

# PRIVACY POLICY E-COMMERCE PLATFORM Information notice pursuant to Art. 13 Regulation (EU) 2016/679 (GDPR) and Art. 130, co. 4, D.Lgs. 196/2003



#### WHY THIS INFORMATION

Pursuant to the Regulation (EU) 2016/679 (hereinafter "GDPR"), this page describes how 3V Tech Spa handles personal data of this website users. This is an information notice that is provided in accordance with Article 13 GDPR. The information does not apply to other third party websites that may be consulted through links on this website, for which no responsibility is accepted.

#### Personal data processed

**Personal data**: any information relating to an identified or identifiable natural person ("data subject"); an identifiable person is a data subject who can be identified, directly or indirectly, by reference in particular to an identifier such as a name, an identification number, location data, an online identifier, or to one or more features of his or her physical, physiological, genetic, mental, economic, cultural or social identity (C26, C27, C30 GDPR).

#### **Browsing data**

The computer systems and software procedures used to operate this website acquire, in the course of 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 interested parties, 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) notation 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 indicating the status of the response given by the server (successful, error, etc.) and other parameters related to the user's operating system and computer environment.

## Data communicated by the interested party

The optional, explicit and voluntary sending of messages to the contact addresses indicated on this site and/or the filling in of data collection forms entails the subsequent acquisition of the sender's address, necessary to respond to requests and to finalize your purchases as well as any other personal data entered.

#### **Specific disclosures**

Specific disclosures will be present on the pages of the site in relation to particular services or data processing provided.



## Cookies. What are cookies? What are cookies used for?

For information about the cookies used by this website, see the cookies policy shown in the footer of the site and at the following link.



## 1.WHO IS THE DATA CONTROLLER? HOT CAN YOU CONTACT HIM?

The Data Controller is **3V Tech S.p.a.**, with registered office Via Fatebenefratelli 20, 20121, Milano (MI), Italy, in person of its legal representative. The Data Controller can be contacted at the following contacts: 035.0761311, e-mail: <a href="mailto:privacy@3v-tech.com">privacy@3v-tech.com</a>

2. PURPOSE OF PROCESSING, LEGAL BASIS, DATA RETENTION PERIOD, AND NATURE OF PROVISION OF DATA



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PURPOSE OD PROCESSING	LEGAL BASIS	DATA RETENTION	NATURE OF PROVISION
A. Navigation on this website	Legitimate interest of the controller: activities strictly necessary for the operation of the platform and the provision of the browsing service.  Art. 6, par. 1 lett. f) GDPR	For the duration of the browsing session.	The provision of navigation data is necessary in order to allow navigation on the web platform. Failure to provide it will result in the inability to navigate the platform.
B. Contact form, sending contact requests, information, quotes	Processing is necessary for the execution of pre-contractual measures taken at its request (C44); Art. 6 para. 1(b) of the GDPR	Maximum 12 months	The provision is necessary. Failure to provide the necessary data will result in the inability to be contacted and receive the requested information.
C. <b>Direct marketing activities</b> , for sending advertising material through newsletter.	The processing is based on consent to the processing of personal data (C42, C43) art. 6 para. 1 lett. a) of the GDPR	Until you withdraw your consent (or opt-out)	The provision of data is optional. Failure to provide the necessary data will make it impossible to receive direct marketing communications via newsletter from the Data Controller
D. Direct marketing, automated "soft-spam" by e-mail: the Data controller will use, for the purpose of direct sales of their own products or services, the e-mail coordinates provided by the data subject in the context of the sale of a product or service, without requesting the consent of the data subject, for promotional and commercial communications and newsletters on services similar to those being sold and the data subject, adequately informed, does not refuse such use, initially or on the occasion of subsequent communications. The data subject, at the time of	Legitimate interest of the Controller (Art. 6(1)(f) GDPR):  Processing is necessary for the pursuit of the legitimate interest of the Data controller, provided that the interests or fundamental rights and freedoms of the data subject requiring the protection of personal data are not overridden (C47-C50)  Art. 6 PAR. 1 lit. f) GDPR	Until opposition	The provision is optional.  If personal information is not provided the Data Controller will not be able to contact you for marketing communications (soft-spam).



collection and at the time of sending any communication made for the purposes referred to in this paragraph, shall be informed of the possibility to object to the

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Art. 130, para. 4 of
Legislative Decree

196/2003.

	PURPOSE OD PROCESSING	LEGAL BASIS	DATA RETENTION	NATURE OF PROVISION
	processing at any time, easily and free of charge.			
E.	Personnel selection in the area "work with us" to apply for personnel selections, carrying out the activity of research and selection of personnel for the purpose of the possible establishment of an employment relationship, including for any positions different from those for which the person concerned has spontaneously applied; preservation of personal data also for future selections; management of applications in response to job offers published on our website; interviews and any video interviews (data processing also of image/audio)	Art. 6 para. 1(b) of the	Maximum 24 months In principle, data collected during the recruitment process will be deleted as soon as it becomes apparent that no offer of employment will be made or that the offer will not be accepted by the candidate	The provision is necessary.  Failure to provide the necessary data will result in the inability to apply
F.	Handling of your requests and requests from other data subjects, pursuant to Art. 15 et seq. of the GDPR (rights of the data subject)	Legal obligation to which the data controller is subject (C45.) Art. 6 para. 1(c) GDPR)	5 years from the closing of the application, barring litigation	



# 3. TO WHOM WILL PERSONAL DATA BE COMMUNICATED?

Personal data will be communicated, according to the purposes envisaged in specific areas, to parties who will process the data as autonomous Data Controllers, or Data Processors (Art. 28 GDPR) and processed by individuals (Art. 29 GDPR) acting under the authority of the Data Controller and Data Processors on the basis of specific instructions given regarding the purposes and methods of processing, for specific purposes according to the area of reference. The data will be communicated to recipients belonging to the following categories:

- Subjects who provide services for the website and communication networks, including e-mail, host and website management (including Group companies, affiliates, subsidiaries);
- By area works with us, to subjects for the management of selection activities;
- Competent authorities for fulfillment of legal obligations and/or provisions of public bodies, upon request



The list of Data Processors is available by writing to <a href="mailto:privacy@3v-tech.com">privacy@3v-tech.com</a> or the other contact details above.



# 4. DOES THE DATA CONTROLLER TRANSFER DATA TO A THIRD COUNTRY AND/OR TO INTERNATIONAL

The personal data will not be transferred to non-EEA countries.



#### 5. ARE PERSONAL DATA PROCESSED BY AN AUTOMATED MEAN?

The personal data will be subject to traditional, and electronic processing. Please note that no fully automated decision-making processes are carried out.



#### 6. WHICH ARE YOU RIGHTS? HOW CAN YOU EXERCISE THEM?

You may assert your rights as expressed in Art. 15 et seq. GDPR, by contacting the Data Controller at the e-mail address <a href="mailto:privacy@3v-tech.com">privacy@3v-tech.com</a> or at the contacts listed above. You have the right, at any time, to request access to your personal data (art.15), rectification (art.16), deletion of the same (art.17), and restriction of processing (art.18). The data controller shall notify (art. 19) each of the recipients to whom the personal data have been transmitted of any rectification or erasure or restriction of processing carried out. The data controller shall notify the data subject of such recipients if the data subject so requests. In the cases provided for, you have the right to the portability of your data (art.20), in which case they will be provided to you in a structured, commonly used and machine-readable format. You have the right to object (art.21), at any time, to the processing of data based on legitimate interest.

In the event that the data subject believes that the processing of personal data carried out by the Data Controller is in violation of the provisions of Regulation (EU) 2016/679, the data subject has the right to lodge a complaint with the Supervisory Authority, in particular in the member state where he or she normally resides or works or in the place where the alleged violation of the regulation occurred (Privacy Guarantor https://www.garanteprivacy.it/), or to take appropriate legal action



# 7. INFORMATION NOTICE AMENDMENTS

The Data Controller reserves the right to amend, update, add or remove parts of this information notice. In order to facilitate the verification and modification of the text, the information notice will contain the date of update.

Date of update: 01/10/2025

Reg. Imprese Milano n. 04853800961 R.E.A n 1777029 MILANO Cod. Fisc e P. IVA 04853800961 Cap Soc. € 18.000.000.00 i.v.