



CyTech s.r.l.
VAT no. 03587250261

Via Roma, 106, 31020, San
Vendemiano (TV)

REV. 01 of 10/06/2019 –
MOD.PRI.15 – Corporate website
Privacy Policy

PRIVACY NOTICE ON PROCESSING OF PERSONAL DATA

in accordance with Regulation (EU) 2016/679 and Legislative Decree 196/2003, as modified by Legislative Decree 101/2018

Pursuant to article 13 of Regulation (EU) 2016/679, hereinafter referred to as GDPR (*General Data Protection Regulation*), and Legislative Decree 196/2003, as modified by Legislative Decree 101/2018, we hereby inform you that the processing of data described below is carried out by:

Controller	Cytech s.r.l.
Address	Via Roma, 106, 31020, San Vendemiano (TV), Italy
E-mail address	info@elasticinterface.com
Telephone number	+39 0438 403 261

As there are several different data processing procedures performed, please ensure that you read the whole document with care

PROCESSING OF YOUR PERSONAL DATA TO ENSURE THE WEBSITE FUNCTIONS PROPERLY AND FOR SECURITY PURPOSES

a) Legal basis and purpose of processing

The processing will take place pursuant to article 6, paragraph 1, c. f), i.e. pursuit of the controller's legitimate interests to be present and contactable on the global World Wide Web.

b) Storage period and specifications of the personal data being processed

The personal data being processed for the proper fulfilment of the purpose indicated above are:

Personal data	Reason	Storage period of data	Processor	Server location in EU or outside EU
IP address	Implicitly transmitted in the use of Internet communication protocols, your IP address is stored by the server on which our web domain is located	Seven (7) days	Aruba S.p.A.	EU – Italy
Code relating to your request	The server automatically acquires a code relating to the correct or failed execution of your request to view a page	Seven (7) days	Aruba S.p.A.	EU – Italy
Time of visit	The server automatically acquires the time of the visit	Seven (7) days	Aruba S.p.A.	EU – Italy
URI/URL notations	Uniform Resource Identifier/Locator of the resources requested	Seven (7) days	Aruba S.p.A.	EU – Italy
Time of request	The server automatically acquires the time of requests to access web pages	Seven (7) days	Aruba S.p.A.	EU – Italy



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Method used to submit the request	The server automatically acquires the method used to submit the request	Seven (7) days	Aruba S.p.A.	EU – Italy
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Personal data	Reason	Storage period of data	Processor	Server located in or outside EU
Size of file obtained	The server automatically acquires the size of the file obtained in response to the request	Seven (7) days	Aruba S.p.A.	EU – Italy
Domain names of the computer and terminals used	The server automatically acquires the domain name of the computer and terminals used by the user for security purposes	Seven (7) days	Aruba S.p.A.	EU – Italy

c) Methods of processing

The processing of your personal data identified above, processed for the proper fulfilment of the purpose indicated at point a), will be subject to automated processing by our data processor Aruba S.p.A..

Cookie	Purpose	Storage period	Type	Processor	Data transferred within/outside EU	Adequacy level and/or standard contract terms
(Without name)	Strictly necessary cookie	Session	http cookie	X	X	X

d) Disclosure of your data to third parties

Excluding the disclosure to Aruba S.p.A. for the proper execution of the purpose indicated above, your personal data will not be disclosed to third parties.

e) Transfer of your data to Third Countries

Your data will not be transferred to Third Countries (outside the European Union). The controller reserves the right, in all cases, to modify this policy after verifying the level of adequacy of the Third Country and/or the adoption of standard contractual clauses approved by the European Commission.

f) Your rights

We inform you that **pursuant to Articles 15 to 21 of Regulation (EU) 2016/679 or GDPR** (General Data Protection Regulation), you have the following rights in relation to the processing of personal data:

- Right to lodge a complaint with a supervisory authority (articles 77 – 79). If you believe that the processing of your personal data violates the European Regulation, you can lodge a complaint with the Italian Data Protection Authority (*Garante per la Protezione dei Dati Personali*). We invite you to visit the Authority’s website at <http://www.garanteprivacy.it>;
- Right of access (article 15). The right of access to your personal data establishes, in particular, your right to obtain the following information:
 - o the purposes of the processing,
 - o the categories of personal data concerned;
 - o the recipients or categories of recipient to whom the personal data have been or will be disclosed;
 - o the storage period of the data.



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- Right to rectification (article 16). The article mentioned states that «The data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her ».
- Right to erasure (article 17). This right determines your ability to obtain the erasure of data in cases where, for example, they are no longer necessary with respect to the purposes.
- Right to restriction of processing (article 18).
- Obtain notification regarding rectification or erasure of your data (article 19).
- Right to data portability (article 20).
- Right to object (article 21).

Since it is not possible to provide a full explanation of the above rights, we invite you to visit the Italian Data Protection Authority's website at the following link: <http://eur-lex.europa.eu/legal-content/IT/TXT/PDF/?uri=CELEX:32016R0679&from=IT>.

g) How to exercise your rights

We consider the opportunity to exercise these rights to be a matter of primary importance and therefore we invite you, should you wish to exercise these rights or have any further request for information, to contact us. Please send such requests to the operational headquarters of the Controller using the contact details shown above.

PROCESSING OF YOUR PERSONAL DATA FOR STATISTICAL PURPOSES

a) Legal basis and purpose of processing

The processing will take place pursuant to article 6, paragraph 1, c. a), GDPR, i.e. on an exclusively consensual basis and is aimed solely at the statistical analysis of the flow of visitors to the website.

b) Storage period and specifications of the personal data being processed

The personal data being processed for the proper fulfilment of the purpose indicated above are:

Cookie	Purpose	Storage period	Type	Processor	Data transferred within/outside EU	Adequacy level and/or standard contract terms
_ga	Registers a unique ID used to generate statistical data on how the visitor uses the website	Two (2) years	Http cookie	Google LLC	USA	Subject adhering to the so-called <i>Privacy Shield</i>
_gat	Used by Google Analytics to limit the frequency of requests	One (1) day	http cookie	Google LLC	USA	Subject adhering to the so-called <i>Privacy Shield</i>
_gid	Registers a unique ID used to generate statistical data on how the visitor uses the website	One (1) day	http cookie	Google LLC	USA	Subject adhering to the so-called <i>Privacy Shield</i>
_stid	Used by ShareThis for analytical statistical purposes	One (1) year	http cookie	ShareThis	USA	Subject adhering to the so-called <i>Privacy Shield</i>

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Cookie	Purpose	Storage period	Type	Processor	Data transferred within/outside EU	Adequacy level and/or standard contract terms
lp_JAR	Stores user preferences and information each time they visit web pages containing geographic maps of Google Maps	Persistent	http cookie	Google LLC	USA	Subject adhering to the so-called <i>Privacy Shield</i>
CONSENT	Used for consent to Google services	Persistent – Twenty (20) years	http cookie	Google LLC	USA	Subject adhering to the so-called <i>Privacy Shield</i>
NID	Stores user preferences and information each time they visit web pages containing geographic maps	Persistent – Six (6) months	http cookie	Google LLC	USA	Subject adhering to the so-called <i>Privacy Shield</i>

c) Method of processing

The processing of your personal data will be performed both manually and automatically by means of the technologies described above.

d) Disclosure of your data to third parties

Your data will be disclosed to all the Processors shown above.

e) Transfer of your data to Third Countries

Your data will be transferred to Third Countries, i.e. Countries outside the European Union, as described above.

f) Voluntary consent

Giving consent is **voluntary** and **not necessary** for the website to function properly.

g) Withdrawal of consent

You may withdraw your consent at any time without affecting the lawfulness of the processing carried out up to that point.

h) Your rights

We inform you that **pursuant to Articles 15 to 21 of Regulation (EU) 2016/679 or GDPR** (General Data Protection Regulation) you have the following rights in relation to the processing of personal data,:

- Right to lodge a complaint with a supervisory authority (articles 77 – 79). If you believe that the processing of your personal data violates the European Regulation, you can lodge a complaint with the Italian Data Protection Authority (*Garante per la Protezione dei Dati Personali*). We invite you to visit the Authority's website at <http://www.garanteprivacy.it>;
- Right of access (article 15). The right of access to your personal data establishes, in particular, your right to obtain the following information:
 - o the purposes of the processing;
 - o the categories of personal data concerned;
 - o the recipients or categories of recipient to whom the personal data have been or will be disclosed;
 - o the storage period of the data.

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- Right to erasure (article 17). This right determines your ability to obtain the erasure of data in cases where, for example, they are no longer necessary with respect to the purposes.
- Right to restriction of processing (article 18).
- Obtain notification regarding rectification or erasure of your data (article 19).
- Right to data portability (article 20).
- Right to object (article 21).

Since it is not possible to provide a full explanation of the above rights, we invite you to visit the Italian Data Protection Authority's website at the following link: <http://eur-lex.europa.eu/legal-content/IT/TXT/PDF/?uri=CELEX:32016R0679&from=IT>.

i) How to exercise your rights

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PROCESSING OF YOUR PERSONAL DATA FOR REMARKETING PURPOSES

a) Legal basis and purpose of processing

The processing will take place pursuant to article 6, paragraph 1, c. a), GDPR, i.e. on an exclusively consensual basis and is aimed solely at the activity of remarketing.

b) Storage period and specifications of the personal data being processed

The personal data being processed for the proper fulfilment of the purpose indicated above are:

Cookie	Purpose	Storage period	Type	Processor	Data transferred within/outside EU	Adequacy level and/or standard contract terms
_unam	Allows you to use the share buttons on every page of the website to share content on various social networks. Monitors web pages viewed, navigation and time spent on each page. Organizes personal identification only if there is separate registration on ShareThis	Ten (10) months	http cookie	ShareThis	USA	Subject adhering to the so-called <i>Privacy Shield</i>

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Cookie	Purpose	Storage period	Type	Processor	Data transferred within/outside EU	Adequacy level and/or standard contract terms
_fbp	Used by Facebook to deliver a series of advertisement products such as real time bidding from third-party advertisers.	Three (3) months	http cookie	Facebook Inc	USA	Subject adhering to the so-called <i>Privacy Shield</i>
fr	Used by Facebook to deliver a series of advertisement products such as real time bidding from third-party advertisers.	Three (3) months	http cookie	Facebook Inc	USA	Subject adhering to the so-called <i>Privacy Shield</i>

c) Method of processing

The processing of your personal data will be performed both manually and automatically by means of the technologies described above.

d) Disclosure of your data to third parties

Your data will be disclosed to all the Processors shown above.

e) Transfer of data to Third Countries

Your data will be transferred to Third Countries, i.e. Countries outside the European Union, as described above.

f) Voluntary consent

Giving consent is **voluntary** and **not necessary** for the website to function properly.

g) Withdrawal of consent

You may withdraw your consent at any time without affecting the lawfulness of the processing carried out up to that point.

h) Your rights

We inform you that **pursuant to Articles 15 to 21 of Regulation (EU) 2016/679 or GDPR** (General Data Protection Regulation) you have the following rights in relation to the processing of personal data:

- Right to lodge a complaint with a supervisory authority (articles 77 – 79). If you believe that the processing of your personal data violates the European Regulation, you can lodge a complaint with the Italian Data Protection Authority (*Garante per la Protezione dei Dati Personali*). We invite you to visit the Authority's website at <http://www.garanteprivacy.it>;
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- Right to erasure (article 17). This right determines your ability to obtain the erasure of data in cases where, for example, they are no longer necessary with respect to the purposes.
- Right to restriction of processing (article 18).
- Obtain notification regarding rectification or erasure of your data (article 19).
- Right to data portability (article 20).
- Right to object (article 21).

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PROCESSING OF YOUR PERSONAL DATA FOR THE PURPOSE OF SENDING PROMOTIONAL MATERIAL THROUGH NEWSLETTERS

a) Legal basis and purpose of processing

The processing will take place pursuant to article 6, paragraph 1, c. a), GDPR, i.e. on an exclusively consensual basis and is aimed solely at the activity of sending promotional and marketing material via a special newsletter service.

b) Storage period and specifications of the data being processed

The personal data being processed for the proper fulfilment of the purpose indicated above are:

Personal data	Data strictly necessary/not necessary	Reason	Storage period of data	Processor	Server location in EU or outside EU	Adequacy level and/or standard contract terms
Name and surname	Data not strictly necessary	Your name will be processed exclusively upon your specific consent	Five (5) years	MailChimp The Rocket Science Group	USA	Subject adhering to the so-called <i>Privacy Shield</i>
E- mail address	Data strictly necessary	Data strictly necessary for the service to function properly	Five (5) years	MailChimp The Rocket Science Group	USA	Subject adhering to the so-called <i>Privacy Shield</i>

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Personal data	Data strictly necessary/not necessary	Reason	Storage period of data	Processor	Server location in EU or outside EU	Adequacy level and/or standard contract terms
Gender	Data not strictly necessary	Your gender will be processed exclusively upon your specific consent	Five (5) years	MailChimp The Rocket Science Group	USA	Subject adhering to the so-called <i>Privacy Shield</i>
Country	Data not strictly necessary	Your country will be processed exclusively upon your specific consent	Five (5) years	MailChimp The Rocket Science Group	USA	Subject adhering to the so-called <i>Privacy Shield</i>
Type (consumer, retailer, pants manufacturer, other)	Data not strictly necessary	Your type will be processed exclusively upon your specific consent	Five (5) years	MailChimp The Rocket Science Group	USA	Subject adhering to the so-called <i>Privacy Shield</i>
Interests	Data not strictly necessary	Your interests will be processed exclusively upon your specific consent	Five (5) years	MailChimp The Rocket Science Group	USA	Subject adhering to the so-called <i>Privacy Shield</i>

c) Method of processing

The processing of your personal data will be performed both manually and automatically.

d) Disclosure of your data to third parties

Your personal data will be disclosed to the processors shown above.

e) Transfer of data to Third Countries

Your personal data will be transferred to Third Countries as shown above.

f) Voluntary consent

Giving consent is **voluntary** and **not necessary** for the website to function properly.

g) Withdrawal of consent

You may withdraw your consent at any time without affecting the lawfulness of the processing carried out up to that point. In order to ensure that revoking your consent is as easy as possible, you can do this at any time via the appropriate section of the website or by following the link ("button") at the bottom of each newsletter.

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- Right to data portability (article 20).
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