# PRIVACY POLICY

# Privacy Policy made pursuant to EU Regulation 679/2016 General Data Protection Regulation

## General introduction

According to the indicated regulations, the processing of data will be based on the principles of correctness, lawfulness, transparency and protection of confidentiality and user rights.

This information for users / visitors who interact with the website www.deepvisionconsulting.com is made pursuant to EU Regulation 2016/679 relating to "natural persons with regard to the processing of personal data and the free movement of such data" and to cookie legislation on the network and in particular the issuance of the Provision of the Privacy Guarantor of 8 May 2014 "Identification of the simplified procedures for the information and the acquisition of consent for the use of cookies" and the subsequent "Clarifications on the implementation of the legislation on cookies "issued on 5 June 2015.

The same describes exclusively the methods of managing the site, with reference to the processing of personal data of users / visitors who consult it, and not also of external websites can be consulted by users by clicking on the links on this site.

Additional information may be provided in specific sections.

# 1 - Type of data processed and purpose of the treatment

#### 1.1 - Navigation data

The computer systems and applications dedicated to the functioning of this website acquire, during their normal operation, some personal data whose transmission is implicit in the use of protocols of Internet communication.

These information that are not collected to be associated with identified interested parties, but which by their very nature could, through processing and association with data held by third parties, allow users / visitors to be identified.

The data collected include the IP addresses or domain names of the computers used by users who connect to the site, the addresses in URI (Uniform Resource Identifier) notation of the requested resources, the time of the request, the method used in submitting the request to the server, the size of the file obtained in response, the numeric code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the operating system and the user's computer environment.

These data are processed, for the time necessary to achieve the purpose for which they are collected, for the sole purpose of obtaining anonymous statistical information on the use of the site (access to it) and to check its regular functioning.

The data could be used to ascertain responsibility in case of hypothetical computer crimes against the site.

# 1.2 - Data provided voluntarily by the user

Sending e-mail messages to the addresses indicated on this site (for example in order to request information) involves the acquisition of the sender's address, as well as any other personal data included in the messages. These data will be processed only for the purpose of processing the request and communicated to third parties only in cases where this is necessary for the fulfillment of the same (e.g. shipping service of the requested documentation).

If users / visitors are required to provide their personal data to access certain services, specific and detailed information on the relative treatment will be released in the pages relating to the individual services, in accordance with current legislation which will specify limits, purposes and methods. of the treatment itself.

#### 1.3 - Cookie

#### **Description of Cookies**

Cookies are small text files that are sent by the website visited by the user on the user's device (usually to the browser), where they are stored so that this device can be recognized on the next visit of the user on the site.

In fact, at each subsequent visit, cookies are sent back from the user's device to the site.

Cookies can be "installed" (more precisely, stored and accessed), however, not only by the same operator of the site visited by the user (first-party cookies), but also by a different site that "installs" cookies through the first site (third party cookies) and is able to recognize them.

This happens because on the visited site there may be elements (images, maps, sounds, links to web pages of other domains, etc.) that reside on servers other than that of the visited site.

## Based on the purpose, cookies are divided into technical cookies and profiling cookies.

Technical cookies are "installed" for the sole purpose of "carrying out the transmission of a communication over an electronic communications network, or to the extent strictly necessary for the provider of an information society service explicitly requested by the subscriber or user to provide this service ".

They are usually used to allow efficient navigation between pages, store user preferences (e.g. font size, language, country, etc.), store information on specific user configurations, manage authentication, etc.

Some of these cookies (called essential or strictly necessary), such as session cookies used to manage the shopping cart on e-commerce sites, enable functions without which it would not be possible to carry out some operations.

# The use of technical cookies does not require users' consent.

Technical cookies are assimilated (and, therefore, for their installation, users' consent is not required, nor are further regulatory requirements) so-called "analytics" cookies that are used to monitor the use of the site by users for purposes of optimization of the same - if used directly from the first part site (without, therefore, the intervention of third parties), as well as analytical cookies made and made available by third parties and used by the first part site for mere statistical purposes, if suitable tools are adopted to reduce their identification power (for example, by masking significant portions of the IP address) and the third party expressly undertakes not to "cross" the information contained in these cookies with others available to it.

Profiling cookies are used to track user navigation and analyze his behavior for marketing purposes and are aimed at creating user profiles and are used in order to send advertising messages in line with the preferences expressed by the same in the context surfing the net.

These cookies can be installed on the user's terminal only if the latter has given his consent in the manner indicated in the Provision. Based on their duration, cookies are divided into persistent, which remain stored, until their expiry, on the user's device, save removal by the latter, and session, which are not persistently stored on the device of the user and disappear when the browser is closed. Usually, profiling cookies are persistent cookies.

#### Cookies used on this site

This site uses technical cookies and third-party profiling cookies, to allow safe and efficient navigation on the site, monitor its operation and carry out remarketing campaigns.

Third-party profiling cookies used on this site, please refer to the pages of the suppliers:

<u>Facebook</u>

Google

Linkedin

The website also uses Google Analytics cookies in order to monitor and verify the use of the website made by the user. Thanks to Google Analytics, the Owner is able to know the total number of times the user opens a multimedia content, both text and audio and video, the number of people who open and close it before it is finished. In order to obtain more information about the activities carried out by Google Analytics you can click on the following link: https://support.google.com/analytics/

#### How cookies are deleted

It should be noted that by default almost all web browsers are set to accept automatically first-party cookies.

Browsers can, in any case, change the default configuration through the browser settings; disabling / blocking cookies or deleting them may, however, preclude optimal use of the site or of some areas of the same. The way in which cookies are managed depends on the type of browser used, and often on the specific version of the same.

Usually, in any case, it is necessary to access the browser settings and intervene on the preset rules, deciding which types of cookies to disable and / or removing the existing ones. Detailed information on the procedure for configuring cookie settings can be found in the guides of the browser used (generally accessible from a PC using the F1 key or by clicking on the question mark icon generally present within the browser itself).

Please also refer to the cancellation guides of the main browsers and to the following links:

Google Chrome https://support.google.com/accounts/answer/61416?hl=it

Firefox https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences

Internet Explorer https://support.microsoft.com/it-it/help/17442/windows-internet -explorer-delete-manage-cookies

Opera <a href="https://support.microsoft.com/it-it/help/17442/windows-internet-explorer-delete-manage-cookies">https://support.microsoft.com/it-it/help/17442/windows-internet-explorer-delete-manage-cookies</a>

Safari <a href="https://support.apple.com/kb/ph21411?locale=it\_IT">https://support.apple.com/kb/ph21411?locale=it\_IT</a>

Safari iOS (mobile devices) https://support.apple.com/en-us/HT201265

#### 2 - Processing methods

The processing of personal data is carried out through automated tools (e.g. using electronic procedures and media) and / or manually (e.g. on paper) for the time strictly necessary to achieve the purposes for which the data were collected and, in any case, in compliance with the provisions current regulations on the matter.

The data processing will also be carried out with organizational and processing logics strictly related to the purposes themselves and in any case in order to guarantee the security, integrity and confidentiality of the data in compliance with the organizational, physical and logical measures provided for by the current provisions.

## 3 - Optional supply of data

Except as specified above for navigation data and cookies, the visitor is free to provide personal data or not, as in the case of requests for information or contact sent by e-mail or requests for access to freely chosen services, utilities and applications.

Failure to provide them may make it impossible to obtain what has been requested and may preclude Deep Vision Consulting srl from the possibility of fulfilling the contractual obligations as required by the mandate contract.

## 4 - Owner, managers and categories of agents

The Owner of the processing of personal data is Deep Vision Consulting srl with headquarters in Modena Viale Vittorio Veneto n.2. The treatments connected to the web services of this site are handled exclusively by technical personnel in charge of the treatment. In addition to the owner's employees, some personal data processing operations may also be carried out by third parties, to whom the company entrusts the management / maintenance of the site. In this case, the same subjects will be appointed as Data Processors. Information relating to data processors can be easily found by sending an email to amministrazione@pec.deepvisionconsulting.com or by writing to: Deep Vision Consulting srl - Viale Vittorio Veneto 2, 41124 Modena.

The data will not be disclosed.

## 5 - Rights of the interested

The subjects to whom the personal data refer have the right, at any time, to obtain confirmation of the existence of that data and to know its content and origin, to verify its accuracy or request its integration or updating, or rectification.

The interested parties also have the right to request the cancellation, transformation into anonymous form or blocking of data concerning them, processed in violation of the law, and to oppose in any case, for legitimate reasons, to their treatment.

Pursuant to art. 13 EU GDPR the subjects to whom the data refer always have the right to know the identity and contact details of the Data Controller and if necessary of its representative, the contact details of the data protection officer, the purposes of the processing for which personal data are intended as well as the legal basis of the processing, the legitimate interests pursued by the Data Controller or

by third parties appointed as owners, any recipients or categories of recipients of personal data, the data retention period and the intention of the Owner of the processing of transferring personal data to a third country or to an international organization.

The subjects to whom the data refer, pursuant to Art. 13 GDPR UE 679/2016 can also at any time exercise the right to:

- have access to personal data
- obtain the correction or cancellation of the same or limitation of the processing that concern them
- oppose the processing of data
- use the portability of the data
- withdraw consent at any time without prejudice to the lawfulness of the treatment based on the consent given before the revocation
- propose a complaint to a supervisory authority, for Italy Privacy Guarantor
- be informed about the possibility that the communication of personal data may be a legal or contractual obligation or a necessary requirement for the conclusion of a contract, and to know if the interested party has the obligation to provide personal data as well as the possible consequences of the failure to communicate such data
- be informed about the existence of an automated decision-making process, including profiling and in such cases, receive significant information on the logic used, as well as on the importance and expected consequences of such treatment for the interested party.

Pursuant to art. 14 EU GDPR if the data have not been obtained from the interested party, the Data Controller Deep Vision Consulting srl will provide the interested party with the following information:

- a) the identity and contact details of the Data Controller and, where applicable, of the its representative
- b) the contact details of the data protection officer, where applicable
- c) the purposes of the processing for which the personal data are intended as well as the legal basis of the processing
- d) the categories of personal data in question
- e) any recipients or any categories of recipients of personal data
- f) where applicable, the intention of the Data Controller to transfer personal data to a recipient in a third country and the existence or the absence of an adequacy decision by the European Commission or, in the necessary cases, the reference to adequate or appropriate guarantees and means to obtain a copy of such data or the place where it was made available.

In addition to the information referred to in paragraph 1, the Data Controller will provide the interested party with the following information necessary to ensure correct and transparent treatment towards the interested party:

- a) the retention period of personal data or, if it is not possible, the criteria used to determine this period
- b) the legitimate interests pursued by the data controller or by third parties
- c) the existence of the right of the interested party to ask the data controller for access to personal data and their correction or cancellation or the limitation of the processing of personal data concerning him and to oppose their processing, in addition to the right to data portability
- d) the existence of the right to withdraw consent at any time without prejudice to the lawfulness of the treatment based on consent before revocation
- e) the right to lodge a complaint with a supervisory authority (for Italy the Privacy Guarantor)
- f) the source from which the personal data come and, if applicable, the possibility that the data come from sources accessible to the public originate
- g) the existence of an automated decision-making process, including profiling and, at least in such cases, significant information on the logic used, as well as the importance and expected consequences of such treatment for the data subject;

The Data Controller Deep Vision Consulting srl provides the information referred to in paragraphs 1 and 2:

- a) within a reasonable period of obtaining personal data, but at the latest within a month, in consideration of the specific circumstances in which the personal data are processed
- b) if the personal data are intended for communication with the interested party, at the latest at the time of the first communication to the interested party; or if communication to another recipient is envisaged, no later than the first communication of personal data.

If the Data Controller intends to further process personal data for a purpose other than that for which they were obtained, before this further processing it will provide the interested party with information on this different purpose and any relevant information referred to in paragraph 2.

For any information regarding the processing of data, users can send an email to amministrazione@deepvisionconsulting.com or write to Deep Vision Consulting srl - Viale Vittorio Veneto 2, 41124 Modena

This Privacy Policy is subject to updates