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PRIVACY POLICY- "G.D.P.R. (General Data Protection Regulation)" (Reg. (EU) n.679/2016).

This informative describes how TRAMEC manages and processes the personal data of the users who consult our website, as well as the processing practices for the data transmitted by the interested party to the Data Controller via this website.

In compliance with art. 13 (for data collected from the subject) and 14 (for data not collected from the subject) of Regulation (EU) 2016/679 (GDPR), the Users of this Website are hereby provided with the following information, which refers exclusively to the processing carried out through this Website and not through other websites that may be visited through links from this one, for which it is suggested to read the relevant information provided by the respective Data Controllers of the before mentioned websites.

This Website and any potential services offered through the Website are reserved to the users that turned the age of eighteen years old. Therefore, the Data Controller does not collect personal data relating to users younger than 18 years old.

Under explicit request of such Users, the Data Controller will promptly delete all personal data involuntarily collected.

1. Data Controller

TRAMEC Srl with head and legal office in Corso Venezia, 36 – 20121 Milan, ITALY, VAT n° IT00636251209 (hereinafter also referred to as company name or "Owner"), in its capacity as data controller of the users' personal data of the website www.tramec.it (hereinafter, "Users") hereby provides the privacy policy pursuant to Article 13 of the EU Regulation 2016/679 of 27 April 2016 (hereinafter, "Regulation").

The Data Controller reserves t

The Owner reserves the right to appoint a web agency or a consultant as Data Processor of the personal data managed for the purposes of technical assistance, maintenance, technical management and alike of this Web Site, whose details may be communicated upon request to the addresses indicated below. The Owner and the Data Processor process Users' data also thanks to their own internal Representatives, specifically appointed and provided with instructions for the correct processing of personal data, also verbally.

2. Place of data processing

The processing connected with the web services provided on this web site are carried out at the offices of Tramec S.r.l., except in the case of explicit exceptions, and are carried out only by technical personnel of Tramec S.r.l. assigned to such processing. The site hosting service is provided by Infracom Italia S.p.A., P.le Europa 12, 37135, Verona, Italy, which guarantees Tramec S.r.l. compliance with current legislation. The data acquired via the web site, or in any case deriving from the web services, may be communicated to the technological and instrumental partners that the Data Controller uses to provide the services requested by users/visitors. Tramec S.r.l. guarantees, in any case, compliance with the regulations in force as far as it is concerned.





3. Purpose of the data treatment

The personal data of the Users of the Website, as described above, shall be processed in the manner and in the form prescribed by the GDPR, for the performance of the functions of the Website, with particular, but not exclusive, reference to the procedures described therein for data collection, contact form, possible registration/access to reserved area, subscription to the newsletter and alike.

Specifically, personal data provided to the Owner will be processed to achieve following purposes:

- to follow up on specific requests made to the Owner by the User through the Web Site and its communication tools (contact forms, information request forms and the alike);
- for the possible subscription to the newsletter and the consequent sending of sales communications and various information concerning the sector in which the Owner operates, with the specific consent given by the user;
- for communications and informative relating to the services of the Owner, following the request for information by e-mail or by filling out the contact form and other communication tools;
- for other purposes related to those mentioned above and, in any case, falling within the scope of the activities of the Web Site;
- for the processing of the e-mail address, provided by the interested party in the context of the sale of a product or service, also aimed at sending, without further consent, communications for the subsequent direct sale of products or services similar to those covered by the sale itself;

The interested party may in any case express his/her refusal and objection to such processing, both initially and subsequently, free of charge, following the instructions given in any subsequent communication.

The processing of data provided in a generic way will be carried out, also as a result of automatic collection during navigation, for the sole purpose of ascertaining and controlling access to the Web Site.

This also applies to technical cookies, to be understood as navigation cookies, functionality or analytics cookies, that satisfy the requirements specified by the Privacy Guarantor. In particular, with regard to the latter, it is clarified that they can be assimilated to technical cookies where these are made and used directly by the Web Site.

In any case, for these analytics cookies, the Web Site, also in accordance with the clarifications of the Privacy Guarantor, has provided for the anonymization of IP addresses and the amendment to the processing of data; the collection and use of such navigation data (subject to the anonymization of IP addresses) allow monitoring of the progress of the Web Site and allow to improve the service offered, offering the User a better browsing experience.

Data collected through "MailUp" platform

For complete information we specify that in sending email communications, TRAMEC Srl uses a compliant platform, which, through statistical tracking systems, allows to detect the opening of a message, the clicks made on hyperlinks contained within the email, from which IP address or with which type of browser the email is opened, and other similar details. The collection of such data is functional to the use of the platform and is an integral part of the functionality of the message delivery system.

The User can also easily object to further newsletter mailings by clicking on the appropriate link for the revocation of consent, which is present in each email containing the newsletter. Once the revocation of consent has been made, the Owner will send the User a message as confirmation of the revocation.





3.1. Nature of data conferment and consequences of a possible refusal to answer

The provision of consent to the data processing for the purposes referred to in this article, is compulsory exclusively for the purposes indicated in relation to each service, subject to information provided in the manner established by law. In other words, the consequences of a possible refusal to answer or to give consent are always explicit and are related to each service provided: for example, a refusal to its treatment can prevent the consultation of the site with all its features (in the case of cookies), the configuration of products and the generation of 3D CAD models (in the case of the service "3D Configuration") or the receipt of advertising material. Therefore, the user is informed in the manner appropriate to each case, but in any case, the Users may consult the website also denying consent to the processing of personal data, where required; in which case, certain features or functions may be disabled.

3.2. Cookies

What are cookies?

Cookies are pieces of information stored by your browser when you visit a website with any suitable device (such as a PC, tablet or smartphone). Each cookie contains various data (e.g., the name of the server it comes from, a numeric identifier, etc.), may remain on the system for the duration of a session (until the browser is closed) or for long periods and may contain a unique identifier. For further information on cookies it is possible to visit the Web Site of the [Privacy Guarantor](#).

What are they used for?

Cookies are used for different purposes depending on their type: some are strictly necessary for the proper functioning of a website (technical cookies), while others optimize performance to provide a better user experience or allow you to acquire statistics on site usage, such as analytics cookies or allow you to view personalized advertising, such as profiling cookies.

Consent:

The eventual provision of the user's consent is stored by Tramec S.r.l., to the extent of its competence, through a technical cookie, having a duration of 12 months. The user is informed both through the short information (banner displayed at the first visit to the site until the consent is given or denied, as explained in paragraph 3.5. "How to disable cookies?") and through this extended information; in addition, paragraph 3.4 contains links to the privacy policies of third parties, including for the purpose of their disabling (where directly available through the same).

How to disable them?

You can disable cookies either through your browser settings (par. 3.5. "How to disable cookies?") or through the mechanisms made available by certain third parties (par. 3.4 "Cookies used on the site").

3.3 General types of cookies used in the Web Site

Technical cookies: these are essential for the proper functioning of this site.

Analytical cookies (third party): these are used for the purposes of aggregate analysis of visits to the site, using a third-party service.

3.4 Cookies used in the Web Site

First-party cookies: only technical cookies are used, with the following purposes:

- a) to store the user's consent to the use of cookies (duration: 12 months);
- b) to allow the site to function properly (duration: session);
- c) to memorize the language preference used on the site (duration: 12 months).



Third-party cookies: the following third party cookies are used on the Web Site. For each of them are indicated:

- (a) the name of the site or service rendered by the third party,
- (b) the purpose,
- (c) the link to the privacy policy and, where available, the link to the third party's website.

List of third-party services that install cookies:

- **Google Analytics** (to analyze visits to the Web Site, in aggregate form and by masking IP addresses to better protect the privacy of visitors; the service is provided by Google Inc.). Useful resources:
 - [Privacy policy](#)
 - [Cookie policy](#)
 - [Ulteriori informazioni](#)
 - [Disabilitazione \(mediante add-on\)](#)
- **YouTube** (to allow viewing of videos through the YouTube platform; the service is provided by Google Inc.). Useful resources:
 - [Privacy policy](#)
 - [Informazioni specifiche](#) ("YouTube" section)
- **Tetraservice** (to make the configurator service available; the service is provided by Tetraservice s.r.l.). Useful resources:
 - [Web Site](#)
 - [Privacy policy](#)

3.5. How to disable cookies?

Browser Control: Commonly used browsers (e.g., Internet Explorer, Firefox, Chrome, Safari) accept cookies by default, but this setting can be changed by the user at any time. This applies to both PCs and mobile devices such as tablets and smartphones: it is a generally and widely supported feature. Therefore, cookies can easily be deactivated or disabled by accessing the options or preferences of the browser you are using and generally only third party cookies can be blocked; in general, these options will only take effect for that browser and on that device, unless you have options to unify preferences on different devices. Specific instructions can be found on the options or help page of the browser itself. Disabling technical cookies, however, may affect the full and/or proper functioning of several sites, including this Web Site.

As a rule, the browsers used up today:

- offer a "Do not track" option, which is supported by some (but not all) websites. As a result, some websites may no longer collect certain browsing data;
- offer the option of anonymous or incognito browsing: this means that no data will be collected in the browser and no browsing history will be saved, but browsing data will still be collected by the operator of the website visited;
- allow the deletion of all or part of the stored cookies, but on a new visit to a website they are usually installed if this option is not blocked.

We provide links to the support pages for the most popular browsers (with instructions on how to disable cookies on those browsers):

- [Firefox](#);
- [Internet Explorer](#);
- [Safari \(iOS\)](#);
- Chrome ([desktop](#) - [Android e iOS](#))



Third party cookies: third party cookies can be disabled either in the manner described above or by referring to each third party (following the links indicated in the previous paragraph).

Online tools: we would like to point out that from the site <http://www.youronlinechoices.com> it is possible not only to acquire further information on cookies, but also to verify the installation of many cookies on your browser/device and, where supported, also to disable them.

4. Legal basis of the treatment

The processing of personal data is based on the right to information, the fulfillment of contractual obligations or social contact, precisely where necessary consent through the free and informed completion of the appropriate information fields in the dedicated form.

5. Legitimate interest of the Owner

The processing of personal data is also based on the legitimate interest of the owner, such as the exercise of their rights in the context of the information society, the performance of contractual services and the implementation of direct marketing operations.

6. Obligation to data transfer

The provision of navigation data by Users, for the above purposes, depends on the level of privacy that Users have enabled or disabled through their browser. In some cases, disabling it may affect navigation on this Web Site. For certain modules of this Web Site, the provision of navigation data and/or the use of technical cookies is mandatory for the proper functioning of the Web Site itself.

The conferment of some personal data is in any case necessary for the structure of the Web Site and its procedures. The eventual request for other optional data will be preceded by a specific approval banner. The provision of all other data is optional, in accordance with the type of information that the User wishes to provide to the Web Site.

7. Possible recipients of personal data

The data may be communicated to companies connected to, linked to or controlled by the Owner, as well as to consultants, or even third parties who operate, also in the name and on behalf of the Owner, for the performance of services connected to the purposes indicated in this information notice, both within the EU and outside the EU (in the latter case, they will be exclusively subjects adhering to the Privacy Shield protocol).

Navigation data and similar (for which reference is made to the above), as well as profiling cookies, including those of third parties (par. 3.2 "Cookies"), will be communicated to the respective third parties involved, where they do not manage them directly as Data Controllers.

8. Preservation period

The data provided by the interested party will be preserved until expressly revoked by the interested party, also by means of an action on his/her browser, cleaning of cookies, express request or any other manner. Navigation data will be preserved for the technical time necessary to perform the functions for which they were collected.

9. Rights of the data subject

Each Interested party has the right of access, rectification, cancellation (oblivion), restriction, receipt of notification in case of rectification, cancellation or restriction, portability, opposition and not to be subject to an automated individual decision, including profiling, pursuant to Articles 15 up to 22 of the GDPR. These rights may be exercised in the forms and terms set out in Article 12 GDPR, by written notice sent to the Owner by email to the relevant email address.



The Owner shall render an adequate response as soon as possible and in any event within 1 month of receipt of the request. Pursuant to articles 15 and following of the Regulations, the user has the right to request access at any time.

10. Right to withdraw consent

You may revoke this consent at any time by:

- sending an email to the Controller's address: privacy@tramec.it ;

or

- by post to: Tramec S.r.l., via Bizzarri n. 6, 40012, Calderara di Reno (BO) - ITALY.

11. Complaints

Each Data Subject shall have the right to lodge a complaint pursuant to Articles 77 et seq. of the GDPR with a supervisory authority, which in Italy is the Guarantor for the protection of personal data. The forms, methods and terms for lodging complaints are provided for and governed by the national legislation in force. Complaints are without prejudice to administrative and judicial actions, which for the Italian State may be brought either before the same Guarantor or before the competent Court.

12. Profiling

The personal data provided with the form may be subject to profiling. Profiling enables the Owner to assess certain personal aspects of the data subject, relating to his/her preferences, interests and tastes with reference to the products sold and to the services offered.

