

## **Policy Summary**

- We use cookies on our website – we use them to make our websites easier to use and to find out what journey’s our users take.
- Where we collect personal information (for example e-mail addresses) we will always use these responsibly by only sending you information we think you want to see.
- When email marketing we will always provide an unsubscribe option.
- Please be aware that we aren’t responsible for any external links to websites outside of DENA GROUP srls and to check their own Privacy Policy.

DENA GROUP srls cares about your privacy and are committed to protecting your personal information in accordance with fair information practices, GDPR and applicable data privacy laws.

The policy sets out the different areas where user privacy is concerned and outlines the obligations & requirements of the users, the website and website owners. Furthermore, the way this website processes, stores and protects user data and information will also be detailed within this policy.

### **1. Scope**

This Privacy Policy explains how we collect and use personal information. Personal Information means any information relating to an identified or identifiable natural person; one who can be identified, directly or indirectly, by reference to an identifier such as name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. We collect personal information in a variety of ways through our normal business activities, both online and offline. This includes, for example, when you place orders or purchase products or services, enter into agreements or communicate with us, or visit and use our websites. We also receive personal information from our customers in order to perform services on their behalf.

### **2. Categories of Personal Information**

Personal information that we may collect and process includes:

- Contact Information that allows us to communicate with you, such as your name, job title, age and prefix, username, mailing address, telephone numbers, email address or other addresses that allow us to send you messages, company information and registration information you provide on our website.
- Relationship Information that helps us do business with you, such as the types of products and services that may interest you, contact and product preferences, languages, creditworthiness, marketing preferences and demographic data.

- Transactional information about how you interact with us, including purchases, inquiries, customer account information, order and contract information, delivery details, billing and financial data, details for taxes, transaction and correspondence history, and information about how you use and interact with our websites.
- Security and Compliance Information that helps us to secure our interests, including information for conflict checks, fraud prevention and internal verification, as well as information necessary for the security of our premises, such as visual recordings.
- Our products may collect system and event information relating to their setup, configuration and operation, as well as information collected by our products in their ordinary course of operation. This information may include sensor data, equipment data, data regarding building spaces, energy usage data, fault data, event data, environmental data, and other internal or external data as well as product usage information and product performance data. In some circumstances, this information may be Personal Data. The nature and extent of the information collected by our products will vary based on the type and function of the product and the type of services for which they are used, subject to applicable laws.

### **3. Legal bases for Processing**

- The performance of a contract with our customers and suppliers.
- The legitimate interests of DENA GROUP srls which are our usual business activities.

### **4. Purposes of Processing**

- Fulfilling your orders for products or services and related activities, such as product and service delivery, customer service, account and billing management, support and training, product update and safety related policies, and to provide other services related to your purchase.
- Managing our contractual obligations and your ongoing relationship with us, including interacting with you, analysing and improving the products and services we offer, informing you about our products or services, as well as special offers and promotions.
- Ensuring the security of our websites, networks and systems, and premises, as well as protecting us against fraud.
- Managing our everyday business needs, such as payment processing and financial account management, product development, contract management, website administration, fulfilment, corporate governance, audit, reporting and legal compliance.

### **5. Recipients of Personal Information**

- Third Parties: We may use third parties to provide or perform services and functions on our behalf. We may make personal information available to these third

parties, to perform these services and functions. Any processing of that personal information will be on our instructions and compatible with the original purposes and in accordance with GDPR Regulations.

- **As Required by Law:** We may also make personal information concerning individuals available to public or judicial authorities, law enforcement personnel and agencies as required by law, including to meet national security or law enforcement requirements, and including to agencies and courts in the countries where we operate. Where permitted by law, we may also disclose such information to third parties (including legal counsel) when necessary for the establishment, exercise or defence of legal claims or to otherwise enforce our rights, protect our property or the rights, property or safety of others, or as needed to support external audit, compliance and corporate governance functions.
- **Mergers & Acquisitions:** Personal information may be transferred to a party acquiring all or part of the equity or assets of DENA GROUP srls or its business operations in the event of a sale, merger, liquidation, dissolution, or other.
- **Affiliates:** We may also transfer and share such information to DENA GROUP srls affiliates in compliance with applicable law.

## **6. Retention**

We will retain your personal information as long as necessary to achieve the purpose for which it was collected, usually for the duration of any contractual relationship and for any period thereafter as legally required or permitted by applicable law.

## **7. Protection of Personal Information**

Security measures for protecting personal information: We apply appropriate technical, physical and organisational measures that are reasonably designed to protect personal information against accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access, and against other unlawful forms of processing. Access to personal information is restricted to authorised recipients on a need-to-know basis. We will also use enhanced security measures when processing any sensitive personal information.

## **8. Our websites**

This website and its owners take a proactive approach to user privacy and ensure the necessary steps are taken to protect the privacy of its users throughout their visiting experience. This website complies to all relevant national laws and requirements for user privacy.

- **Cookies:** This website uses cookies to better the users experience while visiting the website. Where applicable this website uses a cookie control system allowing the user on their first visit to the website to allow or disallow the use of cookies on their computer / device. This complies with recent legislation requirements for websites to obtain explicit consent from users before leaving behind or reading files such as cookies on a user's computer / device.

Cookies are small files saved to the user's computer / device hard drive that track, save and store information about the user's interactions and usage of the website. This allows the website, through its server to provide the users with a tailored experience within this website.

Users are advised that if they wish to deny the use and saving of cookies from this website on to their computers hard drive they should take necessary steps within their web browsers security settings to block all cookies from this website and its external serving vendors.

Web Tracking: This website uses tracking software to monitor its visitors to better understand how they use it. This software is provided by Google Analytics which uses cookies to track visitor usage. The software will save a cookie to your computer / devices hard drive in order to track and monitor your engagement and usage of the website, but will not store, save or collect personal information. You can read Google's privacy policy here for further information  
<http://www.google.com/privacy.html>

Other cookies may be stored to your computer / devices hard drive by external vendors when this website uses referral programs, sponsored links or adverts. Such cookies are used for conversion and referral tracking and typically expire after 30 days, though some may take longer. No personal information is stored, saved or collected. Most internet browsers accept cookies automatically, but you can change the settings of your browser to erase cookies or prevent automatic acceptance if you prefer. These links explain how you can control cookies via your browser - remember that if you turn off cookies in your browser then these settings apply to all websites not just this one:

- Internet Explorer <http://support.microsoft.com/kb/278835>
- Chrome: <http://support.google.com/chrome/bin/answer.py?hl=en-GB&answer=95647>
- Safari: <http://docs.info.apple.com/article.html?path=Safari/5.0/en/9277.html>
- Firefox: [http://support.mozilla.org/en-US/kb/ Enabling%20and%20disabling %20cookies](http://support.mozilla.org/en-US/kb/Enabling%20and%20disabling%20cookies)
- Email Newsletter: This website operates an email newsletter program, used to inform subscribers about products and services supplied by this website. Users can subscribe through an online automated process should they wish to do so but do so at their own discretion. Some subscriptions may be manually processed through prior written agreement with the user.

Subscriptions are taken in compliance with national Spam Laws and all personal details relating to subscriptions are held securely and in accordance with GDPR and national data protection law.

No personal details are passed on to third parties nor shared with companies / people outside of the company that operates this website. Under the GDPR and national data protection law you may request a copy of personal information held about you by this website's email newsletter program. If you would like a copy of

the information we have on file about you as an individual, please email our Data Protection Supervisor – see Section 11 How to Contact Us.

Email marketing campaigns published by this website or its owners may contain tracking facilities within the actual email. Subscriber activity is tracked and stored in a database for future analysis and evaluation. Such tracked activity may include; the opening of emails, forwarding of emails, the clicking of links within the email content, times, dates and frequency of activity. This information is used to refine future email campaigns and supply the user with more relevant content based around their activity. Subscribers are given the opportunity to un-subscribe at any time through an automated system. This process is detailed at the footer of each email campaign sent by our mailing system.

- **External Links:** Although this website only looks to include quality, safe and relevant external links, users are advised adopt a policy of caution before clicking any external web links mentioned throughout this website. The owners of this website cannot guarantee or verify the contents of any externally linked website despite their best efforts. Users should therefore note they click on external links at their own risk and this website and its owners cannot be held liable for any damages or implications caused by visiting any external website/page links.

- **Social Media Platforms:** Communication, engagement and actions taken through external social media platforms that this website and its owners participate on are custom to the terms and conditions as well as the privacy policies held with each social media platform respectively. Users are advised to use social media platforms wisely and communicate / engage upon them with due care and caution in regard to their own privacy and personal details. This website nor its owners will ever ask for personal or sensitive information through social media platforms and encourage users wishing to discuss sensitive details to contact them through primary communication channels such as by telephone or email. This website may use social sharing buttons which help share web content directly from web pages to the social media platform in question. Users are advised before using such social sharing buttons that they do so at their own discretion and note that the social media platform may track and save your request to share a web page respectively through your social media platform account.

## **In Summary**

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- Where we collect personal information (for example e-mail addresses) we will always use these responsibly by only sending you information we think you want to see. • When email marketing we will always provide the opt-out option.

- Please be aware that we aren’t responsible for any external links to websites outside of and to check their own Privacy Policy.

## **9. Your Rights**

You may request to access, rectify, or update your inaccurate or out-of-date personal information by contacting our Data Protection Supervisor. To the extent of

applicable law, you may have the right to request erasure of your personal information, restriction of processing as it applies to you, object to processing and the right to data portability. You may also have the right to lodge a complaint with a supervisory authority.

## **10. Consent and Withdrawal of Consent**

By providing personal information to us, you understand and agree to the collection, processing, transfer and use of such information as set forth in this Privacy Policy. Where required by applicable law we will ask your explicit consent.

You may always object to the use of your personal information for direct marketing purposes or withdraw any consent previously granted for a specific purpose, free of charge by clicking on relevant links on our websites, following the directions contained in an email or by contacting our Data Protection Supervisor.

## **11. How to contact us**

If you would like to communicate with us regarding privacy and personal data issues, require a copy of the data held for you, a full copy of our Data Protection Policy or have questions, comments or complaints, please contact:

- [info@denaspirazioni.com](mailto:info@denaspirazioni.com)

- tel. +39.0872.320.134

## **12. Modifications to our Privacy Policy**

We reserve the right to change, modify, and update this Privacy Policy at any time. Please check periodically to ensure that you have reviewed the most current notice.