

## WEBSITE'S PRIVACY POLICY

### WEBSITE'S PRIVACY POLICY FOR [WWW.NORD-COM.IT](http://www.nord-com.it)

This page describes how to manage the site in reference to processing of personal data of users who consult it and use its services.

This reporting is also provided pursuant to art. 13 of the EU Regulation 2016/679 to those who interact with the web services offered by NordCom S.p.A., electronically accessible from the address:

<http://www.nord-com.it/>

The reporting is provided only for the site referred to and not for other websites potentially consulted by the user through links.

The reporting is also based on the Recommendation n. 2/2001 that the European authorities for the protection of personal data, gathered in the Group established by art. 29 of the directive n. 95/46 / EC, adopted on 17 May 2001 to identify some minimum requirements for the online collection of personal data, and, in particular, the methods, times and nature of the information that the data controllers must provide to users when these connect to web pages, regardless of the purpose of the link.

### THE "HOLDER" OF THE TREATMENT

Following consultation of this site, data relating to people identified or identifiable can be processed.

The "Owner" of their processing is NordCom S.p.A.

The data controller has identified his Personal Data Protection Manager that can be contacted at the address [dpo@nord-com.it](mailto:dpo@nord-com.it) or writing to the contacts of the company and specifying "to the attention of the Responsible of data protection".

### DATA PROCESSING PLACE

The treatments connected to the web services of this site take place at the headquarters of NordCom S.p.A. and are processed only by technical personnel in charge of processing.

### TYPES OF DATA PROCESSED

- Navigation data –



Computer systems and software procedures used to operate this site web 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 interests, but which by their very nature could, through elaborations and associations with data held by third parties, allow users to be identified.

This category of data includes IP addresses or computer domain names used by users who connect to the site, addresses in URI notation (Uniform Resource Identifier) of the requested resources, the time of the request, the method used in submitting the request to the server, the size of the file obtained in response, the numeric code indicating the status of the response given by the server (success, error, etc.) and other parameters related to the operating system and the user's computer environment.

These data are used for the sole purpose of obtaining anonymous statistical information on the use of the site and to check its correct functioning and are deleted immediately after processing. Data could be used for the ascertainment of responsibility in case of hypothetical computer crimes against the site: except for this eventuality, data on web contacts do not currently persist for more than seven days.

**- Data provided voluntarily by the user –**

Optional, explicit and voluntary sending of personal data by the user in the registration forms on this site involves the subsequent acquisition of data provided by the sender, necessary for the fruition of the requested service. Specific summary information will be progressively reported or displayed on the pages of the site prepared for particular services on request.

## **COOKIES**

Cookies are small text files that are stored on the user's computer by sites that he/she visits. They are used in order to make websites work and allow them to operate more efficiently, as well as providing information to the owners of the site itself.

**- Google Analytics cookies (\_utma, \_utmz, \_gat, \_ga, \_gid) –**

Google Analytics is a web analytics tool that allows the owner of a site to understand how visitors interact with it. Google Analytics uses proprietary cookies to monitor visitor interactions related to the site that benefits from its features. These cookies are used for storing information, such as the time at which the current visit occurred, any previous visits to the site by the same visitor and the site that has reported the web page to the visitor. The Google Analytics tool collects the information anonymously and records website trends without identifying individual visitors. Browsers do not share cookies that are proprietary to the Google Analytics between various domains. The privacy policies of Google Analytics describe the way in which personal information is processed at the time



when this tool is used. They can be consulted at: <http://www.google.com/intl/it/analytics/privacyoverview.html>

#### **- Using the visitor's IP address through Google's Cookies -**

Each computer and device connected to the Internet is assigned an exclusive number as an Internet protocol (IP) address. Because these numbers are generally assigned to clusters based on the country, an IP address can often be used to identify the country, the province and the city from which a computer connects to the internet. Google Analytics collects the IP address of the visitors on the website to provide an indication about their geographical location. This method is known as IP geolocation. Google Analytics does not report information about the IP addresses of visitors. Due to the use of a method known as IP masking, Google Analytics communicates information so that only one part of the IP address is used for geolocation, rather than the whole address.

#### **- Additional browser component for deactivation of Google Analytics' cookies –**

At the address <https://tools.google.com/dlpage/gaoptout?hl=it> it is possible to download the browser's add-on for the deactivation of Google Analytics. The add-on communicates to Google Analytics' JavaScript (ga.js) to indicate that information about visiting the website should not be sent to Google Analytics. The browser add-on for the deactivation of Google Analytics does not prevent information from being sent to the website itself. Furthermore, most browsers allow some control over most cookies through the settings of the browser itself. If the user does not wish to receive any kind of cookies on his/her computer, it is possible to raise the level of privacy protection of the browser using the appropriate function.

### **OPTIONALITY OF DATA SUPPLY**

Apart from what specified for navigation data, the user is free to provide personal data reported in the application forms or indicated in contacts to solicit sending of informative material or other communications. Their failed to conferment may render impossible to obtain what has been requested.

### **METHOD OF TREATMENT**

Personal data are processed with automated tools for the strictly necessary time to achieve the purposes for which they were collected. Specific security measures are observed to prevent data loss, illicit or incorrect use and unauthorized access. NordCom S.p.A has undertaken all minimum-security measures required by law. Inspired by the main international standards, NordCom S.p.A has also taken additional security measures to minimize risks related to the confidentiality, availability and integrity of personal data collected and treated.

### **SHARING, COMMUNICATION AND DISSEMINATION OF DATA**



The collected data may be transferred or communicated for closely related and instrumental activities to the operation of the service, such as the management of the information system, or for treatments carried out by the other companies for the same purposes.

The personal data provided by users are used to perform the service or the requested performance as well as for advertising or promotions and they are communicated to third parties only if this is necessary for the supply of the services requested.

Apart from these cases, the data will not be communicated or granted to anyone except contractual provision or authorization by the subjects. In this sense, personal data could be transmitted to third parties, but only and exclusively if:

1. there is explicit consent to share data with third parties;
2. there is a need to share information with third parties in order to provide the requested service;
3. it is necessary in order to comply with requests from the Judicial or Public Safety Authorities.

No data deriving from the web service is distributed.

## **RIGHTS OF THE INTERESTED**

The subjects to whom the personal data refer have the right to ask the controller of the processing access to personal data and the correction or cancellation thereof or the limitation of processing that concern him or to object to their treatment, in addition to the right to data portability; they also have the right to lodge a complaint with an authority control.

## **CHANGES TO THESE PRIVACY POLICIES**

NordCom S.p.A periodically checks its privacy and security policies and, where appropriate, review them in relation to regulatory, organizational or other changes dictated by technological evolution. In case of policy changes, the new version will be published on this page of the site.

## **QUESTIONS, COMPLAINTS AND SUGGESTIONS**

Anyone interested in more information, contributing with their own suggestions or advocate claims or disputes regarding the privacy policies of the company or the way the data are processed can write to [privacy@nord-com.it](mailto:privacy@nord-com.it).