



# Privacy Policy

This Information Notice (or "Privacy Policy") is issued pursuant to EU Regulation 2016/679 (known as the "GDPR") concerning the protection of individuals with regard to the processing of personal data of users who access the site [www.trasmaspa.com](http://www.trasmaspa.com).

We inform you that the processing of your personal data will be based on the principles of correctness, lawfulness, transparency and protection of your privacy and your rights. Your personal data will be processed in accordance with the provisions of the aforementioned regulation, the GDPR, and with the privacy obligations prescribed therein.

This Privacy Policy aims to describe, in a way that is simple and transparent to users, which personal data is processed, for what purpose, by whom, with which methods and to inform them about the measures that are applied to protect their rights and their freedoms. This is an Information Notice, pursuant to Art. 13 of the GDPR, valid exclusively for the site [www.trasmaspa.com](http://www.trasmaspa.com) and does not cover other websites that may be reached via links on our pages.

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## **1. DATA CONTROLLER**

1. The Data Controller is the TRA.SMA S.P.A. Company, with its registered office in Via Rigolfo, 60 10024 Moncalieri (TO) ITALY, VAT No. 6753970018, telephone. +39 011 6894811, email [trasmasp@trasmasp.com](mailto:trasmasp@trasmasp.com).

## **2. Purposes of processing and legal basis**

1. The Data Controller, in order to allow the registration of the Data Subject on its Internet site, where it is possible to register, and/or to send requests for information using the contact forms and/or registration for the newsletter service, needs to collect some personal data, as required in the registration form on the website and within the contact form of the site.

The personal data provided by the Data Subject through the website is collected and processed for the following purposes:

- A) To allow you to register in the reserved area of the site and access specific contents such as, for example, product catalogues.
- B) To process requests transmitted through the "Contact form" of the site and provide a reply to the explicit request for contact by the Data Subject.
- C) To implement the newsletter service.

The legal basis that legitimises the processing referred to in paragraphs A), B) and C) is the free, specific, informed, unequivocal consent to the processing that you express.

2. The Data Controller, if it intends to further process the data supplied by you for a purpose other than that for which it was collected, will inform you and provide you with any further relevant information.

## **3. Provision of personal data**

1. The provision of personal data is optional for the purposes referred to in Section 2, paragraph 1 and it will therefore be possible to consult the website without providing any data; however, it is specified that failure to provide it for purposes referred to in paragraph 2A) will make it impossible for the Data Controller to process the request for access to the reserved area of the site; with respect to the purposes referred to in paragraph 2B). Any refusal will make it impossible for the Data Controller to process the data of the Data Subject and to process the request for contact; with respect to the purposes referred to in paragraph 2C) the provision of data is aimed at circulating the newsletter and any refusal will just result in the inability to benefit from this service, without further consequences.

## **4. Data processing methods**

1. Personal data is processed in a lawful and correct manner and used only for the purposes indicated in Section 2. The processing will take place using appropriate applications to ensure the security and confidentiality of personal data and will be kept for the time prescribed by law and, in any case, for the time strictly necessary to implement the activities for which they were collected.

## **5. To whom the data can be communicated**

The data is processed by the Data Controller and by authorised persons under the responsibility of the Data Controller for the purposes indicated above and is only handled by internal and/or external personnel expressly appointed to carry out the processing. If necessary, the data may be communicated to technological partners and agents that the Data Controller makes use of to supply the services requested by users, always respecting the purposes indicated in paragraph 2. To this end, the persons and entities who will have access to the personal data will be specifically authorised for processing by the Data Controller and, where appropriate, appointed as Data Processors, pursuant to Art. 28 of the GDPR or appointed a joint data controllers pursuant to Art. 26 of the Regulation.

A list of the persons and entities to whom the Data Controller communicates the personal data collected for the aforementioned purposes is available and can be consulted at the Data Controller's office and can be requested using the contact details indicated in paragraph 1.

## **6. Cookie policy**

Our site uses technical cookies necessary to ensure that the user has the best functionality and browsing experience. This information does not include the personal data of the Data Subject, but only technical/informatic data in an aggregate and anonymous form for the sole purpose of improving the quality of the service and providing statistics concerning the use of the website. In more detail, the following categories of cookies are used:

1. Technical cookies (first-party cookies): essential for the correct functioning and for the visualisation of the site and to record the user's consent to the use of the cookies themselves.
2. Analytical cookies (third-party cookies): they are used in aggregate and anonymous form, for the purposes of analysing visits to the site, through the use of a third-party service (Google Analytics).

For more information, please consult the page dedicated to cookies on this site.

## **7. What are the rights of the Data Subjects**

1. The Data Subject is the natural person, identified or identifiable, to whom the personal data being processed refer and therefore is the user accessing the site and requesting the provision of services.
2. Each Data Subject is entitled at any time to access the data concerning him/her that is processed by the Data Controller, in order to verify its correctness and to verify the lawfulness of the processing being performed. The Data Subject can exercise the following rights:
  1. Right of access to personal data
  2. Right to obtain rectification, deletion or restriction of personal data;
  3. Right to withdraw consent and object to the processing at any time;
  4. Right to data portability;
  5. Right to lodge a complaint with a supervisory authority;

With regard to how to exercise the aforementioned rights, the Data Subject may write to: [trasmaspaspa@trasmaspaspa.com](mailto:trasmaspaspa@trasmaspaspa.com).

## **8. Duration of data retention**

The personal data referred to in Section 2 will be processed by the Data Controller for a period of time equal to the minimum necessary, as indicated in Recital 39 of the Regulation, i.e. until the termination of the contractual relationships between the Data Subject and the Data Controller, without prejudice to a further retention period that may be imposed by law as also provided for by Recital 65 of the Regulation.

## **9. Changes and updates**

This Information Notice may be subject to changes and additions, including as a consequence of any subsequent amendments and/or additions to the regulations, so please consult this page of the site regularly.