

Novaref S.p.A.

**Sede legale, direzione e stabilimento**

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## PRIVACY POLICY

On this page, the management procedures with which the information contained in the website [www.novaref.it](http://www.novaref.it) are described, with particular reference to the processing of personal data of the users who access this website. This information memo is also provided in accordance to Art. 13 of the Legislative Decree no. 196/2003 – Personal Data Protection Regulation and the European guideline no. 679/2016 (hereinafter referred to as ‘GDPR’) - for those who access the website. This information memo is solely provided in regards to the website and not to other websites accessed by the user through *links*.

## THE DATA PROCESSING CONTROLLER

After having consulted this website, data regarding identified or identifiable persons may be processed. The “controller” of such data processing is Novaref S.p.A., with registered office in Viale del Lavoro n. 7, Colognola ai Colli (hereinafter referred to as “**Company**”).

## LOCATION OF DATA PROCESSING

Any data processing operation connected with the Web services provided on this website shall be carried out at our offices, solely by employees, consultants, associates or partners in charge of the processing of data, or by persons entrusted with occasional maintenance operations. No data deriving from the Web service shall be disclosed or disseminated.

## CATEGORIES OF DATA PROCESSED

### Web Surfing Data

The information systems and software procedures implemented for the operation of this website may acquire, during the course of their normal execution, personal data, the transmission of which is implied in the use of the Internet communication protocols.

Such information is not collected with the purpose of being associated to identified data subjects; however, due to its nature, such information could permit the identification of users, through processing operations and associations with data held by third parties.

This category of data includes: IP addresses or domain names of the computers handled by users who access the website, URI (Uniform Resource Identifier) notation addresses of the resources requested, the time at which the request is submitted, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the state of the reply given by the server (sent, error, etc.), as well as other parameters relating to the user’s operating system and information environment.

This data is only used to retrieve anonymous statistical information on the use of the website and to control that it works properly. Such data will, therefore, be deleted immediately after being processed. Such data may be used to ascertain any liability in the case of any alleged computer crime to the detriment of the website. Except in the case of an alleged computer crime, for the time being data concerning the access to the website shall be kept for no more than seven days.

### Data Voluntarily Supplied by the User

The optional, unambiguous, and voluntary dispatch of e-mail to the addresses specified on this website shall imply the subsequent acquisition of the sender’s e-mail address, which is necessary for a reply to any request, as well as the acquisition of other personal data, if any, contained in the email.

### Data concerning resumes sent voluntarily to an Ad Hoc E-mail Address

Any personal data contained in the resumes sent to e-mail addresses indicated in the website shall be used for the sole purpose of the assessment of candidates’ profiles and their selection. Should a candidate not successfully pass the selection, his/her data shall be deleted within seven days. One can contact the “**Company**” to check on their personal data and to request that it be supplemented, updated, corrected, or to exercise any other rights provided for by the GDPR.

The eventual forwarding of sensitive data (relating in particular to: the data subject’s racial or ethnic origin, religious or other beliefs of a similar nature, political opinions, membership of political parties, trade unions, or other religious, philosophical, political or trade union associations or organisations, as well as data relating to the data subject’s physical or mental health or condition or sexual life) shall provoke the immediate deletion of such data, unless the data subject gives his/her written consent for processing on behalf of the “**Company**”. We urge

Società soggetta all’attività di direzione e coordinamento del socio unico Vetrerie Riunite S.p.A.  
con sede in Colognola ai Colli (VR) – Italia – Via Calcinese 60. C.F. 041246990961  
Capitale sociale EURO 1.278.859,56 i.v. dal socio unico Vetrerie Riunite S.p.A.



you not to send us any document containing your personal information if you do not wish that the same be processed in the manner previously described above. Any request sent to our attention without your consent for the processing of your personal data, shall not be taken into consideration .

## **COOKIES**

No personal data of the users is collected by the website through the use of cookies. Such files will be stored in the memory of the user's computer to facilitate any subsequent access to our website. Cookies are not used to transmit personal information. Persistent cookies and user tracking systems are not used.

The use of the so-called session cookies (which are not stored permanently in the user's computer or which are lost upon the closing down of the browser) is strictly limited to the transmission of session identification data (consisting of casual numbers generated by the server) necessary to permit the safe and efficient exploration of the website. Reception of this website's cookies can be interrupted by the user at any time by changing his/her browser settings.

## **OPTIONAL DATA SUPPLY**

Apart from that which has been specified above with regard to the Web surfing data, the user shall be free to supply his/her personal data in order to solicit the sending of informative material or apply for any professional position. If the user does not supply his/her personal data, it may be impossible for him/her to obtain the requested information or for the submitted application to be evaluated.

## **PROCEDURES AND OBJECTIVES OF DATA PROCESSING**

Personal data will either be processed in paper format or by automated means for as long as is strictly necessary to achieve the objectives for which such data was collected.

Aside from what has been specified above regarding Web surfing, any personal data, supplied by a user who sends a request for information or an application for professional positions to the email addresses published on this website, shall be used for the sole purpose of sending the information requested or evaluating the application(s) submitted. Personal data shall not be disclosed to any third parties, unless such disclosure is required by law or is strictly necessary for the fulfilment of the submitted request(s).

## **LEGAL FRAMEWORK OF DATA PROCESSING AND PRESERVATION (TIME LIMITS)**

The legal framework of the data processing in question is the implementation of the contract for the service of surfing the website of the "**Company**" and the implementation of all inherent legal obligations. Aside from what was already specified regarding web surfing data, personal information received by means of the data collection form present on the website, are preserved for the time necessary to handle the requests received. This data, at a later time, is cancelled, unless a contact/connection is established which shall be subject to further information notices.

## **RIGHTS OF THE INTERESTED PARTIES**

In relation to the aforementioned data processing, you shall be able to exercise your rights highlighted in art. 13 GDPR 679/16, more clearly stated in articles 15-16-17-18-20-21 and 22 GDPR 679/16. Specifically you will have the right to:

- 1) Obtain the confirmation of the existence of your personal data, even if not yet registered, and their communication (to you) in an intelligible format.
- 2) Ask the Controller of the data access to your personal data as well as the portability of the same.
- 3) Obtain an update and the rectification of the data as well as, when necessary, the integration of the same.
- 4) Oppose, fully or in part: (a) the processing of your personal data, for legitimate motives, even though pertinent to the objective of the data collection; (b) the processing of your personal data for the purposes of sending advertising materials, direct mail, market research questionnaires or marketing communications.
- 5) Obtain the cancellation and the transformation, anonymously, or the interruption of the data processed in violation of current legislation, including those (data) that have no need to be preserved in relation to the objectives of the data collection and processing.
- 6) Cancel consent at any moment without jeopardizing the lawfulness of the processing based on the consent given before the cancellation of the same, in cases foreseen by current legislation.
- 7) Submit a complaint to Supervisory Authorities.
- 8) Obtain a certified document stating that the actions inherent to points 4 and 6 above were brought to light, to those whom the data was communicated and/or disseminated, except in cases where this compliance is impossible or entails means manifestly disproportionate to the protected right.

In any case, you may exercise your rights by sending a request to the following e-mail address: [privacy\\_no@novaref.it](mailto:privacy_no@novaref.it).