

PRIVACY & COOKIE POLICY

Welcome to the Euricom S.p.A. website www.euricom.it (hereafter the “**Website**”).

With this Privacy & Cookie Policy, Euricom S.p.A., as the data controller, aims to provide information relating to the processing of personal data collected automatically or that you provide willingly by accessing and browsing the Website, using the services provided therein, as well as the function of the cookies installed or in any case present. The aim of Euricom S.p.A. is to guarantee the protection of your personal data at all times.

Browsing is free and does not require registration of any kind; providing personal data is required in some sections where reference is made to the content of this document.

On the Website there could also be hyperlinks to third party websites, pages or on-line services. Clicking on these links you can access multimedia content which, being the exclusive property of the aforementioned parties, are beyond the control of Euricom S.p.A. and are not subject in any way to what is indicated here in this Policy. Euricom S.p.A. therefore invites you to pay attention when subscribing to services offered by third parties, to carefully read the relative privacy information provided by the respective third parties relating to the processing of personal data in relation to which Euricom S.p.A. cannot carry out any controls, nor be held responsible.

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1. Data controller

The Data controller is Euricom S.p.A. (Tax Code 05897170154) with registered offices in Via Stazione no. 119, Valle Lomellina (PV) (hereafter the “**Company**”).

2. Data Protection Officer

The Company, considering the protection of your personal data to be of primary importance, has appointed a Data Protection Officer (hereafter the “**DPO**”) who can be contacted by writing to the following e-mail address dpo@euricom.it for all matters relating to the protection of personal data.

3. Type of personal data processed

Data means any kind of information that concerns you and is referable to you.

Specifically, processing concerns:

- personal data relating to browsing

When browsing the Website the Company collects browsing data using cookies or other tracking technology to check the Website is functioning properly and allow you to use the services provided therein, to obtain - anonymous and aggregate - information about website visits and compile statistical analysis, as well as identify anomalies and/or abuses. For more information relating to the technology used to collect this data the Company invites you to read the provisions in point 5) below on Cookies.

- Data provided voluntarily by users

The Company also processes personal data voluntarily provided by you while interacting with the services provided by the Website, such as for example in the case of a request for information. Data provided voluntarily by users includes:

- e-mail addresses and any additional data provided when completing the request form to request information;
- name, surname, e-mail address and any other data provided in a *curriculum vitae* (such as for example education, professional experience, personal interests, pictures), including that revealing racial or ethnic origin and related to health to send your application;

(hereafter comprehensively “**Data**”).

The optional and voluntary sending of e-mail messages to the addresses indicated on this Website involves the acquisition of the sender's e-mail address as well as any other personal data provided in the message. This data is used for the sole purpose of identifying the sender and is not disseminated in any way.

4. Purposes of processing, legal bases and nature of the provision of Data

When browsing the Website and using the services provided therein your Data is collected for the following purposes:

- a. to allow browsing of the Website, obtain anonymous statistical information on its use, as well as check it is functioning properly and ascertain responsibility in the event of computer crimes

(hereafter “**Browsing the Website**”). The legal basis is found in the execution of the contract (article 6.1 b) GDPR Regulation), as well as the legitimate interests of the Company (article 6.1 f) GDPR Regulation);

- b. to check and fulfil the requests forwarded by you (hereafter “**Contacts**”). The legal basis can be seen in the execution of pre-contractual measures adopted at your request (article 6.1 b) GDPR Regulation);
- c. to evaluate professional profiles and start any selection process aimed at establishing an employment relationship or professional collaboration (hereafter “**Selection**”). The legal basis can be seen in the execution of pre-contractual measures (article 6.1 b) GDPR Regulation and article 111a of Legislative Decree no. 196/2003) and in the express consent with reference to any particular data provided (article 9.2 a) GDPR Regulation);
- d. to exercise and defend the rights of the Company in any venue, including judicial and administrative, in arbitration and/or mediation and conciliation procedures (hereafter “**Defence**”). The legal basis can be seen in the legitimate interest of the Company (article 6.1 f) GDPR Regulation).

With the exception of browsing data (collected automatically), provision of Data is necessary for the pursuit of the purposes referred to in the letters a), b), c) and d) above. Therefore, failure to provide the Data makes it impossible for the Company to fulfil your requests (for example, verifying and fulfilling any requests and starting the selection process).

5. Cookies

- What are cookies?

Cookies are small text files that websites visited by users send to their computers (usually to the browser) where they are memorised to be re-transmitted to the same sites on the next visit by the same users.

Cookies can be installed by websites visited by users (**first party cookies**) or by other sites (**third party cookies**). This happens because on the websites visited there can be elements (images, maps, sounds, links to webpages and other domains etc...) that reside on servers other than that of the websites visited. Based on the purpose, cookies are divided into two large macro-categories: **technical cookies** and **profiling cookies**.

Technical cookies are used for the sole purpose of carrying out the transmission of a communication over an electronic communications network or to the extent strictly necessary for the provider of an information society service explicitly requested by the subscriber or user to provide the service. They are not used for other purposes and are usually installed directly by websites visited by users. In particular these cookies allow for normal browsing and use of websites and browsing in accordance with a series of selected criteria in order to improve the service provided.

Prior consent of users is not required to install these cookies.

Technical cookies are assimilated to **analytics cookies**, when used directly by the website manager to gather information, in aggregate form, on user numbers and how people visit the website. These cookies allow the website manager to understand how users interact with the content of the website to optimise services.

Profiling cookies instead, are aimed at creating user profiles and are used to create profiles relating to users and are used to send advertising material in line with the preferences expressed by the same during browsing. **Prior consent of users is required** to install these cookies.

Based on their duration cookies are distinguished as **persistent**, which remain stored on user's devices until they expire, unless they are removed by users or as **session**, which disappear when the browser is closed and therefore have a limited duration.

- Types of cookies present on the Website

The Website uses **first party analytics cookies** to collect information on the use of the Website and to compile statistical analysis. The Website uses the service provided by the Piwik PRO Group, which does not allow for identification; data collected is processed in a completely aggregate and anonymous form.

Consent is not necessary to install these cookies. The characteristics of the aforementioned cookies are described in detail in the table below.

Cookie name	Type of cookie	Purpose	Storage period	Further information and links to information
_pk_id.<applD>.<domainHash>	First party analytics cookies	compile statistical analysis	13 months	https://help.piwik.pro/support/privacy/cookies-created-for-visitors-by-piwik-pro/
_pk_ses.<applD>.<domainHash>	First party analytics cookies	compile statistical analysis	30 minutes	https://help.piwik.pro/support/privacy/cookies-created-for-visitors-by-piwik-pro/
ppms_privacy_<applD>	First party analytics cookies	compile statistical analysis	12 months	https://help.piwik.pro/support/privacy/cookies-created-for-visitors-by-piwik-pro/
stg_traffic_source_priority	First party analytics cookies	compile statistical analysis	30 minutes	https://help.piwik.pro/support/privacy/cookies-created-for-visitors-by-piwik-pro/
stg_last_interaction	First party analytics cookies	compile statistical analysis	12 months	https://help.piwik.pro/support/privacy/cookies-created-for-visitors-by-piwik-pro/
stg_returning_visitor	First party analytics cookies	compile statistical analysis	12 months	https://help.piwik.pro/support/privacy/cookies-created-for-visitors-by-piwik-pro/

This Website could also contain links or references to access other websites. The Company has no power to control the cookies and/or tracking technology of other websites which this document does not apply to.

- **Managing cookie preferences and the nature of provision**

Upon first access to any page of the Website, the cookies mentioned in the previous point will be installed automatically given that prior consent is not required from users. In any case users are always allowed to:

- i. access information relating to the cookies used by the Website by clicking on the link "Privacy & Cookie Policy" located at the bottom of each page;
- ii. deactivate, activate or delete cookies using your browser settings in the ways described in the next point.

- **How to change your browser cookie settings**

Users can deactivate, activate or cancel cookies at any time by also using the settings on your browser. Having said that, the methods provided for the main browsers are shown below:

- Chrome: <https://support.google.com/chrome/answer/95647?hl=en>
- Firefox: <https://support.mozilla.org/it/kb/Attivare%20e%20disattivare%20i%20cookie>
- ME: <https://support.microsoft.com/en-us/products/windows?os=windows-10>
- Opera: <http://help.opera.com/Windows/10.00/it/cookies.html>
- Safari: <https://support.apple.com/it-it/HT201265>

It should be noted that as a result of this operation some functions on the Website may not be performed correctly and may not work optimally.

Users can also manage their preferences relating to cookies using the following link <http://www.youronlinechoices.com>.

6. Processing methods

Within the scope of the purposes indicated in point 4), processing of your data will take place mainly using electronic and automated means, as well as in paper form in compliance with the regulatory provisions on the processing of personal data, adopting the appropriate security measures. Processing of your personal data is managed by internal personnel at the Company (for example administrative and sales staff) specially licensed, trained and instructed to ensure adequate security and confidentiality, as well as to avoid the risk

of losing and/or destroying data and to prevent access by unauthorised people.

7. Communication and dissemination of Data

Your Data will not be disseminated. Within the limits strictly pertinent to the purposes indicated in point 4), your Data can be communicated to:

- subjects legitimated by law or regulation such as, by way of example and not limited to, the Public and Judicial Authorities;
- subjects who, as independent data controllers or data processors pursuant to article 28 of the GDPR Regulation are involved in Data processing (such as, by way of example and not limited to the company responsible for managing and maintaining the IT systems and Website).

An updated list of data processors can be requested from the Company by sending an e-mail to the following e-mail address infoedatabreach@euricom.it.

8. Data storage period

The Company stores Data for the period of time strictly necessary to fulfil the purposes for which the said data is collected. Except as expressly provided for in point 5) with reference to **Browsing the Website**, Data collected for the purposes of:

- **Contacts**, will be stored for the period necessary to process the request;
- **Selection**, will be stored for a period of one year from the date of collection;
- **Defence**, will be stored for the entire duration of the dispute and until the deadlines for any appeal and/or any limitation periods have elapsed;

without prejudice, however, to the right to withdraw consent for processing, which is the subject of this legal basis, the right to exercise the rights provided for in point 9) below including the right to object to processing as well as the fulfilment of specific conservation obligations provided for by law.

9. Rights of interested parties

With reference to the Data, interested parties have the right to request the Company in the manner indicated by the GDPR Regulation and without prejudice to the provisions and limitations referred to in Legislative Decree no. 196/2003 (Part I - Title I - Chapter III):

- to access, where applicable, i.e. the possibility to obtain confirmation as to whether or not personal data concerning you is being processed and information relating to: the purposes, the categories of personal data concerned, the recipients of the data, in particular recipients in third countries, where possible the envisaged storage period for the data; processing methods (article 15 GDPR Regulation);
- the rectification of inaccurate personal Data concerning you and to have incomplete personal data completed (article 16 GDPR Regulation);
- the erasure of Data for the reasons indicated (article 17 GDPR Regulation), such as for example when it is no longer necessary with reference to the purposes indicated above or it is not processed in compliance with the GDPR Regulation;
- the restriction of processing for the cases provided for (article 18 GDPR Regulation), such as in the case of contesting the accuracy of the data and the necessity to verify its correctness;
- portability, i.e. the right to receive the Data, in the foreseen cases (article 20 GDPR Regulation), in a structured, commonly used and machine-readable format and to transmit this data to another data controller;
- to object to processing in the presence of justified reasons or in the event the same is used to send advertising material, for direct marketing or to carry out market research (article 21 GDPR Regulation);
- not to be subjected to a decision based solely on automated processing, including profiling which produces legal effects concerning it or that significantly affects your person in a similar way unless it is based on explicit consent or authorised by European Union law or is necessary for the conclusion or fulfilment of a contract.

In the case of processing based on consent the right to revoke it at any time is also recognised without prejudice to the lawfulness of the processing carried out before the revocation.

All the rights listed above can be exercised by you by sending the Company an e-mail to the following e-mail address infoedatabreach@euricom.it or by registered mail to the Company address: Via Stazione no. 119, Valle Lomellina (PV).

10. Complaints

In the event users believe that Data processing violates the provisions contained in the GDPR Regulation,

users have the right to lodge a complaint with the Italian Data Protection Authority, in compliance with article 77 of the same GDPR Regulation.

11. Transfer of data abroad

Your Data is stored on servers located in the European Union. In the event of the transfer of data abroad the Company undertakes to ensure the transfer of Data in these countries takes place in compliance with the provisions of the GDPR Regulation and specifically, in the presence of adequate guarantees (adequacy decisions, standard contractual clauses approved by the European Commission etc...).

12. If you are under the age of 18

The Website is aimed at a general audience and not at minors. The Company does not knowingly collect data from users who according to the laws of their country are considered minors.

13. Changes to this Policy

This Privacy Policy is subject to periodic changes aimed at guaranteeing an ever-greater protection of your Data. When you access the Website, we therefore recommend to periodically check the text of this policy.

Euricom S.p.A.