PRIVACY POLICY

Information notice pursuant to Article 13 of the REGULATION (EU) 2016/679 (GDPR)



Why this information

Pursuant to Regulation (EU) 2016/679 (hereinafter, "GDPR"), this page describes how personal data are processed. This information is provided pursuant to Article 13 of GDPR and is not to be considered valid for other third-party websites that may be reached through links on this website, for which no liability is accepted

Personal data processed

Personal data: any information concerning an identified natural person, with particular regard to an identifier such as the name, the identification number, location data, the online identifier or to one or more elements regarding its physical, physiological, genetic, mental, economic, cultural or social identity

Personal data of users/contractors

Browsing data

The computer systems and software procedures in charge of this site's operation acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols. This category of data includes the IP addresses or the domain names of the computers and terminals used by users, the URI/URL (Uniform Resource Identifier/Locator) form 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 (done, error, etc.) and other parameters concerning the user's operating system and computer environment.

Data supplied voluntarily by the user

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 entail the subsequent acquisition of the sender's address, necessary in order to reply to the requests, as well as of any other personal data entered in the message.

Information on the processing of personal data carried out through Social Media platforms

With regard to the processing of personal data carried out by the managers of the Social Media platforms used by the Controller, please see the information provided by them in their respective privacy policies. Data controller processes the personal data provided by the users through the pages of the dedicated Social Media platforms, to manage the interactions with the users (comments, public posts, etc.) and in compliance with the laws in force.

Specific information

Specific information can be found in the following sections of the Site in relation to particular services or processing of the data provided:

- Configurator;

- Work with us;

Cookies and other tracking systems. What are they? What are they used for?

For information on cookies and other tracking systems, please see the Cookie Policy in the footer of the Website and at the following link.

OTHER TRACKING TECHNOLOGIES

Email tracking pixels

Emails may contain tracking technologies, such as tracking pixels. These are small images, usually transparent and invisible to the user, embedded in the message and loaded from an external server when the email is opened.

Loading the pixel may allow the sender to obtain certain information about the receipt and use of the message, such as whether and when the email was opened, the number of times it was opened, the device or application used to view it and, in some cases, the IP address.

Tracking pixels may be used for various purposes, including checking that communications have been received correctly, preventing spam, phishing or other security incidents, providing services requested by the user, or generating statistics on the effectiveness of communications.

Where tracking is used for direct marketing purposes and enables the behaviour of individual recipients to be monitored, processing is based on consent pursuant to Article 6(1)(a) of the GDPR. Consent to tracking may be obtained together with consent to marketing communications, without prejudice to the right to withdraw it at any time, including separately where technically possible.

Consent is not required, however, where the use of tracking pixels falls within the circumstances provided for by applicable law, for example where it is necessary to transmit a communication, provide a service requested by the user, or meet specific security, authentication or fraud prevention needs, or to produce aggregated and anonymous statistics.

In such cases, any personal data collected through the pixel will be processed on the alternative legal basis applicable to the specific purpose, such as the performance of a contract, the pursuit of a legitimate interest or compliance with a legal obligation.



1.WHO IS THE DATA CONTROLLER? HOW CONTACT HIM?

Data Controller is **Capardoni Srl** L with registered office in Gorgonzola Via Buonarotti, 55 - in the person of its Legal Representative pro-tempore, who you can contact for any information by phone a +39 02 95102399 and email at the following address: privacy@capardoni.com

2. PURPOSES OF THE PROCESSING, LEGAL BASIS, DATA RETENTION, NATURE OF THE PROVISION

PURPOSES OF THE PROCESSING	**LEGAL BASIS**	DATA RETENTION	**NATURE OF THE PROVISION**
A) Navigation on this website. The data required to use the web services are processed for the purpose of: -obtaining statistical information on the use of the services (most visited pages, number of visitors per time slot or per day, geographical areas of origin, etc.); -to check the correct functioning of the services.	Processing is necessary for the purposes of the legitimate interests pursued by the data controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, taking into consideration the reasonable expectations of the data subject and the activities that are strictly necessary for the operation of the site or for browsing it (Art. 6, par. 1 lett. f and C47 of GDPR).	Navigation data will be retained for the whole duration of the browsing session	The provision of data is necessary to browse the website.
Use of cookies and similar technologies. Please, refer to the cookies policy in the Site footer	See the cookie policy in the site footer	See Cookie Policy in the Site footer	See Cookie Policy in the Site footer
In addition to navigation, personal data will be processed for:			
PURPOSES OF THE PROCESSING	**LEGAL BASIS**	DATA RETENTION	**NATURE OF THE UNDERWRITING**
A) Any contact request or information by fulfiling of the form in the “contact” section	Processing is necessary for the performance of a contract to which the data subject is party or in order to take	24 months maximum	The provision of data is necessary. Failure to provide

PURPOSES OF THE PROCESSING	LEGAL BASIS	DATA RETENTION	NATURE OF THE PROVISION
	steps at the request of the data subject prior to entering into a contract (C44) art. 6 par. 1 lett. b) of GDPR.		the necessary data will result in the impossibility of being contacted and receiving information.
B) DIRECT MARKETING, for sending promotional offers and newsletters, by automated tools (electronic mail, SMS) and traditional tools, by fulfiling the forms in the "contacts" "newsletter" "configurator" sections of the web site. The Controller uses reporting tools (email tracking pixels) to compare and, where appropriate, improve the performance of automated communications. Tracking pixels enable the Controller to obtain information such as: the number of readers, opens, unique users who clicked on links, and clicks; the devices and operating systems used to read the communication; details of individual users' activity; and details of emails sent, delivered, undelivered and forwarded. All these data are used to compare and, where appropriate, improve the performance of communications.	Processing is based on consent to the processing of personal data (C42, C43) art. 6 par. 1 letter a) of GDPR and art.122 of Privacy Code	Until users' objection (opt-out)	The provision of data is not mandatory. Failure to provide the necessary data will result in the impossibility to receive personalised offers and newsletters
C) Handling your requests pursuant to art. 15 et seq. of GDPR (rights of the data subject)	The processing is necessary for compliance with a legal obligation to which the Data Controller is subject to. (C45) Art. 6 para. 1 letter c) of GDPR.	5 years after closing of the claim, unless in dispute	The provision of data is mandatory, in order to be able to execute legal obligations
D) SAVING OF THE CHOSEN CONFIGURATIONS with subsequent receipt of newsletters and promotions relating to Capardoni's products, by automated tools (e-mail, SMS) and traditional tools (telephone and paper mail), by fulfiling the form in the "configurator" section. See specific information in the configurator section	Processing is based on consent to the processing of personal data (C42, C43) art. 6 par. 1 letter a) of the GDPR Until consent is revoked (or opt-out).	Until users' objection (opt-out)	The provision of data is not mandatory. Failure to provide the necessary data will result in the impossibility to save the chosen configurations and to receive customised offers and newsletters

PURPOSES OF THE PROCESSING	LEGAL BASIS	DATA RETENTION	NATURE OF THE PROVISION
E) RECEIVING A CUSTOMISED OFFER in relation to the chosen configuration saved as per point D), by filling in the form in the "configurator" section,	The processing is necessary for the performance of pre-contractual measures taken at the request of the data subject (C44), Article 6(1)(b) of the GDPR	Maximum 24 months.	The provision of data is Mandatory. Failure to provide the necessary data will result in the impossibility to receive customised offers
F) SELECTION OF PERSONNEL to apply for personnel selections; management of applications in response to job offers published on our Web site; interviews and any video interviews (data processing, including image/audio). See specific information in the "work with us" section.	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 (C44) art. 6 par. 1 lett. b) of GDPR	Maximum 24 months. In general, data collected during the recruitment 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	The provision of data is Mandatory. Failure to provide the necessary data will result the impossibility to receive your application

3. RECIPIENTS OR CATEGORIES OF RECIPIENTS

Personal data will be communicated to subjects who will process the data as independent Data Controllers, or Data Processors (Article 28 GDPR) and processed by individuals (Article 29 GDPR) acting under the authority of the Data Controller and the Data Processors on the basis of specific instructions provided for the purposes and methods of processing. The data will be communicated to recipients belonging to the following categories:

- subjects based in Italy who provide services for the web site and networks (including e-mail, websites and / or web platforms);
- Competent authorities for the fulfillment of legal obligations and / or provisions of public bodies, upon request.

The list of Data Processors art. 28 is available by writing to privacy@capardoni.com or to the other contacts above mentioned.

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

Personal data will not be transferred to non-EEA countries. In particular, it should be noted that the data will be stored in Italy for the purpose of hosting, managing, developing and maintaining the Site. All third parties to whom the data may be communicated are based in Italy.

5. AUTOMATED PROCESS

Personal data will be subjected to traditional, electronic and automated manual processing. It should be noted that fully automated decision-making processes are not carried out.

6. DATA SUBJECT RIGHTS

You can exercise the rights perusant Articles. 15 and s.s. GDPR, by writing to privacy@capardoni.com or to the others contacts above mentioned. You have the right, at any time, to request access to your personal data (art.15), rectification (art.16), cancellation of the same (art.17), limitation of processing (art.18). The data controller communicates (art. 19) to each of the recipients to whom the personal data have been transmitted any corrections or cancellations or limitation of processing (art.18). The data controller communicates to each of the recipients to whom the personal data have been transmitted any corrections or cancellations or limitations of the processing carried out. The data controller shall notify the data subject of these recipients if the data subject so requests. In the cases provided for, you have the right to the portability of your data (art.20) and in this case they will be provided to you in a structured format, commonly used and readable, by automatic device. You have the right to object in the cases provided for (art.21), at any time, to the processing of data based on legitimate interest by writing to the contacts above with the subject "opposition" and in cases where the legal basis is consent, you have the right to revoke the consent given without prejudice to the lawfulness of the processing based on consent before revocation.

In order to stop receiving automated direct marketing communications (e-mails, SMS messages, instant messaging), send an e-mail to privacy@capardoni.com with the subject line "unsubscribe from automated" or use our automatic unsubscribe systems for e-mails only (opt-out).

In order to stop receiving traditional direct marketing communications (telephone calls with an operator and paper mail), please write an email to privacy@capardoni.com with the subject line "unsubscribe from traditional".

In order to stop receiving marketing communications, please send an e-mail to privacy@capardoni.com with the subject line "unsubscribe marketing".

The management of consent for pixel tracking takes place through the Footer of the email communications you will receive or alternatively by writing an e-mail to the address privacy@capardoni.com

In the event that you believe that the processing of personal data carried out by the Data Controller is in violation of the provisions of Regulation (EU) 2016/679, as data subject you have the right to lodge a complaint with the Supervisory Authority, in particular in the Member State in which he habitually resides or works or in the place where the alleged violation of the regulation has occurred (Privacy Guarantor https://www.garanteprivacy.it/), or to refer the matter to the appropriate courts.

7. AMENDMENTS TO THIS INFORMATION NOTICE

Data controller may change, modify, add or remove any part of this Information. In order to facilitate the verification of any changes, the information will contain the indication of the date of update of the information itself.

Date of last update October 2026