

INFORMATION ON PERSONAL DATA PROCESSING **of users who consult the Odos Servizi Srl website according to Article 13 of** **Regulation (EU) 2016/679**

PURPOSES OF PROCESSING

Under Legislative Decree 196/03 and Regulation (EU) 2016/679 (hereinafter "**GDPR**"), this page describes the methods of processing the personal data of users who consult the website of the Data Controller, identified below, accessible electronically to the following address:

www.odosgroup.it

This information does not concern other websites, pages or online services, which can be reached through hypertext links published on the website.

DATA CONTROLLER

Following consultation of the sites listed above, data relating to identified or identifiable individuals may be processed.

The Data Controller is **Odos Servizi Srl – Baluardo La Marmora n.15 e-mail: odosservizi@legalmail.it Tel. + 39 0321/612966**

LEGAL BASIS OF THE PROCESSING

Odos Servizi Srl processes the personal data indicated on this page to manage the commercial relationship and provide the service offered.

TYPES OF DATA PROCESSED AND PURPOSE OF PROCESSING

Browsing data

During their regular operation, the computer systems and software procedures used to operate this website acquire personal data, which transmission is implicit in internet communication protocols.

These data are not collected to be associated with identified data subjects. However, by their very nature, they could allow users to be identified through processing and association with the data held by third parties.

This category of data includes: IP addresses or domain names of the computers used by users who connect to the website; URI (Uniform Resource Identifier) addresses of the requested resources; the time of the request; the method used to submit the request to the server; the size of the file obtained as a response; the numerical code indicating the status of the answer given by the server (successful, error, etc.) and other parameters relating to the operating system and IT environment.

This data, necessary for the use of web services, is also processed for:

- obtaining statistical information on the use of the services (most visited pages, number of visitors per hour or day, geographical areas of origin, etc.);
- obtaining anonymous statistical information about website usage and checking its correct functioning. This data is deleted immediately after processing. The data could be used to ascertain responsibility in the event of hypothetical computer crimes to the detriment of the website.

Data voluntarily provided by the user

The optional, explicit and voluntary transmission of personal data to access certain services (user registration to access restricted areas), or to request information to the addresses indicated on the aforementioned website, involves the subsequent acquisition of the personal data included in the request of the sender, which are necessary to provide an answer. Sending e-mails to the

addresses listed on this site involves acquiring the sender's address and any other data included in the message, which are necessary to respond to requests.

This data category includes the name, surname, email address, geographical address, telephone contact, company name, etc.

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COOKIES

Per the provision of the Authority for the Protection of Personal Data n. 229 of May 8, 2014, on "Defining simplified methods for the Informative Notice and acquisition of consent to use cookies", **Odos Servizi Srl** informs users about the use of navigation cookies on this website www.odosgroup.it. Users should note that this policy refers only to this site and not to third-party websites, which they may reach through links on the page.

What are cookies

A cookie is a small file sent to your browser and saved on your device when you visit a website such as www.odosgroup.it. Cookies allow for the efficient operation of the Website and improve its performance. They also provide information to the Website owner for statistical or advertising purposes, mainly to personalize your navigation experience by remembering your preferences. www.odosgroup.it uses different types of first-party cookies (prepared and managed by **Odos Servizi Srl**) and third-party cookies (prepared and managed by third parties based on their privacy policies and not under the control of **Odos Servizi Srl**) as shown in the following explanatory table:

TYPES OF COOKIES	PURPOSE	APPLICATION
Technical cookies (session or browsing)	They ensure the regular use of the website by optimizing its internal navigation functionality	Odos Servizi Srl uses this type of cookie by default.
Functional cookies	They are strictly necessary to provide the services explicitly requested by the user.	Odos Servizi Srl uses this type of cookie by default.
Analytical cookies (first part)	The Data Controller created them exclusively to collect aggregated and anonymous information on the number of users visiting the website and their access dynamics.	Odos Servizi Srl uses this type of cookie by default.
Third-party analytical cookies (e.g., Google Analytics)	Odos Servizi Srl -Opere e Promozioni has adopted suitable tools to ensure that the processing with these cookies is carried out for mere statistical purposes.	Odos Servizi Srl uses this type of cookie.

Profiling cookies	Profiling cookies are intended to create user profiles and are used to send advertising messages in line with the preferences shown by users while browsing the web.	Odos Servizi Srl does not use this type of cookie without the consent of the user / interested party.
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PURPOSE OF DATA PROCESSING FROM COOKIES

The purposes for which cookies are used on our site are the following:

1. Facilitating user navigation
2. Performing computer authentication
3. Monitoring browsing sessions

PROVISION OF DATA AND CONSEQUENCES OF REFUSAL

With references to points 1, 2 and 3 above, the installation of these cookies is not subject to the prior consent of the users / interested parties, as they are strictly necessary to carry out the transmission of the communication over an electronic communication network.

The processing will be carried out with automated systems designed to store and manage the data in compliance with the purposes indicated and to guarantee the security and confidentiality of the data.

Enabling and disabling cookies from the browser

Most browsers are configured to accept, check or possibly disable cookies through the settings. Disabling navigation or functional cookies can cause **www.odosgroup.it** to malfunction and/or limit the service offered.

You will find below the link to manage cookies from the following browsers:

Chrome:

<https://support.google.com/chrome/answer/95647?co=GENIE.Platform%3DDesktop&hl=it>

Firefox:

<https://support.mozilla.org/it/kb/Eliminare%20i%20cookie>

Internet Explorer:

<https://support.microsoft.com/it-it/help/278835/how-to-delete-cookie-files-in-internet-explorer>

Opera:

<https://www.opera.com/help/tutorials/security/privacy/>

Safari:

<https://support.apple.com/it-it/HT201265>

Enabling and disabling third-party cookies

Below are the links to the web pages containing the information adopted by the third parties managing cookies on **www.odosgroup.it**, to organize and possibly disable them:

Facebook:

<https://it-it.facebook.com/policies/cookies/>

Google Analytics:

<https://support.google.com/analytics/answer/181881?hl=it>

Instagram:

<https://help.instagram.com/1896641480634370>

Linkedin:

https://www.linkedin.com/legal/cookie-policy?_l=it_IT

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PURPOSE AND OPTIONALITY OF TREATMENT

The personal data collected through the website SITE are used for the following purposes:

- for the contact request from our company **Odos Servizi Srl**
- for commercial requests
- for the unsolicited application of potential workers, employees or collaborators

Specific summary information will also be sent directly to the user or reported or displayed in particular sections of the website above. They will be prepared for specific services requested by the user and subject, if necessary, to the interested party's consent.

Apart from what has just been specified, the user is free to provide personal data, particularly the data contained in the request forms on the website **www.odosgroup.it**. Failure to provide data may make it impossible to obtain the requested service.

DATA PROCESSING METHODS

The personal data are processed by automated means for the time strictly necessary to fulfil the objectives for which they were collected.

Specific security measures are observed to prevent data loss, the illicit or incorrect use thereof, and unauthorised access.

DATA RETENTION PERIOD

Personal data collected using the Website **www.odosgroup.it** are processed for the time strictly necessary to achieve the purposes for which they were collected and, once completed, for the times established by the applicable regulations.

Please refer to the information sheets prepared for particular recipients (customers, suppliers, employees, etc.) for more details.

SCOPE OF THE DISCLOSURE OF PERSONAL DATA AND RECIPIENT CATEGORIES

All data collected and processed may be provided, exclusively for the previously indicated purposes, to internal figures authorised to process personal data in the performance of their respective duties, as well as to external subjects who may require access to such data. Should such recipients, external to the company, process data on behalf of **Odos Servizi Srl**, they will be designated as External Data Processors with a specific contract or other legal act according to art. 28 GDPR.

For further details, refer to the disclosures provided for particular services.

DATA TRANSFER TO A THIRD COUNTRY AND/OR INTERNATIONAL ORGANISATION

Your data will not be transferred to non-European Countries.

For strictly organizational needs, some personal data may be transferred to non-EU countries. The Data Controller uses Cloud services provided by suppliers selected from those who provide adequate guarantees as Art. 46 GDPR requires.

RIGHTS OF DATA SUBJECTS

The Data Controller, from now on, informs users of the website **www.odosgroup.it** to which the personal data refer ("Interested") of the following rights, which they can exercise at any time:

- **Right TO BE INFORMED** (transparency in data processing)

The Data Subject has the right to be informed about how the Data Controller processes their data, for which purposes and any other information provided by Art. 13 of the GDPR. For this purpose,

the Data Controller has implemented organizational processes that allow, at the time of acquisition or request of personal data, the issue of an "ad hoc" privacy notice according to the category of Data Subjects to which the user belongs (employee, customer, supplier etc.) This document allows one to adequately inform all the subjects to whom the data relates to how the Data Controller's processing is carried out. The information model may be requested with a specific application to the latter.

- **Right of withdrawal of consent** (art. 13 (2) lit a)

The data subject shall have the right to withdraw their consent at any time for all the processing whose lawfulness is a manifestation of their approval. The withdrawal of consent does not affect the lawfulness of the processing carried out up to that moment.

- **Right of access to data** (art. 15 GDPR)

The interested party may request: a) the purposes of the processing; b) the concerned categories of personal data; c) the recipients or categories of recipients to whom the personal data have been or will be communicated, in particular if they are recipients of third countries or international organizations; d) when possible, the retention period of the personal data envisaged or, if not possible, the criteria used to determine this period; e) the existence of the right of the interested party to ask the data controller to correct or delete personal data or limit the processing of personal data concerning them or to oppose their treatment; f) the right to lodge a complaint with a supervisory authority; g) if the data are not collected from the data subject, all available information on their origin; h) the existence of an automated decision-making process, including the profiling referred to in Article 22, paragraphs 1 and 4, and, at least in such cases, significant information on the logic used, as well as the importance and expected consequences of such processing for the interested party. You have the right to request a copy of the personal data undergoing processing.

- **Right of reply** (art. 16 GDPR)

The interested party has the right to request the correction of any inaccurate personal data concerning them and to integrate the incomplete personal data.

- **Right to erasure "right to be forgotten"** (art. 17 GDPR)

The Data Subject has the right to obtain from the Data Controller the deletion of personal data concerning them if: the personal data are no longer necessary for the purposes for which they were collected or otherwise processed; the Data Subject withdraws their consent; there is no prevailing legitimate reason for proceeding with the processing of profiling; the data has been processed unlawfully; there is a legal obligation to delete them; the data is related to Web services rendered to minors without relative consent. The cancellation can occur unless the right to freedom of expression and information prevails, whether they are kept for the fulfilment of a legal obligation or the performance of a task carried out in the general interest or the exercise of public powers, for reasons of public interest in the health sector, for purposes of archiving in the public interest, scientific or historical research or for statistical purposes or the establishment, exercise or defence of a right in court.

- **Right to restriction of processing** (art. 18 GDPR)

The interested party has the right to obtain from the data controller the limitation of processing when they have contested the accuracy of personal data (for the period necessary to the data controller to verify the accuracy of such personal data); or if the processing is unlawful, but the interested party is against the deletion of personal data and asks instead that their use be limited or if they are necessary for the assessment, exercise or defence of a right in court, while they are no longer necessary for the Data Controller.

- **Right to portability** (art. 20 GDPR)

The interested party has the right to receive the personal data concerning them in a structured, commonly used and machine-readable format, and they have the right to transmit them to another Data Controller if the processing is based on consent, on the contract and if the processing is

carried out by automated means, unless the processing is necessary for the performance of a task carried out in the public interest or related to the exercise of general powers and that such transmission does not infringe the right of third parties.

- **Right to object** (art. 21 GDPR)

The Data Subject shall have the right to object at any time, on grounds relating to their particular situation, to the processing of personal data concerning them, under **Article 6, (1) e or f**. **The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights, and freedoms of the data subject or for the establishment, exercise or defence of legal claims.** Where personal data are processed for direct marketing purposes, the Data Subject shall have the right to object at any time to the processing of personal data concerning them for such purposes, which include profiling to the extent that it is related to such direct marketing. From such moment the personal data will not be subject to treatment for such purposes.

- **Right to object to automated decision-making processes** (art. 22 GDPR)

The Data Subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning them or similarly significantly affecting them.

This right does not apply if the decision is (a) necessary for the conclusion or execution of a contract between the Data Subject and the Data Controller, or (b) is based on the Data Subject's consent.

- **Right to lodge a complaint with a Supervisory Authority** (art. 77 GDPR).

Without prejudice to any other administrative or judicial appeal, for which the interested party may appeal to the competent judicial authorities pursuant to art. 79 GDPR, if the Data Subject believes that the treatment concerning them violates the regulation on data protection, they shall have the right to lodge a complaint with a supervisory authority, specifically in the Country where they habitually live, work, or where the alleged infringement took place.

Requests for protection should be addressed to the Data Controller for the rights referred to in Articles. 13-20 GDPR:

- Via e-mail, to:

- via Certified email, to the address: odosservizi@legalmail.it

- by post, to the Data Controller: **ODOS SERVIZI SRL, Baluardo La Marmora n. 15, 28100 Novara**

- Requests for protection should be addressed to the Guarantor for the protection of personal data for the rights referred to in art. 77 GDPR:

- by post, to the Personal Data Protection Authority - Personal Data Protection Officer, **Piazza Venezia, 11, IT-00187, Rome**

- via e-mail, to:

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Last updated: **September 2021.**

This Policy is subject to change. Therefore, it is advisable to check this web page regularly and consider the most up-to-date version of the information contained therein.