

WEB PRIVACY POLICY

Subject: Information statement on the processing of your personal data (Art. 13 of EU Regulation 2016/679)

In accordance with the provisions of Italian Legislative Decree 196 of 30 June 2003 (the "Italian Data Protection Act") and Regulation (EU) 2016/679 on data protection (GDPR), please note that your personal data will be processed by the Data Controller.

The following definitions are given for the sake of clarity:

"Processing" means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

"Personal Data" means any information relating to an identified, or identifiable, natural person (the "Data Subject"). An identifiable natural person is a person who can be identified, directly or indirectly by reference of an identifier such as: a 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.

ACCEPTING THIS PRIVACY POLICY

Read this privacy policy carefully. By navigating our website and giving consent where required (e.g. when sending a form), the user agrees to be bound by this privacy policy.

1. IDENTITY AND CONTACT INFORMATION OF THE DATA CONTROLLERS (hereinafter "Controller")

Company name: Ambiente Lavoro Salute srl
Address: Via Cecati, 13/G 42123 Reggio Emilia - ITALY
VAT no. 01873190357
E-mail: info@ambientelavorosalute.com
Telephone: +39 0522 326285

Company name: ALS Project srl
Address: Via Cecati, 13/G 42123 Reggio Emilia - ITALY
VAT no. 02694470358
E-mail: info@ambientelavorosalute.com
Telephone: +39 0522 326285

Company name: ALS Med srl
Address: Via Cecati, 13/G 42123 Reggio Emilia - ITALY
VAT no. 02694470358
E-mail: info@ambientelavorosalute.com
Telephone: +39 0522 326285

DATA SUBJECTS: The persons who enter their data on our website www.als-project-usa.com

2. OBJECT, PURPOSES AND LEGAL BASIS FOR THE DATA PROCESSING

a. Purposes and Object: Respond effectively to your requests submitted via our web form

Data provision methods: information web form

Type of data: all personal data provided in the mentioned form

Legal basis for the data processing (lawfulness): This form of processing is covered by the lawful processing operations mentioned in Article 6 (1b) of Regulation (EU) 2016/679 on data protection

Categories of persons who may receive the personal data – Recipients –:

Your Personal Data may be made accessible, for the above purposes or to comply with legal obligations or perform activities that are conducive to the mentioned purposes, to:

- employees of the Data Controller, who may also be especially appointed and authorised as data processors for specific data processing operations;
- third-party companies or other third parties working on behalf of the Data Controller, in their capacity as external data processors especially appointed and authorised for specific data processing operations.

Agreements with the latter only allow data processing that is strictly necessary and ensure the confidentiality, security and integrity of the data.

Categories of External Data Processors that may be appointed:

- Persons who perform technical, organisational, professional, and operating activities on behalf of the Controller in order to achieve the stated purposes.
- Persons who perform computer and legal activities on behalf of the Controller in order to achieve the stated purposes.

Personal data may be transferred to independent Data Controllers such as public audit or supervisory authorities.

Objection to data processing: Refusal to provide personal data or objection to its processing, which is a right of the data subject, will result in the impossibility of any relationship.

The data subject may object to the processing using the contact details given in point 1.

The data will not be circulated for any reason nor will the data be used for purposes other than the ones mentioned.

b. **Purposes and Object: concluding the purchase of products offered on our website**

Data provision methods: web form, which must be filled out to complete the purchase

Type of data: all personal data provided in the mentioned form

Legal basis for the data processing (lawfulness): This form of processing is covered by the lawful processing operations mentioned in Article 6 (1b) of Regulation (EU) 2016/679 on data protection

Categories of persons who may receive the personal data – Recipients –:

Your Personal Data may be made accessible, for the above purposes or to comply with legal obligations or perform activities that are conducive to the mentioned purposes, to:

- employees of the Data Controller, who may also be especially appointed and authorised as data processors for specific data processing operations;
- third-party companies or other third parties working on behalf of the Data Controller, in their capacity as external data processors especially appointed and authorised for specific data processing operations.

Agreements with the latter only allow data processing that is strictly necessary and ensure the confidentiality, security and integrity of the data.

Categories of External Data Processors that may be appointed:

- Persons who perform technical, organisational, professional, and operating activities on behalf of the Controller in order to achieve the stated purposes.
- Persons who perform computer, legal and administrative activities – including accounting, financial, insurance, technical consulting, managerial, assessment, control and auditing activities – on behalf of the Controller in order to achieve the stated purposes.

Personal data may be transferred to independent Data Controllers such as Banks, Insurance Companies and Public Audit or Supervisory Authorities.

Objection to data processing: Refusal to provide personal data or objection to its processing, which is a right of the data subject, will result in the impossibility of any commercial relationship.

The data subject may object to the processing using the contact details given in point 1.

The data will not be circulated for any reason nor will the data be used for purposes other than the ones mentioned.

- c. **Purposes and Object:** The e-mail address you provided will be processed for soft-marketing purposes – such as advertising and promotion of services similar to the ones you showed an interest in through the use of a specific product/service of ours – only if it is in the legitimate interest of both parties. The activity will take place by e-mail and its frequency will be low.

Data provision methods: web form, which must be filled out to complete the purchase

Type of data: e-mail address provided in the purchase web form

Legal basis for the data processing (lawfulness): This data processing operation is lawful within the meaning of article 130, paragraph 4 of Italian Legislative Decree no. 196 of 30 June 2003 “Italian Data Protection Act”, supplemented with the amendments introduced by Italian Legislative Decree no. 101 of 10 August 2018

Categories of persons who may receive the personal data – Recipients –:

Your Personal Data may be made accessible, for the above purposes or to comply with legal obligations or perform activities that are conducive to the mentioned purposes, to:

- employees of the Data Controller, who may also be especially appointed and authorised as data processors for specific data processing operations;
- third-party companies or other third parties working on behalf of the Data Controller, in their capacity as external data processors especially appointed and authorised for specific data processing operations.

Agreements with the latter only allow data processing that is strictly necessary and ensure the confidentiality, security and integrity of the data.

Categories of External Data Processors that may be appointed:

- Persons who perform technical, organisational, professional, and operating activities on behalf of the Controller in order to achieve the stated purposes.
- Persons who perform computer and legal activities on behalf of the Controller in order to achieve the stated purposes.
- Persons who perform commercial and marketing activities on behalf of the Controller in compliance with the limitations and restrictions mentioned in the preceding paragraphs.

Personal data may be transferred to independent Data Controllers such as public audit or supervisory authorities.

Objection to data processing: The data subject may object to the processing of his or her data at any time by sending an e-mail to the Controller’s e-mail address as provided in paragraph 1 or through the opt-out option found in every e-mail message. The withdrawal of consent will not affect the lawfulness of processing before its withdrawal.

The data subject may object to the processing using the contact details given in point 1.

The data will not be circulated for any reason nor will the data be used for purposes other than the ones mentioned.

- d. **Purposes and Object:** The contact data provided by the user will be used for marketing activities, to recommend products or services offered by ALS Project srl. The activity will only be aimed at those who gave their consent along with their contact details, and its frequency will be low.

Data provision methods: web form, which must be filled out to complete the purchase

Type of data: e-mail address provided in the purchase web form and other contact details entered by the user.

Legal basis for the data processing (lawfulness): The processing of your personal data is lawful as a consequence of you having freely given your express consent, within the meaning of article 6 (1a) of EU Regulation 2016/679, by placing a check mark in the specific box before sending the web form.

Categories of persons who may receive the personal data – Recipients –:

Your Personal Data may be made accessible, for the above purposes or to comply with legal obligations or perform activities that are conducive to the mentioned purposes, to:

- employees of the Data Controller, who may also be especially appointed and authorised as data processors for specific data processing operations;
- third-party companies or other third parties working on behalf of the Data Controller, in their capacity as external data processors especially appointed and authorised for specific data processing operations.

Agreements with the latter only allow data processing that is strictly necessary and ensure the confidentiality, security and integrity of the data.

Categories of External Data Processors that may be appointed:

- Persons who perform technical, organisational, professional, and operating activities on behalf of the Controller in order to achieve the stated purposes.
- Persons who perform computer and legal activities on behalf of the Controller in order to achieve the stated purposes.
- Persons who perform commercial and marketing activities on behalf of the Controller in compliance with the limitations and restrictions mentioned in the preceding paragraphs.

Personal data may be transferred to independent Data Controllers such as public audit or supervisory authorities.

Objection to data processing: The data subject may object to the processing of his or her data at any time by sending an e-mail to the Controller's e-mail address as provided in paragraph 1 or through the opt-out option found in every e-mail message. The withdrawal of consent will not affect the lawfulness of processing before its withdrawal.

The data subject may object to the processing using the contact details given in point 1.

The data will not be circulated for any reason nor will the data be used for purposes other than the ones mentioned.

3. DURATION OF THE DATA PROCESSING

Personal data are kept for 10 years from the date of termination of the relationship or, in case of regulatory changes or judicial orders, as may be necessary for exercising a legal right by both parties.

The data is periodically checked for obsolescence.

4. PERSONAL DATA PROCESSING TOOLS AND LOGIC

With respect to the purposes referred to herein, processing takes place with the help of manual, IT and electronic instruments with logics strictly correlated with the above-mentioned purposes and, in any event, in such a manner so as to guarantee the security and confidentiality of said data.

5. RIGHTS OF THE DATA SUBJECT

All the rights mentioned below may be exercised by sending a request to the Controller at the contact details specified in paragraph 1 at the beginning of the document.

- Right to obtain access to your personal data
- Right to obtain the rectification/erasure/restriction of processing of your personal data
- Right to object to the processing of your personal data
- Right to receive the complete list of data processors
- Right to have your personal data kept in a structured, commonly used and readable format
- Right to file a complaint with a supervisory authority, such as the Privacy Watchdog, at the contact details provided in the following link https://www.garanteprivacy.it/web/garante-privacy-en/home_en

There is no automated decision-making process, including the profiling pursuant to Article 22, paragraphs 1 and 4 of the European General Data Protection Regulation 2016/679.

6. TRANSFER OF DATA TO THIRD COUNTRIES

Your Personal Data will be processed within the European Union and kept in servers located within the European Union; the data may also be processed and kept in non-EU countries when an adequate level of protection is ensured. The protection level is said to be adequate where the European Commission has decided that the third country ensures an adequate level of protection or where the Controllers and Processors involved in the third country have provided adequate assurance through a legally binding contract or instrument including standard data protection clauses (article 46, paragraph 2 (c and d) of EU Regulation 2016/679 on Personal Data Protection). This is mentioned solely in compliance with confidentiality obligations and the purposes herein described. Said guarantees are available for viewing at the headquarters of ALS Project srl in Reggio Emilia or provided by e-mail. Requests can be sent using the contact details given in point 1.

7. MINORS

We are aware of the importance of protecting the privacy of minors. This website is not designed for nor is it aimed at users under 18 years of age.

8. USE OF LINKED WEBSITES

We disclaim any responsibility or involvement relating to the access and use of external websites that we link to.
