

PRIVACY POLICY - WEBSITE

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This Privacy Policy is provided pursuant to Article 13 of Regulation (EU) 2016/679 and refers to the personal data processed following consultation of the website https://essegi-system.com and not for other websites that may be consulted by the user via links.

Data Controller

The Data Controller is **ESSEGI SYSTEM SERVICE S.R.L.**, Via Zambon, 14/16, 36051 Creazzo, Vicenza, Italy, e-mail: info@essegi-system.com.

Types of Data Processed

i. Browsing Data

The computer systems and software procedures used to operate this website acquire, during their normal operation, certain personal data whose transmission is implicit in the use of Internet communication protocols. This information is not collected to be associated with identified data subjects, but by its nature could, through processing and association with data held by third parties, allow users to be identified. These data are used solely to obtain anonymous statistical information on the use of the site and to check its correct functioning.

ii. Data Provided Voluntarily by the User

The optional, explicit, and voluntary sending of e-mails to the addresses indicated on this site entails the subsequent acquisition of the sender's address, necessary to respond to requests, as well as any other personal data included in the message.

iii. Cookies

Cookies and similar devices are used to facilitate site navigation. Please refer to the dedicated **Cookie Policy** for further information on the cookies and similar tools we use, their purposes, and other relevant details.

Purpose and Legal Basis of Processing

Personal data of individuals browsing the Site or completing forms on the Site will be lawfully processed by the Data Controller pursuant to Article 6 of the Regulation for the following purposes:

- a) <u>Site navigation</u> in relation to the possibility of detecting technical data necessary during navigation (Art. 6(1)(b) GDPR);
- b) Responding to information requests received via published contacts or the contact form (Art. 6 (1)(b) GDPR);
- c) <u>Legal obligations</u> to comply with obligations established by law, by an Authority, by a regulation, or by EU legislation (Art. 6(1)(c) GDPR);
- d) <u>Safeguarding the Controller's rights</u> based on the legitimate interest of **Essegi System Service S.r.l.** (Art. 6(1)(f) GDPR).

Providing data for the above purposes and for the functioning of the Site pages is necessary. Failure to provide data will make it impossible for the Controller to ensure optimal navigation and use of the site's features.

Data Retention Period

- <u>Website operation and related services</u>: browsing data and cookies are retained for the time necessary to provide the services of the Site.
- <u>Information requests</u>: personal data voluntarily provided by the user are retained to respond
 to product/service inquiries and, after fulfilling the request, for the ordinary limitation period.
 After these retention periods, data will be destroyed or anonymized, in line with technical



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deletion and backup procedures and accountability requirements of Essegi System Service S.r.l.

- <u>Legal obligations</u>: personal data related to legal obligations will be retained for the time required by law.
- <u>Controller's rights</u>: personal data in this category are retained for the duration of the claim and/or out-of-court or judicial proceedings until the expiry of the terms for judicial remedies and/or appeals.

Processing Methods

Personal data are processed using automated tools for the time strictly necessary to achieve the purposes for which they were collected. Specific security measures, as required by Art. 32 of Regulation (EU) 2016/679, are observed to prevent data loss, unlawful or incorrect use, and unauthorized access.

Information shared with Third Parties

For the purposes indicated in this notice, personal data may be processed by internal staff of **Essegi System Service S.r.l.**, authorized for processing, or communicated to third parties collaborating with the Controller, duly appointed as processors, such as suppliers, collaborators, and partners providing marketing, advertising, or technological services.

Data Subject Rights

Pursuant to Articles 15 et seq. of Regulation (EU) 2016/679, individuals whose personal data are processed have the right, in the cases provided, at any time to obtain confirmation of the existence of such data, to know their content and origin, verify their accuracy or request their integration, updating, or rectification, request their deletion, anonymization, or blocking of data processed unlawfully, as well as to object, for legitimate reasons, to their processing.

Requests should be addressed to the Data Controller at the above contact details.

The data subject also has the right to lodge a complaint with the supervisory authority in Italy, represented by the Data Protection Authority (**Garante per la protezione dei dati personali**, www.garanteprivacy.it).

Updates and changes to the Privacy Policy

This Privacy Policy was updated in November 2025; the Controller reserves the right to modify or simply update its content, in whole or in part, also due to changes in applicable legislation. The Controller invites all users to regularly visit this section to review the most recent and updated version of the Privacy Policy.