

## Privacy Policy

\*updated to Reg UE 2016/679 (GDPR)

This section describes the methods of processing personal data carried out through this website with reference to the processing of personal data of users who consult it an/or interact with the web services provided through the website. Following consultation of this website or the request for web services, data relating to identified or identifiable persons may be processed.

### Datencontroller OWNER OF DATA PROCESSING

Owner of the data processing carried out through the site is:

TopControl GmbH  
Enzenbergweg 24 A  
39018 Terlan (BZ), Italien

### TYPES OF DATA PROCESSED, PURPOSE AND LEGAL BASIS OF THE TREATMENT

#### Data provided voluntarily by the user for Service requested

The compilation by the user of specific formats on the site with the insertion of personal data to receive services/information, make requests, send job applications or receive further services of the site and the optional, explicit and voluntary sending of e-mails to the addresses indicated on the site by the user involves the subsequent acquisition of such data in order to provide the requested services.

Some of the data requested in the formats are necessary to provide the requested service and are indicated with an asterisk. Other data are merely optional and may be entered by the user to allow a more complete and personalized service or, with prior consent in the cases provided for by current legislation, to analyze personal interests and information or habits or consumption choices. Failure to provide the mandatory data does not allow the continuation and therefore the performance of the requested service. Failure to provide the optional data may result in the provision of an incomplete service and the impossibility of carrying out the optional activities indicated.

In particular:

**“Newsletter”-section: The data entered are registered to send newsletters about TopControl and its products.**

The purposes of the processing for such data are therefore, depending on the services requested:  
– communication with the customer regarding the requested service. The legal basis of the processing is therefore the fulfillment of contractual obligations (requests) of the requesting user and for optional services the consent of the data subject.

#### Third parts data entered freely by the user

Where the user sends, in requests for information or other, personal data and/or contact details of

any third parts in this sens, the user guarantees to the Data Controller that any data of third parts indicated by the user and processed as if the third parts had given informed consent to the processing, has been acquired by the user in full compliance with current regulations on data processing. The user indemnifies the Data Controller with respect to any dispute, claim, request for compensation for damages, which may be received from any third part, due to the provision of data indicated by the user in violation of the legislation on the protection of personal data.

### **Navigation Data**

The computer systems and software procedures used to operate this website acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols. This information is not collected to be associated with identified data subjects, but by its very nature could, through processing and association with data held by third parties, allow users to be identified. This category of data includes IP addresses or domain names of the computers used by users who connect to the site, URI (Uniform Resource Identifier) addresses of the resources requested, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code relating to the operating system and computer environment of the user.

These data are used to obtain anonymous statistical information on the use of the site and to check its correct functioning. The data could be used to ascertain responsibility in case of hypothetical computer crimes against the site.

The purposes of the processing for such data are therefore:

to allow the functioning of the site and the execution of the services requested by the user

to control and improve the functioning of the site

to obtain and use statistical information on the use of the site

ascertaining responsibility in case of hypothetical computer crimes

The legal basis for the processing of such data is therefore the legitimate interest of the owner for the performance and improvement of the site services provided.

### **Cookies and tracking**

A cookie and similar technologies are small fragments of information used to store technical and/or personal details on the computer, identify users of a service and enable certain functions. These cookies are used by the Data Controller and its partners for technical, statistical and/or profiling reasons. For information on cookies used by the Services and how to refuse them, please visit the [cookie policy](#).

## **COMMUNICATION OF DATA TO THIRD PARTS**

### **Data provided voluntarily by the user**

The personal data provided by the user (such as for example: name, surname, e-mail, telephone, information contained, data for purchases through eCommerce, accounting data) are managed by the internal subjects (collaborators and employees) of the companies that are responsible for the treatment identified above according to their skills and within the scope of their duties and/or any

contractual obligations. Some data may be communicated, for the purposes indicated, to: external subjects/companies to whom the communication of personal data is necessary or functional for the execution of the service requested or management of the contractual relationship with the person concerned in the ways and for the purposes illustrated above.

### **Navigation Data**

The navigation data may be communicated to third parts.

### **Qualification of third parts**

Third parts that carry our support activities of any kind for the provision of services for the Data Controller, in relation to which they carry out personal data processing operations, are designated by the latter as Data Processors and are contractually bound to comply with measures for the security and confidentiality of processing.

The third parts to whom the data are communicated for the purposes indicated in this contract. The identity of such third parts is disclosed to users upon request to the contacts indicated. Any responsibility of the Owner is excluded in any case:

- A.** The rules and methods of management of personal data of other Websites, accessible from our pages through links and references.
- B.** The contents of any e-mail services, web spaces, chat forums provided to users.

### **Dissemination of data**

No data deriving from web services is disseminated, with this term meaning to give knowledge in any way to a plurality of indeterminate subjects.

### **TRANSFER OT THIRD COUNTRIES**

The personal data provided by the user and other types of data processed and navigation data may be processed or transferred to countries outside the EU, for the purposes indicated above, in accordance with current legislation on the transfer of data to third countries under Article 44 Reg 2016/670 (GDPR).

### **TREATMENT MODALITY**

Personal data are processed using computerized tools and in compliance with the confidentiality and protection measures provided for by current legislation. Specific security measures are observed to prevent data loss, illicit or incorrect use and unauthorized access. The processing operations connected to the web services offered by this site take place at the offices of the Data Controller and possibly at the offices for the external Data Processors who process data or provide services for the Data Controller and are handled by persons in charge of processing who are responsible for the management of the services requested and purposes indicated.

### **DATA RETENTION PERIOD**

**Data provided by the user:** The personal data provided by the user are kept for the period necessary for the execution of the indicated purpose(s) and, if necessary, for the fulfilment of contractual, fiscal, legal obligations. The CVs will be archived for a maximum period of 24 months unless further consent is given by the data subject to the maintenance.

**Navigation data:** Navigation data are kept for the period necessary to carry out the indicated purpose(s) and a maximum of 30 days after the survey.

## **AUTOMATED PROCESSES**

On the personal data voluntarily provided by the user for the request of site services, no automated decision-making process including profiling is carried out through the site. Automated decision-making processes (e.g. cookies), can be carried out on navigation/geolocalization data for site functions and/or automated processes aimed at analysing the user's habits, choices, navigation modes, through cookies or third party services, subject to the consent of the interested party as specified in the cookie policy. CONFERMENT OF DATA AND CONSEQUENCES OF NON-CONFERMENT

**Apart from that specified for navigation data, the user is free to provide the personal data contained in the site's service request forms.**

However, failure to provide the data provided with an asterisk as mandatory does not allow the continuation and therefore the performance of the requested service. Failure to provide the data indicated as optional, on the other hand, could lead to provision of an incomplete service and the inability to carry out the further activities of the Owner.

## **RIGHTS OF THE INTERESTED PARTS, FACULTY TO PROPOSE THE COMPLAINT AND REVOCATION OF CONSENT**

The subjects to whom the personal data refer have the right at any time to request, if the legal requirements are met, access to their personal data, rectification, cancellation, limitation of the same, to oppose the processing and exercise the right to portability of data. The interested part has the right to revoke at any time any consent given to the processing of data, without prejudice to the lawfulness of the processing based on the consent given before the revocation.

It should be remembered that, once deleted, your personal data can no longer be retrieved and even the contents stored in the services will be permanently deleted. Your personal data will also be deleted when it is no longer necessary for the purposes for which it was originally collected.

In order to exercise your rights under current legislation on the protection of personal data and to know the full list of External Data Processors appointed for each area and activity or to obtain information on the transfer of data to countries outside the EU and related guarantees, please write to [administration@topcontrol.it](mailto:administration@topcontrol.it) or send a fax to +39 0471 319 990.

The data subject also has the right to lodge a complaint to a data processing supervisory authority, located in particular in the Member State where he or she habitually resides or in the Member State where he or she works or in which the alleged has occurred.

## **MINORS, THRUThFULNESS OF THE DATA ENTERED AND OBLIGATIONS OF THE USER**

Protecting the privacy of the very young is particularly important for our society. This site does not direct its services to children and minors, although they are usually adequate for minors as well. The company may encourage parents and guardians to support minors in navigation. By registering for one of the services and accepting this Privacy Policy, you confirm that you are of the required age in your country to sign a contract or request the services provided. You further confirm that you have previously obtained the required parent/guardian consent in your country of residence, where applicable. In any case, CI reserves the right to contact you and verify that you meet these requirements and, if you do not meet them, the right to suspend or cancel your account altogether if you do not meet them and/or interrupt or suspend the services provided. The user guarantees the quality of the information provided for the services. All personal data entered or sent must be truthful, correct and up to date. The user assumes full responsibility that the information provided complies with this principle. The user assumes full responsibility that the information provided complies with this principle. Furthermore, you warrant that you have obtained the express consent of all those who own personal image, intellectual property or others rights to the content in question and have been authorized to upload and store it in the services.

## **CHANGES TO THIS PRIVACY POLICY**

This Privacy Policy will be updated periodically in case of changes in the processing or services provided or regulatory requirements so that users are promptly informed of such changes in the processing of their data. Therefore, please consult this page often, taking as a reference the date of last modification indicated at the bottom. In case of non-acceptance of the changes made to this privacy policy, the user is required to stop using this application and may request the Data Controller to remove his/her Personal Data. Unless otherwise specified, the previous privacy policy will continue to apply to Personal Data collected until that time.

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