

# Privacy Policy- GDPR

## Legal definitions

- 1. Customer:** natural person of legal age or legal person who, in the person of its pro tempore legal representative, makes use of or intends to make use of the services offered by Extreme Analyzes Engineering s.r.l.
- 2. General Conditions:** general contract conditions that regulate and govern the performance of the services.
- 3. Cookies:** cookies are text files (letters and / or numbers) that contain packets of information that are stored on the user's computer or mobile device every time he visits a website through a browser. At each subsequent visit, the browser sends cookies to the website that originated them or to another site. Cookies can be stored only for the time of use of a certain site (i.e. session cookies), or for a longer period of time independent of the session (i.e. persistent cookies).
- 4. CRM:** Customer Relationship Management software, aimed at managing the interactions with customers and potential customers of the company, which uses and processes personal data of the same, in order to improve the commercial relationship with Extreme Analyzes Engineering s.r.l. and the provision of services.
- 5. Personal Data:** any information relating to a natural person, identified or identifiable, directly and indirectly, by reference to the name, an identification number, location data, an online identification or elements characteristic of his physical, physiological identity , genetic, psychic, economic, cultural or social.
- 6. Disclosure:** this document consisting of the disclosure on the processing of Personal Data.
- 7. Profiling:** form of Personal Data Processing, through procedures - in whole or in part - automated, aimed at evaluating or predicting customer preferences and interests.
- 8. Regulation:** EU Regulation 2016/679 of April 27, 2016.
- 9. Accessory Services:** services offered on the site, such as, for example, the contact request, the download of e-books or various attachments, the booking of a call with Extreme Analyzes Engineering s.r.l..
- 10. Services:** provision of activities, strategies, promotions in any way and / or form, aimed at promoting knowledge, dissemination, advertising and promotion of customer goods and services, contractually regulated and in compliance with current regulations.
- 11. Site:** this site.
- 12. Treatment:** any operation or set of operations concerning Personal Data, such as, by way of example, the collection, organization, structuring, storage, modification, extraction, consultation, use, communication, interconnection, limitation, cancellation and destruction.
- 13. Users:** users of the Site, including the Customers and potential customers of Extreme Analyzes Engineering s.r.l. , as well as any other natural person browsing the site.

## 2. Owner and manager of the treatment

The owner of the treatment referred to in this statement is: Extreme Analyzes Engineering s.r.l. Via S. Biagio 15 / C - 37052 Casaleone (VR) - [info@extraengineering.com](mailto:info@extraengineering.com) - P.I. / C.F. 04321620231  
Responsible for the treatment referred to in this Notice is the CEO of the company: Extreme Analyzes Engineering s.r.l. Via S. Biagio 15 / C - 37052 Casaleone (VR) - [info@extraengineering.com](mailto:info@extraengineering.com) - P.I. / C.F. 04321620231  
Any User request relating to the Treatment performed by Extreme Analyzes Engineering s.r.l. concerning their Personal Data (including the exercise of the rights referred to in point 9 below) will be addressed to Extreme Analyzes Engineering s.r.l. by post at the registered office, or by e-mail to the following address [info@extraengineering.com](mailto:info@extraengineering.com).

### 3. Purpose and legal basis of the Treatment

- a. Navigation on the Site: consent;
- b. Use of the Service: General Conditions;
- c. Sending commercial and promotional communications by Extreme Analyzes Engineering s.r.l. , through Profiling with integration of Personal Data within a CRM: express consent;
- d. Sending commercial and promotional communications by Extreme Analyzes Engineering s.r.l. , through Profiling with integration of Personal Data within a CRM: express consent.

Extreme Analyzes Engineering s.r.l. collects and uses Users' Personal Data for the achievement of the following purposes:

- a) Allow navigation on the Site, essentially through the use of Cookies.

The collection of Personal Data for the purposes referred to in letter a) is governed by the Cookies Policy of which Extreme Analyzes Engineering s.r.l. recommends reading, available on the Site at the following link <https://www.extraengineering.com/cookie-policy/>

- b) Provide the Service to Customers, including the management of the administrative and accounting relationship deriving from the signing of the General Conditions and the sending of communications strictly connected to the performance of the Service of a technical and / or administrative nature (eg updates of this Information ).

The collection of Personal Data for the purposes referred to in letters b) and c) is necessary for access to the Site and use of the Service by the Customer. Any refusal prevents the Customer from using the Service according to the provisions of the General Conditions. These treatments are based on the Customer's signing of the General Conditions and on the related pre-contractual measures proposed by Extreme Analyzes Engineering s.r.l. .

- c) With optional consent, perform statistical analysis and market research, send information and advertising material, report, and invite to, Extreme Analyzes Engineering s.r.l. , also through Profiling;

The collection of Personal Data for the purposes referred to in letter

- d) is necessary for the purposes of access to the Accessory Services by the User, any refusal by the User prevents the latter from using the Accessory Services. The purpose referred to in letter e) is optional and any refusal by the User prevents the latter from taking advantage of marketing activities (also direct and personalized) by Extreme Analyzes Engineering s.r.l. . These treatments are based on the free, specific, informed and unequivocal consent of the User, expressed by means of a declaration or positive action (eg flag) on the Site. The withdrawal of consent can be exercised at any time, following the indications referred to in point 9 letter . a) of this information.

- f) Perform statistical analysis, market research, improve the presentation of the Service and the use of the Site by Users. Where possible, in order to achieve this purpose, Extreme Analyzes Engineering s.r.l. uses anonymous Personal Data (Personal Data that does not identify or make Users identifiable)

The treatment referred to in letter f) is based on the legitimate interest of Extreme Analyzes Engineering s.r.l. consisting of the benefit that it can obtain in being able to make Users an offer more similar to the preferences expressed by its Users while browsing the Site, taking into account the fact that it is also in the interest of Users to benefit from personalized services. For this reason Extreme Analyzes Engineering s.r.l. believes that the legitimate interest in developing and implementing the Site, the Service and the Ancillary Services prevails over the Users' right to privacy. The opposition to this Treatment (where it concerns Personal and non-anonymous Data) can be exercised at any time by following the indications referred to in point 9 lett. f) of this information.

#### **4. Data collection methods**

- a. Personal Data entered on the Site by Customers;
- b. Personal data expressly communicated to Extreme Analyzes Engineering s.r.l. by Customers;
- c. Personal Data collected automatically by the Site (through Cookies).

Extreme Analyzes Engineering s.r.l. collects Personal Data in the following ways:

- a) Personal Data entered on the Site by Users and / or Customers: these are the Personal Data provided, by way of example and not limited to, to navigate and access the services offered by Extreme Analyzes Engineering s.r.l. through the Site;
- b) Personal Data expressly communicated to Extreme Analyzes Engineering s.r.l. by Users and / or Customers in offline mode: they are the Personal Data provided, by way of example, to Extreme Analyzes Engineering s.r.l. (in case of contact request) or collected on the occasion of events and / or initiatives organized by Extreme Analyzes Engineering s.r.l. or communicated to Extreme Analyzes Engineering s.r.l. upon signing the General Conditions;
- c) Personal Data collected automatically by the Site: these are the Personal Data collected automatically by the Site through, but not limited to, Cookies (for further information, Extreme Analyzes Engineering s.r.l. recommends reading the Cookie Policy available on the Site at the following link: <https://www.extraengineering.com/cookie-policy/>).

#### **5. Any categories of recipients of Personal Data Employees, collaborators, third party IT service providers, technical and commercial third parties.**

Personal Data are processed by Extreme Analyzes Engineering s.r.l. and / or by third parties, selected for reliability and competence, and to whom they can be communicated as necessary or appropriate, provided within Italy or the European Union. In particular, Extreme Analyzes Engineering s.r.l. informs Users that Personal Data may be processed by, and / or communicated to:

- a. Employees and / or collaborators of Extreme Analyzes Engineering s.r.l.
- b. Third parties suppliers of services necessary to guarantee the functioning of the Site (for example: company that deals with hosting services);
- c. Third parties suppliers of services necessary for the use of the Service (e.g. payment managers);
- d. Administrative and supervisory authorities;
- e. Third parties who provide analysis services for browsing the Site; f. With the optional consent of the User and / or the Customer, third parties that provide automatic services for sending newsletters and / or any other type of commercial communication, marketing services, promotion, analysis of consumption habits and choices, Profiling.

#### **6. Retention period of Personal Data (or criteria for determining this period)**

- a. for the use of the services: 10 years;
- b. for commercial and promotional purposes: until revoked.

Personal Data is stored by Extreme Analyzes Engineering s.r.l. for the period of time strictly necessary to achieve the purposes for which they were collected, as indicated in point 3 above. In particular, unless the right to withdraw consent pursuant to point 9 lett. a) and / or opposition pursuant to point 9 lett. f):

- a. for the use of the services, Extreme Analyzes Engineering s.r.l. retains Personal Data for the duration of the services and for a further 10 years, for the purposes of fulfilling the Presidential Decree 430/2001;
- b. for commercial and promotional purposes, Extreme Analyzes Engineering s.r.l. retains Personal Data until explicit revocation of its consent by the User and / or Customer. In any case, Extreme Analyzes Engineering s.r.l. is authorized to retain, in whole or in part, the Personal Data for the maximum period of 10 years from the collection, limited to the information necessary to fulfill legal

obligations and allow Extreme Analyzes Engineering s.r.l. itself the possible assessment, exercise and defense of one's own right in court and / or in the tax assessment.

After these terms, Extreme Analyzes Engineering s.r.l. will automatically delete the collected Personal Data, or transform them anonymously in an irreversible way.

## **7. Possible transfer of Personal Data to countries outside UE**

Yes

Personal Data collected by Extreme Analyzes Engineering s.r.l. for the purposes referred to in point 3 of this Information, they are transmitted by Extreme Analyzes Engineering s.r.l., pursuant to art. 45 of the Regulation, to the United States organizations listed at the following points by virtue of the belonging of these subjects to the so-called Privacy Shield List (that is, the list indicating the United States organizations that guarantee adequate data protection levels that comply with the European principles on the treatment), published and updated on the basis of the adequacy decision of the European Commission n. 2016/1250, adopted pursuant to art. 25 of Directive 95/46 / EC, which will remain in force until revoked, modified or repealed pursuant to art. 45 of the Regulation.

- a. Google LLC;
- b. MailChimp The Rocket Science Group;
- c. Facebook Inc.
- d. LinkedIn Corporation

## **8. Profiling**

Automated processing of customer personal data for evaluation and / or predictive purposes.

Profiling performed by Extreme Analyzes Engineering s.r.l. has the following characteristics:

- a)** Object: Personal Data of Users (including Customers) collected on the Site, or on the occasion of participation in events organized by Extreme Analyzes Engineering s.r.l. , suitable for revealing tastes and preferences;
- b)** Purpose: to improve the promotion and advertising communication of the services offered, by sending commercial communications in line with the Personal Data of Users (including Customers) collected on the Site, the eventual sending of holiday greeting cards and the reporting of events organized by Extreme Analyzes Engineering srl (e.g. fairs). Profiling is therefore aimed at defining the profile or personality of the Users (including the Customers), or to make forecasts on future choices, or to monitor the use of electronic communication services;
- c)** Effects for Users (including Customers): receipt of commercial communications in line with the preferences expressed by Users (including Customers) in navigating the Site and in using the Service and greeting cards. In no way, the Profiling of Extreme Analyzes Engineering s.r.l. : i) constitutes an automated decision-making process from which legal or similarly significant effects derive for Users; ii) affects the behavior and choices of use of the Accessory Services and / or the Service by Users (including Customers); iii) has a prolonged and permanent impact for Users, considering that the Personal Data collected by Extreme Analyzes Engineering s.r.l. they can be independently updated at any time by Users; and iv) due to the type of service offered by Extreme Analyzes Engineering s.r.l. and the category of Users affected by this Treatment, does not result in any discrimination of Users.

## **9. User and / or customer rights**

Revocation of consent, access to Personal Data, rectification or integration of Personal Data, cancellation of Personal Data, limitation of Treatment, opposition to Treatment, portability of Personal Data, data breach, complaint to the competent authorities

Pursuant to and for the purposes of the Regulation, for the period referred to in point 8 of this Policy, each User (including Customers) has the right to:

- a.** With reference to the treatment referred to in point 3 letters d) and e), withdraw your consent at any time without prejudice to the lawfulness of the treatment, by sending an e-mail to Extreme Analyzes Engineering srl, exercising the opt-out in the commercial communications of Extreme Analyzes Engineering srl ;
- b.** Ask Extreme Analyzes Engineering s.r.l. access to personal data and information on the related processing and any copy in electronic format, unless specifically requested by the user (see art. 15 of the Regulation);
- c.** Ask Extreme Analyzes Engineering s.r.l. rectification and / or integration of Personal Data, without undue delay (see art. 16 of the Regulation);
- d.** For specific reasons (for example, unlawful processing, revocation of consent, non-existence of the purpose of the Processing), request the cancellation of Personal Data, without undue delay (see art.17 of the Regulation);
- e.** to resort to specific hypotheses (for example, inaccuracy of Personal Data, illegality of the Treatment, exercise of a right in court), to request the limitation of the Treatment (art.18 of the Regulation);
- f.** With reference to the treatment referred to in point 3 letters d) and e), to object at any time to the processing of personal data, by sending an e-mail to Extreme Analyzes Engineering s.r.l. (see art.21 of the Regulation);
- g.** Be informed by Extreme Analyzes Engineering s.r.l. without undue delay of any violations or unauthorized access by third parties to their systems containing Personal Data (so-called data breach - see Article 34 of the Regulation);
- h.** Propose a complaint to the supervisory authority of the EU country in which you reside, work or where you believe the violation of your rights has occurred (see art. 77 of the Regulation).

**For more information on the terms and conditions for exercising the rights granted to the User**, the latter can consult the text of the EU Regulation published at the following link <https://eur-lex.europa.eu/legal-content/IT/TXT/?uri=CELEX:32016R0679>, or contact Extreme Analyzes Engineering s.r.l. in the forms provided for in point 2 of this Policy.