alloys Italia’s behalf). For further information on how these third parties may use your information, please refer to their privacy policies:

- **Sitefinity**: <https://www.sitefinity.com/privacy-policy>
- **Google**
 - <https://www.google.com/policies/privacy/partners/>
 - <https://tools.google.com/dlpage/gaoptout>

- **Insider:** <http://useinsider.com/privacy-policy/>

- *Cookies present on the Website*

In detail, the cookies present on the Website are as follows:

Technical name	Data Controller	Cookie type, function and purpose	Duration
ALLOYS ITALIA	jsessionid	cookie.	Until the end of browser

- *Cookie settings*

You can block or delete cookies used on the Website via your browser options. Your cookie preferences will be reset if different browsers are used to access the Website. For more information on how to set the preferences for cookies via your browser, please refer to the following instructions:

- [Internet Explorer](#)
- [Firefox](#)
- [Chrome](#)
- [Safari](#)

You may also provide set your preferences on third-party cookies by using online platforms such as [AdChoice](#).

CAUTION: If you block or delete **technical** and/or **function cookies** used by the Website, the Website may become impossible to browse, certain services or functions of the Website may become unavailable or other malfunctions may occur. In this case, you may have to modify or manually enter some information or preferences every time you visit the Website.

Alloys Italia uses Google Analytics on the Website. This is a tool developed by Google and used to collect information, which permits evaluation of the use of the Website, analysis of your behaviour and improvement of your experience with the Website. You can obtain more information about how to opt out of Google Analytics at: <https://tools.google.com/dlpage/gaoptout>.

3. Purposes of processing

Alloys Italia intends to use your Personal Data, collected through the Website, for the following purposes:

- To verify your identity and assist you, in case you lose or forget your login / password details for any of Alloys Italia’s registration services, to allow you to create and maintain a registered user profile, to send you newsletters you have subscribed to as a service (containing only informative content), to finalise purchase orders and deliver products bought on the Websites and to provide any other Services which you may request (“**Service Provision**”);
- To examine applicant’s resumes / CVs and to get in contact with applicants who have submitted their application via the Website (“**Recruitment**”);

- For future marketing, promotional and publicity purposes, including to carry out direct marketing, market research and surveys, via e-mail, SMS, over the phone, through push notifications / pop-up banners, instant messaging, through an operator, through Alloys Italia's official social media pages, [...], regarding Alloys Italia's products and services, as well as those of selected third parties ("**Marketing**");
- For future marketing, promotional and publicity purposes, by sending you direct e-mail marketing communication regarding products and services provided by Alloys Italia and which are identical or similar to those you have previously purchased or requested via the Website ("**Soft Spam**");
- To create a profile of you as a Website user, through the use of profiling cookies and by collecting and analysing information on the preferences you select and choices you make in the Website, as well as your general activities on the Website. This profile will be used to give you information about other websites / services which Alloys Italia believes you may be interested in, and to show you information and advertisements which may be relevant to you and your interests. All algorithms involved in this processing are regularly tested, to ensure the processing's fairness and control for bias ("**Profiling**");
- For compliance with laws which impose upon Alloys Italia the collection and/or further processing of certain kinds of Personal Data ("**Compliance**");
- To prevent and detect any misuse of the Website, or any fraudulent activities carried out through the Website ("**Misuse/Fraud**").

4. Grounds for processing and mandatory / discretionary nature of processing

Alloys Italia's legal bases to process your Personal Data, according to the purposes identified in Section 3, are as follows:

- **Service Provision:** processing for these purposes is necessary to provide the Services and, therefore, is necessary for the performance of a contract with you. It is not mandatory for you to give Alloys Italia your Personal Data for these purposes; however, if you do not, Alloys Italia will not be able to provide any Services to you.
- **Marketing:** processing for these purposes is based on your consent. It is not mandatory for you to give consent to Alloys Italia for use of your Personal Data for these purposes, and you will suffer no consequence if you choose not to give it (aside from not being able to receive further marketing communications from Alloys Italia). Any consent given may also be withdrawn at a later stage (please see [Section 8](#) for more information).
- **Compliance:** processing for this purpose is necessary for Alloys Italia to comply with its legal obligations. When you provide any Personal Data to Alloys Italia, Alloys Italia must process it in accordance with the laws applicable to it, which may include retaining and reporting your Personal Data to official authorities for compliance with tax, customs or other legal obligations.
- **Misuse/Fraud:** Information collected for this purpose is used exclusively to prevent and detect fraudulent activities or misuse of the Website (for potentially criminal purposes).

5. Recipients of Personal Data

Your Personal Data may be shared with the following list of persons / entities ("**Recipients**"):

- Persons, companies or professional firms providing Alloys Italia with advice and consultancy regarding accounting, administrative, legal, tax, financial and debt collection matters related to the provision of the Services and which act typically as data processors on behalf of Alloys Italia;
- Entities engaged in order to provide the Services (e.g., hosting providers or e-mail platform providers);

- Persons authorised to perform technical maintenance (including maintenance of network equipment and electronic communications networks);
- Persons authorised by Alloys Italia to process Personal Data needed to carry out activities strictly related to the provision of the Services, who have undertaken an obligation of confidentiality or are subject to an appropriate legal obligation of confidentiality (e.g., employees of Alloys Italia);
- Other companies within the Alloys Italia Group for internal administrative purposes, including the processing of clients' or employees' Personal Data; and
- Public entities, bodies or authorities to whom your Personal Data may be disclosed, in accordance with the applicable law or binding orders of those entities, bodies or authorities;

6. Transfers of Personal Data

Considering Alloys Italia's worldwide presence and business operations, your Personal Data may be transferred to Recipients located in several different countries. Alloys Italia implements appropriate safeguards to ensure the lawfulness and security of these Personal Data transfers, such as by relying on adequacy decisions from the European Commission, standard data protection clauses adopted by the European Commission, or other safeguards or conditions considered adequate to the transfer at hand.

More information on these transfers is available upon written request to Alloys Italia at the following address: dpo@sapio.it.

7. Retention of Personal Data

Personal Data processed for **Service Provision** will be kept by Alloys Italia for the period deemed strictly necessary to fulfil such purposes - in any case, as these Personal Data are processed for the provision of the Services, Alloys Italia may continue to store this Personal Data for a longer period, as may be necessary to protect Alloys Italia's interests related to potential liability related to the provision of the Services.

Personal Data processed for **Recruitment** will be kept by Alloys Italia for as long as the vacancy for which the CV was submitted is still available or, in case of open positions, for up to 1 year. Alloys Italia may contact applicants before the expiration of this period, in order to request an extension of the retention period.

Personal Data processed for **Marketing** and **Profiling** will be kept by Alloys Italia from the moment you give consent until it is withdrawn. Where it is not withdrawn, consent will be renewed at fixed intervals. Once consent is withdrawn (or not given, following a renewal), Personal Data will no longer be used for these purposes, although it may still be kept by Alloys Italia, in particular as may be necessary to protect Alloys Italia's interests related to potential liability related to this processing.

Personal Data processed for **Compliance** will be kept by Alloys Italia for the period required by the specific legal obligation or by the applicable law.

Personal Data processed for preventing **Misuse/Fraud** will be kept by Alloys Italia for as long as deemed strictly necessary to fulfil the purposes for which it was collected.

8. Data subjects' rights

As a data subject, are entitled to exercise the following rights before Alloys Italia, at any time:

- Access your Personal Data being processed by Alloys Italia (and/or a copy of that Personal Data), as well as information on the processing of your Personal Data;
- Correct or update your Personal Data processed by Alloys Italia, where it may be inaccurate or incomplete;

- Request erasure of your Personal Data being processed by Alloys Italia, where you feel that the processing is unnecessary or otherwise unlawful;
- Request the restriction of the processing of your Personal Data, where you feel that the Personal Data processed is inaccurate, unnecessary or unlawfully processed, or where you have objected to the processing;
- Exercise your right to portability: the right to obtain a copy of your Personal Data provided to Alloys Italia, in a structured, commonly used and machine-readable format, as well as the transmission of that Personal Data to another data controller;
- Object to the processing of your Personal Data, based on relevant grounds related to your particular situation, which you believe must prevent Alloys Italia from processing your Personal Data; or
- Withdraw your consent to processing (for **Marketing** and **Profiling**).

Please note that most of the Personal Data you provide to Alloys Italia can be changed at any time, including your e-mail preferences, by accessing, where applicable, your user profile created on the Website.

When requesting Services via the Website, you may have selected one or more means of communication via which Personal Data processing for **Marketing** purposes may be carried out (e.g., phone, SMS, email, mail, social media). You may withdraw your consent to this processing for all selected means of communication, or you can choose to block specific means only (e.g., if you only withdraw consent for SMS marketing communications, you will not receive further communications via SMS, but may continue to receive them via e-mail), by means of your user profile created on the Website, where applicable.

You can also withdraw consent for **Marketing** (for communications received via e-mail) or object to **Soft Spam** by selecting the appropriate link included at the bottom of every marketing e-mail message received. The same applies to the Alloys Italia newsletter which you may have subscribed to and receive as a Service.

Consent for **Profiling** carried out by cookies may be withdrawn as described in Section 2(f). Where consent for **Profiling** was given via a specific tick box, you may withdraw this consent by changing your preferences, at any time, within your user profile created on the Website, where applicable.

Aside from the above means, you can always exercise your rights described above by sending a written request to Alloys Italia at the following address: dpo@sapio.it.

In any case, please note that, as a data subject, you are entitled to file a complaint with the competent supervisory authorities for the protection of Personal Data, if you believe that the processing of your Personal Data carried out through the Website is unlawful.

9. Amendments

This Privacy Policy entered into force on 25/05/2018.

Alloys Italia reserves the right to partly or fully amend this Privacy Policy, or simply to update its content, e.g., as a result of changes in applicable law. Alloys Italia will inform you of such changes as soon as they are introduced, and they will be binding as soon as they are published on the Website. Alloys Italia therefore invites you to regularly visit this Privacy Policy in order to acquaint yourself with the latest, updated version of the Privacy Policy, so that you may remain constantly informed on how Alloys Italia collects and uses Personal Data.