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PRIVACY POLICY & COOKIE

1. PRIVACY POLICY

Privacy policy and cookie policy pursuant to Art. 13 of the UE General Data Protection Regulation 2016/679 (GDPR)

VEMEC SRL with registered office in Via 1° Maggio snc , Ardesio, is constantly committed to protect the on-line privacy of its users.

A) Source of personal data and Controller

This document was drafted pursuant to art. 13 of Regulation EU 2016/679 (hereinafter: “**Regulation**”) to allow you to understand our privacy policy. It describes the general methods of processing the website users’ personal data and the cookies and how your personal information is managed when using our website www.vemecsr.com (hereinafter the “**Website**”). The information and data provided by you or otherwise acquired when using the services of *Vemec srl*, – for example: access to the reserved area of the Website, the newsletters, etc., hereinafter the “**Services**” -, will be processed in compliance with the provisions of the Regulation and the confidentiality obligations underlying the activities of Vemec srl.

According to the terms of the Regulation, the processing by Vemec srl will be based on the principles of lawfulness, correctness, transparency, limitation of purposes and storage, minimisation of data, accuracy, integrity and confidentiality.

The Controller of the processing on the Website is *Vemec srl* with registered office in via 1° Maggio snc, as defined above, to whom you may write to obtain any information concerning the processing of personal data.

The Officier for protecting personal data (hereinafter, “DPO”) can be contacted at the following address: privacy@vemecsr.com

This Privacy Policy is issued only for this website and not for any other websites the user may consult via any links. Please refer to any specific sections of the Website where you can find specific information and any requests for consent for processing individual data.

B) Types of data

After navigating on the Website, we inform you that VEMEC SRL will process your personal data (art. 4(1) of the Regulation) hereinafter only “**personal data**”.

In particular the personal data processed on the Website are the following:

1. Navigation data

During normal operation, the computer systems and software procedures for the operation of this Website acquire some personal data which is implicitly transmitted in the use of Internet communication protocols. This information is not gathered in order to be associated to the identified Data Subjects, but which by its very nature could, if processed and associated to data held by third parties, lead to the identification of the users. This category of data includes the IP addresses or names of computer domains used by the users when connecting to the website, URI (Uniform Resource Identifier) addresses of requested resources, the time of the request, the method used in submitting the request to the server, the size of the file obtained in reply, the numerical code indicating the state of the reply given by the server (OK, error, etc.) and other parameters concerning the operating system and computer environment of the user. This data is used only for anonymous statistical information concerning the use of the website and to check the correct operation (see the cookie policy paragraph), to identify anomalies and/or abuses, and are deleted immediately after processing. Data may be used by the competent authorities to ascertain responsibility in the case of hypothetical data processing crimes to the detriment of the website.

2. Data provided voluntarily by the data subject

Apart from what specified for the navigation data, the user is free to provide the personal data indicated in any request forms on the website (e.g. to subscribe to the newsletter, free registration, purchases, etc.). If such information is not provided, however, it may be impossible to provide the requested services. In these cases, only the information necessary for the requested service will be required (see details in each specific information notice).

When using some Services on the Website, some third party personal data sent to VEMEC SRL may be processed. In this case, you shall be considered an independent controller, with all the related obligations and legal responsibilities. In this sense, you shall hold VEMEC SRL harmless of all disputes, claims and requests for compensation by third parties whose personal data is processed while using the functions of the Website in breach of the applicable personal data processing laws. In any case, if you provide or in any way process third party personal data when using the Website, you hereby guarantee – holding all related liability – that this specific hypothesis of processing is based on a suitable legal basis pursuant to art. 6 of the Regulation which legitimises the processing of the information in question.

C) Purposes of the processing and legal bases

The personal data we intend to process, with your specific consent where necessary, has the following purposes:

To consent to the provision of the Services on the Website;

The legal basis for the processing is the fulfilment of pre-contractual requirements at the request of the data subject (art. 6(1)(b) of the Regulation) as the processing is required for the provision of the Service. The provision of Personal Data for these purposes is optional, but if the data is not provided it will not be possible to enable the Services provided by the Website.

D) Recipients of the personal data

Your personal data may be disclosed, for the above purpose, to:

- persons authorized by VEMEC SRL to process personal data required to perform activities strictly related to the provision of the Services, who have signed a confidentiality undertaking or have suitable legal obligations to maintain confidentiality (e.g. employees and system administrators)
- any third parties managing the Website who usually work in their capacity as data processors
- bodies or authorities to whom the disclosure of your personal data is mandatory due to legal provisions or orders issued by the authorities.

E) Transfer of personal data

Some of your personal data are shared with Recipients who may also be outside of the European Economic Area. VEMEC SRL ensures that your personal data will be processed by these Recipients in compliance with the Regulation. The data may be transferred based on a decision of suitability, the Standard Contractual Clauses approved by the European Commission or other suitable legal basis.

F) Your privacy rights pursuant to articles 15 and following of the Regulation

Pursuant to articles 15 and following of the Regulation, you have the right to request at any time from VEMEC SRL access to and rectification or erasure of personal data, object to its processing, or request the restriction of processing in the cases laid down in art. 18 of the Regulation, or receive it in a structured, commonly used and machine-readable format, in the cases laid down in art. 20 of the Regulation.

Requests must be submitted in writing to the Controller at the following address: privacy@vemecsrl.com, that is the DPO (Data Protection Officer) at the following address: privacy@vemecsrl.com.

In any case you always have the right to submit a complaint to the competent control body, the Italian Data Protection Authority (Garante per la Protezione dei Dati Personali), pursuant to art. 77 of the Regulation, if you think that your data has been processed in breach of the laws in force.

G) Amendments

This privacy policy is in force from 25/05/2017. VEMEC SRL reserves the right to modify this policy or update its contents, partially or fully, also due to variations in the applicable legislation VEMEC SRL will notify you of such variations as soon as they are introduced and they will be binding once published on the Website. VEMEC SRL invites you to regularly visit this section to acknowledge the most recent and updated version of the privacy policy in order to keep updated on the data gathered and the use of such data by VEMEC SRL.

2. COOKIE POLICY

Definitions, characteristics and application of the law

Cookies are small text files that the websites visited by users send to their computer or mobile device, and sent back to the same websites during subsequent visits. Using cookies, a website remembers the user's actions and preferences (for example login data, chosen language, font size, other viewing settings, etc.) so that they do not have to be indicated again when the user visits the website again or navigates from one page to another on the same website. Cookies are therefore used to run computer authentications, monitor sessions and store information on the activities of users accessing a website and may also contain a unique id code used to keep track of the user's navigation in the website for statistical or advertising purposes. When navigating in a web, users may receive some cookies on their own computer other than those sent by the website or server they are visiting (so-called "third party" cookies). It may not be possible to run some operations without using cookies, which in certain cases are technically necessary to run the website.

There are various types of cookies, depending on their characteristics and functions, and they may remain in the user's computer for different times: so-called session cookies, which are automatically deleted when the browser is closed; so-called persistent cookies, which remain on the user's device until their set expiry date.

According to Italian law, the express consent of the user is not always required for the use of cookies. In particular, consent is not required for "technical cookies", those used solely to send a communication on an electronic communication network, or which are strictly necessary to provide a service expressly requested by the user. In other words, these cookies are indispensable for the operation of the website or are necessary to perform the activities requested by the user.

Technical cookies which do not require the express consent for their use, according to the Italian Data Protection Authority (see the "Order on the identification of simplified methods for providing information

and obtaining consent for the use of cookies” of 8 May 2014 and subsequent clarifications, hereinafter referred to as the “Order”) also include:

- “analytics cookies” where used directly by the manager of the website to gather information in aggregated form on the number of users and how they visit the website;
- navigation or session cookies (for authentication),
- function cookies, which allow the user to navigate according to a series of selected criteria (for example, language, products selected for purchase) to improve the service provided.

“Profiling cookies” on the other hand are those used to create user profiles and are used in order to send advertising messages in line with the preferences shown by the user when navigating the web, and the prior consent of the user is required for these.

Types of cookies used on the Website

We have classified the cookies we use according to the type of use:

1) TECHNICAL COOKIES:

- a. navigation or session cookies***
- b. function cookies***
- c. analytics cookies***

2) THIRD PARTY COOKIES

1) TECHNICAL COOKIES:

a. NAVIGATION OR SESSION COOKIES

Cookies which allow the normal use of the website and the services presented on the site, for example to make a purchase, access reserved areas and maintain personal preferences. This type of cookie may be distinguished according to their persistence on the user’s terminal: those which are deleted automatically after navigation, called “session cookies” (for example the on line shopping cart). If vice versa they have a longer life, we talk of “permanent cookies”. These cookies are indispensable for the correct operation of the website and the users’ prior consent is not required for their installation.

b. FUNCTION COOKIES

We use these cookies to provide services or store your settings, to improve your visit and navigation experience on our website. They allow us to manage your navigation according to the products selected and/or manage the Wish List. To install these cookies no prior consent of the users is required. Here is a list of these cookies:

c. ANALYTICS COOKIES

These cookies anonymously gather information on how our website is used and help us to find out more about our users and improve the operation of the website. Analytics cookies are similar to technical cookies when used directly by the website manager to gather information in aggregated form on the number of users and how they visit the website: the prior consent of the user is not required for the installation of these cookies. Here is a list of these cookies:

2) **THIRD PARTY COOKIES**

“Third party” cookies are linked to services provided by third parties: they are used for different purposes, for example to analyse marketing campaign trends and/or to provide custom advertising on our website and partner websites. This activity is called retargeting and is based on the navigation activities, such as the destination sought, structures viewed and so on. The third party provides these services in exchange for information on the user’s visit to our website. Third party cookie suppliers are also bound to comply with the laws in force. For this reason refer to the web pages of the third party websites, where users can find the cookie consent forms and information notices.

Here is a list of these cookies:

Social plugins

Our websites uses social plugins (“plugins”) provided by the following social networks: Facebook, Pinterest, Twitter, LinkedIn, YouTube and Google Plus.

Cookies are left by these platforms on our website to allow them to collect information about your browsing.

For further information about the cookie policy and the privacy policy, please click the following links:

Facebook [click here](#), Twitter [click here](#), Youtube [click here](#), Google Plus [click here](#).

Web beacons

Web beacons are tiny invisible images that VEMEC SRL uses in its newsletters. These images are used to identify the statistical information relating to the use of the newsletters and allow VEMEC SRL to improve this service. If you wish to prevent this statistical information from being gathered, you must set the HTML disabling in the e-mail system so that the VEMEC SRL newsletter is read as text-only. All the newsletters sent by VEMEC also contain a link which allows you to cancel your subscription.

Your decisions on cookies

You can select a function by which your computer warns you whenever a cookie is set, or you can decide to disable all cookies. You can select these functions in your browser settings. Every browser is slightly different, so please identify the most correct way to edit the cookie functions in the “Help” menu of your browser. If you decide to disable the cookies, you will not have access to many functions which make your experience on our website more efficient and some of our services will not run correctly.

Instructions for managing cookies

If you have a different type or version of the browser, please refer to the “Help” menu in your browser.

Internet Explorer 7 e 8

1. Click on Tools and select Internet Options
2. Click on the Privacy form
3. Move the cursor to select the preferred settings
4. For more specialist cookie settings, click on Websites or Advanced
5. For instructions on how to eliminate cookies in Internet Explorer, [click here](#)

Google Chrome

1. Click on Chrome, then select Settings
2. Click on Show advanced settings
3. Click on Content settings to select the preferred settings
4. For instructions on how to eliminate cookies in Chrome, [click here](#)

Mozilla Firefox 14, 15, e 16

1. Click on Firefox (or Tools), then select Options. For Mac OS X users, click on Firefox, then select Preference
2. Click on the Privacy panel to select your preferred settings
3. For more specialist cookie settings, set Firefox: use custom settings to store navigation data
4. For instructions on how to eliminate cookies in Firefox, [click here](#)

Safari 5.1 and subsequent versions (Mac OS X)

1. Click on Safari, then select Preferences
2. Click on the Privacy form to view the cookie settings
3. Select the preferred settings
4. For more specialist cookie settings, click on Details
5. For instructions on how to eliminate cookies in Safari, [click here](#)

Opera

1. Open the Tools menu and select Preferences
2. Click on the Advanced form
3. In the Cookies section: click on Manage cookies
4. Select the required options
5. For instructions on how to eliminate cookies in Opera, [click here](#)

Your on-line preferences via inter-professional websites

We invite you to access the website [Youronlinechoices](#) proposed by professional advertising companies belonging to the European Association EDAA (European Digital Advertising Alliance) and managed in Italy by the Interactive Advertising Bureau Italia (<http://www.iab.it/>). In this way you can know which companies are registered to this platform, offering you the possibility to refuse or accept the cookies they use to adapt the advertising which could be viewed on your computer device according to our navigation information: <http://www.youronlinechoices.com/it/>