

# PRIVACY POLICY WEB SITE

**WWW.NORD-COM.IT**

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

This is a privacy policy provided pursuant to sect. 13 of EU Regulation 2016/679 to those who browse with the web services offered by NordCom S.p.A., accessible electronically from the address:  
<http://www.nord-com.it/>

This privacy policy is provided only for the site said above and not for other websites that may be consulted by the user via links.

## DATA CONTROLLER

Interacting with this website may entail the processing of personal data concerning identified or identifiable persons (hereinafter also referred to as "Data"). The Controller of such data is NordCom S.p.A.

The Company appointed a Data Protection Officer, who may be contacted at the following email address [dpo@nord-com.it](mailto:dpo@nord-com.it) or writing to the company contacts and specifying "for the kind attention of Data Protection Officer".

## TYPES OF DATA PROCESSED

-Browsing data-

The computer systems and software procedures used for the running of this website acquire, over the course of their normal operation, certain data which transmission is implicit to the use of Internet communication protocols.

This information is not collected to be associated to identified data subjects; however, the nature of said data might, through processing and associations with data held by third parties, allow the identification of users.

This category of data includes the following: IP addresses of the devices used by users; date and time in which the request is received; the URI/URL (Uniform Resource Identifier/Locator) addresses of the resources to which the request applies; the numeric code that indicates the status of the response provided by the server (successful, error, etc.); the response size expressed in bytes; the URI/URL address of the referrer page; browser detection string (user agent).

These data shall not be retained for more than 7 days. These data may be used to establish liability in the event of possible cyber-crimes against the website. Except for the above case, data are anonymised to obtain aggregate statistical information on website use and to ensure that the website runs properly and are erased immediately after processing.

- Data Provided by Users on a Voluntary Basis -

The optional, express, and voluntary sending of messages using the relative contact details, and the filling in and submission of the forms published on the website entail the acquisition of the sender's contact details, required respond to requests, and all the personal data included in said communications.

Specific privacy policies are published in the pages dedicated to specific services.

## **COOKIES**

Cookies are small text files containing a certain amount of information exchanged between a website and the user's device (usually their browser). They are primarily used for the purpose of allowing websites to run and to optimise their performance, and provide information to the owners of the website.

### **Google Analytics 4 cookies**

Google Analytics is a web analytics tool that allows the owner of a site to understand how visitors interact with it. The Google Analytics tool does not record or store IP addresses. The Google Analytics privacy policy describes how personal information is treated when this tool is used. Google Analytics notice can be consulted at: <https://support.google.com/analytics/answer/2763052?hl=it>

- Browser add-on for deactivating Google Analytics cookies -

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

## **LEGAL BASIS FOR PROCESSING AND OPTIONAL PROVISION OF PERSONAL DATA**

The legal basis that legitimates data processing is to be identified, for browsing data, in necessity to put in place technical processes aimed solely at carrying out the transmission of a communication over an electronic communication network explicitly requested by the user. The legal basis that legitimates processing is to be identified, for cookies, in the consent of the user or in the use of one of provision stated in sect. 122 of Legislative Decree 30 June 2003 n. 196 and Article 5.3 of Directive 2002/58 / EC. Apart from what is specified for browsing data, the user is free to provide personal data contained in the application forms or otherwise indicated in contacts to request the sending of informative material or other communications. deny to provide them may make it impossible to obtain what is requested.

## **METHODS OF PROCESSING**

The processing of personal data shall also include the use of automated means.

Specific security measures are implemented to prevent the loss of data, their illegal or improper use, and any unauthorised accesses to data. The Data Controller has adopted all the appropriate security measures as established by law and drawing on international standards; furthermore, the Data Controller has adopted additional security measures to minimise the risks concerning the confidentiality, availability, and integrity of the personal data collected and processed.

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

The collected data may be transferred or disclosed for activities that are strictly connected and instrumental to the operation of the service to users.

The data provided by users who submit requests to receive information material (are used for the sole purposes of carrying out the service or task required and are disclosed to third parties only when this is necessary to such end.

Apart from the foregoing cases, the personal data shall not be disclosed unless expressly established by contract or law, or unless the data subject grants their specific consent thereto. To this effect, the data may be disclosed to third parties, but only and exclusively if

1. express consent to disclosing data with third parties is granted;
2. there is a necessity to share said information with third parties for the purpose of providing the service requested;
3. disclosing data is necessary to comply with requests of the Judicial or Public Security Authorities.

The data collected through the Website shall not be disseminated.

### **RIGHTS OF DATA SUBJECTS**

The personal data protection regulation expressly affords certain rights to the persons whose personal data is collected and processed. Specifically, each data subject has the right to obtain confirmation as to whether or not personal data concerning him or her are being processed; to obtain information concerning the source of such data and the purposes and methods of processing; to have the data concerning him or her updated, rectified, supplemented, and erased; to request the portability of the data concerning him or her, and to lodge a complaint with the supervisory authority.

### **CHANGES TO THESE PRIVACY POLICIES**

NordCom S.p.A regularly checks its privacy and security policies, and, where required, shall review said policies based on legislative change, changes to its organisation, or technological developments. In case of changes to these policies, the new version shall be published on this page of the Website

### **REQUESTS, COMPLAINTS, SUGGESTIONS**

Anyone who wishes to receive additional information, contribute through their suggestions, or lodge complaints or grievances with respect to the privacy policies, the manner in which personal data are processed can contact the Data Controller at [privacy@nord-com.it](mailto:privacy@nord-com.it)