

PRIVACY AND COOKIE POLICY WEBSITE
Information notice pursuant to art. 13 Regulation (EU) 2016/679 (GDPR)



WHY THESE INFORMATION

Pursuant to Regulation (EU) 2016/679 ("GDPR"), this page describes how personal data are processed. This information notice is provided pursuant to art. 13 GDPR and is not valid for other websites of third parties, which may be consulted through links on the present website. The Data Controller is not responsible for the websites of third parties.

Processable personal data

Personal Data: any information relating to an identified or identifiable natural person ("**data subject**"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person (Recital 26, 27, 30 GDPR).

Data relating to Contracting parties/Users

Navigation data

Computer systems and software procedures used to the operation of this website acquire, during their normal operation, some personal data whose transmission is implicit in the internet communication protocols. This information is not collected to be associated with identified data subject, but by their 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 computers used by users who connect to the site, URI (Uniform Resource Identifier) of requested resources, the time of the request, the method used to submit the request to the server, the size of the file obtained in reply, the numerical code indicating the status of the response from the server (successful, error, etc..) and other parameters regarding the operating system and computer environment. These data are used for the sole purpose of obtaining anonymous statistical information on the use of the site and to check its correct functioning and are deleted immediately after processing. The data will be used to foresee liabilities in case of computer criminal offences against this site.

Personal data provided by data subjects

The optional, explicit and voluntary sending of messages to the contact addresses indicated on this site results in the acquisition of the sender's address, necessary to reply to requests, as well as any other personal data provided.

Information on the processing of personal data by way of the social media platforms

As for the processing of personal data that is carried out by the social media platforms used by the Data Controller, please consider the information provided by those platforms through their privacy policies. The Data Controller processes the personal data provided by users through the social media pages in order to handle user interactions (comments, public posts, etc) in full compliance with the applicable legislation.

Specific information notices

Specific information notices may be present on the pages of this site in relation to particular services or processing of personal data provided.



Cookies

No personal data of users is obtained by this website. There is no use of any cookie for the transmission of personal information, nor so-called "persistent cookies" or systems for tracking users. The use of so-called "session cookies" (cookies that are not stored persistently on the user's computer and that will vanish when the browser will be close. Such cookies, in any case, are stored not more than seven days, except for any need of the Judicial Authority) is strictly limited to the transmission of session identifiers (consisting of random numbers generated by the server) necessary to enable the safe and efficient browsing of the website. The session cookies used in this website avoid the use of other computer techniques potentially prejudicial to the privacy of users' browsing and do not allow the acquisition of personal data.



1. DATA CONTROLLER AND CONTACT DETAILS





The Data Controller is **ITAL BROKERS S.P.A.**, with legal headquarter in Via Carducci 9, 20123 Milano - Italy, in person of its Legal Representative, phone **01031951**, e-mail **privacy@italbrokers.it**.







2. DATA PROTECTION OFFICER (DPO) AND CONTACT DETAILS

ITAL BROKERS S.P.A. has appointed a **DATA PROTECTION OFFICER (DPO)** pursuant to articles 37 – 39 GDPR. You can contact the DPO by sending an email to dpo.italbrokers@dpoprofessionalservice.it or at Data Controller's legal headquarter indicated above.

3. PURPOSES OF THE PROCESSING | LEGAL BASIS OF THE PROCESSING | DATA RETENTION | NATURE OF PROVISION OF PERSONAL DATA

 PURPOSE OF PROCESSING	 LEGAL BASIS	 DATA RETENTION	 NATURE OF PROVISION
<p>Website browsing. The browsing data will be processed also for the following purposes:</p> <ul style="list-style-type: none"> • statistical information on the use of the services (most visited pages, number of visitors and time range, origin, etc.); • check of the correct functioning of the services. The data will be used to foresee liabilities in case of computer criminal offences against this site. 	<p>Data processing is necessary for the purposes of pursuing the legitimate interests of the data controller or a third party, provided that the interests or the fundamental rights and freedoms of the data subject which require the protection of personal data do not prevail, having regard to the reasonable expectations of the data subject based on his/her relationship with the data controller. Activities strictly necessary for the operation of the site and the provision of the navigation services. (Art. 6, par. 1 lett. F and Recital 47 of the GDPR). Balancing test available upon request.</p>	<p>Until the duration of the browsing session and, in any case, no longer than seven days (except where judicial authorities need such data for establishing the commission of criminal offences).</p>	<p>The provision of data data is necessary for the browsing on this website.</p>
<p>Use of cookies and comparable technologies. This site uses only technical cookies that do not require consent.</p> <p>More information available above in the paragraph related to cookie</p>		<p>More information available above in the paragraph related to cookie</p>	<p>More information available above in the paragraph related to cookie</p>

Your personal data will also be processed for the following purposes:

 PURPOSES OF PROCESSING	 LEGAL BASIS	 DATA RETENTION	 NATURE OF PROVISION
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<p>A) CONTACT AND INFORMATION REQUESTS: collect and fulfill any user requests</p>	<p>Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (Recital 44) - art. 6 par. 1 lett. b) of the GDPR.</p>	<p>12 months</p>	<p>The communication of the data is necessary for the contract. The non provision of personal data may result the impossibility to obtain from the Data Controller the requested information</p>
<p>B) MANAGEMENT OF YOUR REQUESTS pursuant to art. 15 and seq. GDPR (data subject's rights)</p>	<p>The processing is necessary for compliance with a legal obligation, to which the Data Controller is subject to (Recital 45) - Art. 6 par. 1 lett. C of the GDPR).</p>	<p>5 years from the closure of the request, except disputes</p>	<p>The communication of personal data is necessary, because essential for the present legal Obligations. The non provision of personal data may result the impossibility to obtain from the Data Controller the requested information.</p>
<p>C) APPLICATION TO PERSONNEL SELECTION IN THE "WORK WITH US" AREA: research and selection of personnel with a view to the possible establishment of a working relationship, also for any positions other than those for which the data subject has spontaneously applied; conservation 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 including image/audio).</p>	<p>Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (art. 6 par. 1 lett. b) GDPR)</p>	<p>24 months</p>	<p>The provision of data is necessary. The non provision of personal data may result the impossibility to participate to the selection process.</p>
<p>D) The Data Controller, within the purpose of candidate selection activities, may view the candidate's publicly accessible "social profile" on social media/networks. The Data Controller may collect and process candidate's personal data to the extent that such collection is</p>	<p>Processing is necessary for the pursuit of the legitimate interests of the data controller or a third party, as long as the interests or fundamental rights and freedoms of the data subject requiring the protection of personal</p>	<p>In general, data collected during the selection process will be deleted as soon as it becomes clear that no job offer will be made or that the offer will not be accepted by the candidate. In any case, the maximum</p>	<p>The provision of data is optional. Failure to provide it will prevent the fulfilment of the legitimate interest of the Controller indicated in the purposes of this point. Refusal will</p>

necessary and relevant for the performance of the job. To this end, candidates may be asked to provide details of their profile contacts on social networks.	data do not prevail (C47-C50). Art. 6(1)(f) GDPR.	retention period is 24 months.	have to be balanced against the legitimate interest of the Controller indicated in the purposes of this point.
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4. RECIPIENTS OR CATEGORIES OF RECIPIENTS

Your personal data will be communicated to subjects who will process the data as Data Processor (art. 28 GDPR) and/or as individuals acting under the authority of the Data Controller and Data Processor (art. 29 GDPR), for the purposes listed above. In particular, the data may be communicated to recipients belonging to the following categories:

- Subjects -based in Italy- that provide services for the website and communication networks, including e-mail, host and website management;
- Freelancers, studies or companies within assistance and consulting relationships;
- For the sole purpose of research and selection of personnel (see the specific area), any third parties and labour consultants and companies for the purposes of personnel selection, as part of assistance and consulting relationships;
- Competent authorities for compliance with legal obligations and/or provisions of public bodies, upon request.

The list of Data Processors is constantly updated and available by writing to privacy@italbrokers.it or at the registered office of the Data Controller.



5. DATA TRANSFER TO THIRD COUNTRIES AND/OR INTERNATIONAL ORGANIZATION

Personal data provided will not be transferred outside the European Economic Area (EEA). In particular, data will be stored in Italy.



6. EXISTENCE OF AUTOMATED PROCESS

Personal data will be processed by electronic and automated means, but the Data Controller does not use decision-making processes based on a fully automatic elaboration.



7. DATA SUBJECT'S RIGHTS

You may exercise your rights as expressed in articles 15 seq. of the GDPR, by contacting the Data Controller at the email address privacy@italbrokers.it or by contacting the DPO at the email address dpo.italbrokers@dpoprofessionalservice.it. You have the right, at any time, to request the data Controller to access (art. 15), rectify (art. 16), cancel your personal data (art. 17) or limit their processing (art. 18). The controller shall communicate (art. 19) any rectification or erasure of personal data or restriction of processing carried out to each recipient to whom the personal data have been disclosed. The controller shall inform the data subject about those recipients if the data subject requests it. In the cases provided for, you have the right to the portability of your data (art. 20) and in this case the Data Controller will provide you with a structured, commonly used, and readable form of your personal data electronically. In addition, you have the right to object (art. 21), at any time, to the processing of your data and you When data processing relies on legitimate interest, information on the relative balancing test is available upon request. Without prejudice to any other administrative and judicial remedy. if you believe that the processing of data concerning you violates the provisions of the GDPR, you have the right to lodge a complaint with the Italian Data Protection Authority (https://www.garanteprivacy.it/web/guest/home_en).



8. CHANGES OF THE PRIVACY POLICY

The Data Controller reserves the right to modify, update, add or remove portions of the current Privacy Policy at his discretion and at any time. For this reason, this privacy policy contains an indication of the last update.

Last update: January 25th 2024

