

Update:
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Privacy policy

General information

For **Haltadefinizione S.r.l.** (hereinafter "Data Controller") the privacy and security of personal data are really important, for this reason we collect and manage your personal data with the utmost care and take measures aimed at their security.

Below you will find information on the processing of data by the Data Controller pursuant to Article 13 of EU Regulation 2016/679 (hereinafter, "GDPR").

The data controller

Haltadefinizione S.r.l., Corso Canalchiaro, 26 - 41121 Modena, Italy
Tel. 0592930090 - Email: info@haltadefinizione.com
The list of Data Processors is available from the Data Controller.

Personal data processed

The categories of personal data that the Data Controller collects and processes while browsing the site are as follows:

1. Personal and contact data collected following the compilation of the contact forms on the website;
2. Data and / or information concerning and relating to the acquisitions and payments / transactions made by the Customer in relation to the products presented on the site;
3. Data necessary for invoicing (Tax Code / VAT number);
4. Personal data collected for sending newsletters;
5. Data collected through interaction with the website (e.g. Cookies).

Purpose and legal basis of the processing

The Data Controller collects and processes personal data for the following purposes:

1. subject to express consent, **management of requests for information and / or assistance** using the personal data entered in the **Contact form**;
2. for preparatory, instrumental and preparatory activities for the activation and management of the **contractual and pre-contractual relationship**, relating to the purchase of the products presented on the site, including service or support communications following any requests from the Customer;
3. **for legal purposes, administrative and accounting management, complaints and litigation** (including in order to ensure the exercise of the rights of the Data Controller or the Data Processor(s), for example the right of defense in court);
4. subject to express consent, we may use the personal data provided for **commercial communications** on our products and services and / or our group in order to update users on news, offers, promotions and other communications regarding company activities and initiatives (**newsletter**);
5. **through legitimate interest and / or prior consent** we process personal data relating to **navigation**, to the extent strictly necessary and proportionate regarding cookies.

Providing personal data for these activities is absolutely optional, but in the absence of them it will not be possible for the Data Controller to carry out the activities in question.

Processing methods

The personal data provided will be subject to processing operations in compliance with the aforementioned legislation and the confidentiality obligations that inspire the activity of the Data Controller. The data will be processed with IT tools of the Data Controller and / or shared with other subjects belonging to the same corporate group, in compliance with the appropriate security measures pursuant to Article 5 paragraph 1 letter f) of the GDPR.

The processing is limited to the following operations and in the following ways:

- collection of data from the interested party;
- recording and processing on computerized support;
- organization of archives in a mainly automated form.

The personal data will not be disseminated, while they will be or may be communicated to subjects, public or private, who operate within the scope of the purposes described above.

Communication and access to data

Personal data will be processed by the internal staff of the Data Controller and / or belonging to the same corporate group, specifically instructed and authorized to process.

Personal data will also be transmitted to third parties that we use to provide our services or carry out our activities; these subjects have been adequately selected and offer a suitable guarantee of compliance with the rules on the processing of personal data. These subjects have been designated pursuant to art. 28 GDPR and carry out their activities according to the instructions given by the Data Controller and under its control.

Extra-EU data transfer

In the event that the Data Controller should make transfers of personal data to third countries, all the measures required by the relevant legislation will be adopted..

Data retention

We keep personal data for a limited period of time, which differs depending on the type of processing.

Personal data are stored in compliance with the terms and criteria specified below:

1. **data related to user requests:** useful data will be kept until the request is met;
2. **data related to purchases:** the data will be kept for the entire duration of the contract and even beyond the ten-year limitation period from the termination of the relationship to fulfill legal obligations as well as for judicial protection purposes;
3. **data used for commercial communication activities:** by virtue of the continuous relationship, the periodicity of the communication, the constant updating of our services and initiatives, the data will be kept until the revocation of the consent previously expressed; in this regard, we remind you that, if you are no longer interested in receiving our informative and promotional material, you will always be able to revoke your consent previously expressed, through our opt-out mechanism. It is the legitimate interest of the Data Controller to send to those who are already Customers commercial communications relating to services and products of the Data Controller similar to those it has already used, unless consent is revoked (Article 7 GDPR);
4. **personal data relating to navigation,** the data will be processed to a strictly necessary and proportionate extent to ensure the security of networks and information: more precise indication in the cookie policy.

Rights of data subjects

According to the provisions of the GDPR, the Data Controller guarantees the following rights:

1. obtain confirmation as to whether or not personal data concerning you are being processed and in this case, obtain access to personal data (Right of access art. 15);
2. obtain the correction of inaccurate personal data concerning you without undue delay (Right of Rectification art. 16);
3. obtain the cancellation of personal data concerning you without undue delay, the Data Controller has the obligation to delete your personal data without undue delay, if certain conditions are met (Right to be forgotten art. 17);

4. obtain the limitation of processing in certain cases (Right to limitation of processing art. 18);
5. receive in a structured format, commonly used and readable by automatic device, the personal data you have provided to us and possibly be able to transmit them to another Data Controller (Right to data portability art. 20);
6. oppose at any time, for reasons related to your particular situation, to the processing of personal data concerning you (Right to object article 21);
7. receive without undue delay communication of the violation of personal data suffered by the Data Controller and / or by the Data Processors if such violation represents a threat to the rights and freedoms of the data subject (Art. 34);
8. revoke the consent expressed at any time (Conditions for consent art. 7).

To ensure that the data of our users are not violated or used unlawfully by third parties, before accepting your request to exercise one of the rights indicated, we will ask you for some information to be sure of your identity.

Complaints

Where applicable, the data subject may exercise the above rights, by post or e-mail. The Data Controller reserves the right to verify the identity of the data subject before taking further action based on his request. For any complaints, the data subject also has the right to lodge a complaint with the Italian Supervisory Authority for the protection of personal data.

Changes to this policy

The Data Controller reserves the right to make, occasionally and at its own discretion, changes to this Policy, giving notice to the Users in the most appropriate manner based on the specific circumstances, also by sending the information through notices and / or notifications within the platform.

