

## **D-Orbit SpA**

Viale Risorgimento, 57 - 22073 To Mornasco (CO) VAT No. 07373150965 PRIVACY POLICY Ver. 9.0 of 20-03-2019 Page 1 of 2

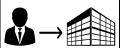
## WEBSITE PRIVACY POLICY

**Dear** User, **D-Orbit SpA** has great respect for the privacy of its users. The data that may be communicated by the user through the Site will be treated with the utmost care and with all the tools necessary to ensure its security, in full compliance with current legislation protecting the confidentiality of data. We wish to inform you that the "European Regulation 2016/679 on the protection of individuals with regard to the Processing of Personal Data and on the free movement of such data" (hereinafter "GDPR") provides for the protection of individuals with regard to the processing of personal data as a fundamental right. In accordance with Article 13 of the GDPR, therefore, we inform you that:

- **A. CATEGORIES OF DATA: the** object of the processing may be your personal data such as:
- a. Data collected automatically. The computer systems and applications dedicated to the functioning of this website collect, during their normal operation, some data (whose transmission is implicit in the use of Internet communication protocols) potentially associated with identifiable users. Among the data collected are IP addresses and domain names of the computers used by users connecting to the site, URI (Uniform Resource Identifier) addresses of the resources requested, 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 regarding the operating system, browser and computer environment used by the user, name of the internet service provider (ISP), date and time of visit, web page of origin (referral) and exit.
- b. Data provided voluntarily by the user. The voluntary and explicit sending of electronic mail to the addresses indicated in the different access channels of this site does not imply a request for consent and involves the acquisition of the sender's address and data, necessary to respond to requests, as well as any other personal data included in the message. Such data are understood to be voluntarily provided by the user at the time of requesting the service. By entering a comment or other information the user expressly accepts the privacy policy, and in particular agrees that the contents entered are also freely distributed to third parties. On the contrary, specific summary information will be reported or displayed on the pages of the site prepared for particular services on request (form). The user must therefore explicitly consent to the use of the data contained in these forms in order to send the request.
- c. Cookies. The site does not use/uses cookies. The data collected through cookies may be used to access parts of the site or for statistical purposes or to make your browsing experience more enjoyable and more efficient in the future, trying to assess user behavior and to modify the offer of content according to their behavior. A cookie policy is available for further information.
- d. Plug-in. The site also does not embed/incorporate plugins and/or buttons for social networks, in order to allow easy sharing of content on your favorite social networks. These plug-ins are programmed so as not to set any cookies when accessing the page, in order to safeguard users' privacy. Cookies are only set, if so provided by social networks, when the user makes effective and voluntary use of the plug-in. Please note that if the user is logged into the social network, then he or she has already consented to the use of cookies transmitted through this site when subscribing to the social network. The collection and use of information obtained through the plug-in is governed by the respective social network privacy policies, to which you should refer.



**B. DATA CONTROLLER:** the data controller ("Data Controller") is **D-Orbit SpA, Viale Risorgimento, 57 - 22073 Fino Mornasco (CO), VAT number 07373150965, which can be** contacted by telephone on **02.37920900** or by e-mail at **privacy@dorbit.space.** 



**C. SOURCE OF PERSONAL DATA:** The personal data held by the Owner are collected directly from the person concerned.



- **D. PURPOSES OF DATA PROCESSING AND LEGAL BASIS:** the processing of your data has as its purpose and legal basis:
- 1. <u>For data collected automatically</u>, the legal basis is the legitimate interest of the owner and the purpose is to ensure and improve the web browsing experience.
- 2. <u>For data provided voluntarily by the user</u>, the legal basis is consent and, for sending e-mails to our addresses, the purpose is to be able to send answers to specific requests made by the user; for forms the purpose is indicated in the specific information.
- 3. <u>For cookies and plug-ins:</u> compare the specific cookies policy.



**E. DATA CONTROLLERS:** within the limits relevant to the processing purposes indicated, your data may be communicated to partners, consulting companies, private companies, third party technical service providers, hosting providers, IT companies, communication agencies,...



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**F. TRANSFER OF DATA TO THIRD COUNTRIES: There are** no plans to transfer your data to a third country/This site may share some of the data collected with services located outside the European Union. In particular through social plug-ins and the Google Analytics service. The transfer is authorized and strictly regulated by Article 45, paragraph 1 of EU Regulation 2016/679, so it does not require specific authorization.



**G. CONSERVATION PERIOD:** according to the principle of limitation of conservation (art.5, GDPR), a verification of the obsolescence of the data stored in relation to the purposes for which they were collected is carried out periodically. In particular:

the data collected automatically are processed, for the time strictly necessary, for the sole purpose of obtaining statistical information on the use of the site and to check its regular operation, also for security purposes or according to the deadlines required by law.

The data provided voluntarily by the user will be stored for a period of time not exceeding the achievement of the purposes for which they are processed or in accordance with the deadlines set by law.



**H. RIGHTS OF THE INTERESTED PARTIES:** the interested party has always the right to request from the Data Controller access to your data, the rectification or cancellation of the same, the limitation of the processing or the possibility to oppose the processing, to request the portability of the data, to revoke the consent to the processing by asserting these and other rights provided by GDPR by simple communication to the Data Controller. The data subject may also lodge a complaint with a supervisory authority.



**I. OBLIGATIONS OR LESS THAN THE CONFERENCE:** the provision of your data is mandatory during the navigation of our website with regard to points D.1 and D.2 of the above mentioned purposes, in order to allow the correct provision of the service. The provision of your data for point D.3 is instead optional and will not compromise in any way the provision of the service.



J. DATA PROCESSING METHODS: the personal data provided by you will be processed in compliance with the above mentioned regulations and the confidentiality obligations that inspire the activity of the Owner. The data will be processed both with IT tools and on paper and any other type of suitable support (e.g. cloud systems, storage and digital replacement storage systems), in compliance with adequate technical and organizational security measures provided for by GDPR.



**K. FINAL NOTES AND UPDATE MODES:** the information is provided only for this website and not for other websites that may be consulted by the user through links contained in this website. The information may be subject to changes due to the introduction of new regulations in this regard, we therefore invite the user to periodically check this page to be always updated on the latest legislative news. The previous versions of this information may always be requested from the Data Controller.



**M. AUTOMATED DECISIONAL PROCESSES:** No automated decision-making processes / Automated decision-making processes are foreseen.