

Subject: Policy statement concerning the processing of personal data, pursuant to art. 13, EU Regulation no. 2016/679 - “GENERAL DATA PROTECTION REGULATION” (hereinafter “GDPR”) and D. Lgs. (Legislative Decree) 196/2003, supplemented by D. Lgs. 101/2018.

This statement is issued to bring to your attention the ways in which the companies of GRUPPO COLINES HOLDING SRL process your personal details, gathered during navigation on our website www.colines.it. Unless otherwise stated, all the articles cited refer to the regulation indicated in the title.

1) Data controller

The Controller of the processing is Gruppo Colines Holding SRL (hereinafter also Controller or Company), with registered address in Via Biglieri 4, Novara (28100 – NO) – VAT Reg. No. IT01030440034.

2) Appointment of DPO

Since the Controller does not fall into the categories indicated in Art. 37 of the GDPR, or into those indicated in the various interpretations by the Data Protection Authority, it has not been deemed necessary to appoint a Data Protection Officer.

3) Data subject to processing

1 Navigation data

In the course of their normal activity, the IT systems and the software procedures controlling the functioning of this website acquire personal details whose transmission is implicit in the use of Internet communication protocols.

This information is not gathered in order to be associated with identified interests, but could by its very nature, through processing and association with data held by third parties, enable identification of users.

This category of data includes the IP addresses or the domain names of the computers used by persons connecting to the site, the addresses in URI (Uniform Resource Identifier) notation of the resources requested, the time of the request, the method used in submitting the request to the server, the size of the file obtained in reply, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the user's operating system and IT environment.

2 Enquiries, contacts with the sales office

The optional, explicit and voluntary sending of electronic mail to the addresses indicated on this site, or of data through the forms present on the site, will entail the subsequent acquisition of the sender's address, which is necessary for responding to enquiries, and of any other personal data included in the communication.

Information concerning you will be handled in compliance with the principles of correctness, lawfulness, transparency and protection of privacy. The data will be handled and stored electronically and on paper for the time strictly necessary to achieve the purpose for which they have been gathered.

Specific security measures are observed to prevent the loss of data, illicit or incorrect use and unauthorised access.

3 Sending of CVs online

In addition to personal and contact details, the form for sending CVs requires other information of a curricular and professional nature.

These data are stored on the server provided by the site host manager and acquired by the Data Controller for personnel selection activities.

4 Cookies

Cookies are text files sent by visited sites to the user's terminal, where they are memorised for subsequent retransmission to the same sites at the following visit.

The Site uses:

- A session cookie, whose use is not instrumental to the collection of personal data identifying the user, as it is limited solely to the transmission of session identifying data in the form of numbers generated automatically by the server, with no possibility of personalisation. The session cookie is memorised in persistent mode on the user's device and is deleted automatically on closure of the browser.
- Third party cookies (for example regarding Google Analytics). The controller does not however have access to these data, which are gathered and handled in complete autonomy by the third parties. For further information as to the logics and ways of treatment of the data gathered by Google, users are invited to read the privacy statements issued by the entities providing the services in question.

Technical cookies are not used for User profiling activities.

The User may choose to enable or disable the cookies by intervening on his or her own navigation browser according to the instructions made available by the relating providers at the links indicated below:

- [Chrome](#)
- [Firefox](#)
- [Safari](#)
- [Internet Explorer](#)
- [Opera](#)

4) Purpose of processing, legal basis, nature of conferment

The purpose of the processing as per point 3.1 is to obtain anonymous statistical information as to the use of the site and to check its correct functioning. The data may be used to ascertain responsibility in case of hypothetical cyber-crime to the detriment of the site. The processing is lawful pursuant to Art. 6, paragraph 1) letters b) and f) of the GDPR. The conferment of the data is therefore obligatory, as it would otherwise be impossible to manage the contractual aspects correctly.

The purpose of the processing as under point 3.2 is again connected and/or instrumental to the consultation of the site (any use differing from and/or conflicting with that of the person concerned is therefore excluded). In particular, personal data handling is limited to responding to enquiries made by the person concerned. This processing is legitimate as per Art. 6, para. 1, letter a) and requires the explicit agreement of the person concerned. Any conferment of the data is optional;

however, in the event of refusal to provide the personal data relevant to the purpose of their collection, it will not be possible to satisfy the request.

The aim of the processing as under point 3.3 is the assessment of your professional profile for the purpose of personnel selection. Conferment of the details is obligatory, otherwise it will not be possible to take part in the selection programme. Additional information, however, is entirely discretionary and it is for you to determine its width and depth. This information will be used exclusively as an integral part of the selection process. Its processing is lawful under Art. 6, para. 1, letter b) of the GDPR and does not require your explicit consent.

The purpose of the processing as under point 3.4 is to improve the user's navigation experience and to collect aggregate information for statistical purposes. All conferment of data is optional.

5) Manner of processing, duration of processing

The processing of your personal details in relation to point 3.1 is carried out by means of the operations indicated in Art. 4 no. 2) GDPR, namely collection, storage, organisation, use, deletion. Your personal data are submitted to electronic and/or automatised processing and will be deleted immediately after elaboration.

The processing of your personal details in relation to point 3.2 is carried out by means of the operations indicated in Art. 4 no. 2) GDPR, namely collection, storage, organisation, use, deletion. Your personal details are submitted to electronic and/or automatised processing.

The processing of your personal details in relation to point 3.3 is carried out by means of the operations indicated in Art. 4 no. 2) GDPR, namely collection, storage, organisation, use, deletion. Your personal details are submitted to electronic processing and will be cancelled after a period of 10 years from their receipt unless you have been hired during that time lapse. In the latter case, these data will be entered in you employee file and will be treated as such.

The processing of your personal details in relation to 3.4 will be carried out according to the rules and manner of whoever provides the different services and is indicated in the dedicated statements, mentioned in point 3.4.

6) Access to data

Your data may be made available for the purposes mentioned in point 4) to the Controller's employees and professionals, in their capacity as internal appointees and/or persons in charge of the processing and/or system administrators, or to third-party companies or other entities (by way of example, institutes of credit, professional offices, consultants, insurance companies for the provision of insurance services, etc.) performing outsourcing activities on behalf of the Controller, in their capacity as external figures responsible for the processing.

7) Communication of data

Without needing express consent (ex art. 6 letter b), c) of the GDPR), the Data Controller may communicate your details for the purposes set out in point 4) to supervisory bodies, public authorities (in particular health), judicial authorities and other companies of the Colines Group and also to those entities to whom communication is obligatory by law for the execution of the said purposes. The said companies will process the data in their capacity as autonomous data controllers. Your data will not be disseminated.

8) Transfer of data to extra-EU countries

The personal details conferred, as under point 3), are preserved in electronic and/or paper format on servers and/or in physical archives located on the premises of the Controller, within the European Union. However, it remains understood that the Controller shall have the power, should it become necessary, to transfer archives and servers to other EU countries or also to extra-EU countries, for example in the case of using Cloud services. In that case the Controller hereby guarantees that the transfer of data outside the EU will take place in compliance with the relevant provisions of law, after prior agreement of the standard contractual clauses envisaged by the European Commission.

9) Rights of the interested party

In your capacity as interested party, you enjoy the rights as set out in arts. 15, 16, 17, 18, 19, 20, 21 and 22 of the GDPR. In detail:

- Right of access
- Right of rectification
- Right of cancellation (“right to be forgotten”)
- Right to restriction of processing
- Right to obligation of notification in case of rectification or erasure of personal details or restriction of processing
- Right to portability of data
- Right of objection
- Rights relating to the automatic decision-making process regarding natural persons, including profiling.

10) Manner of exercise of the interested person’s rights

You may exercise these rights at any time by sending:

- a registered letter, with advice of receipt, addressed to the Data Controller, as specified in point 1)
- an email to the address privacy@colines.it

Gruppo Colines Holding S.r.l.