

PRIVACY POLICY

Information on the processing of personal data pursuant to Article 13 of Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data (GDPR).

1. Data Controller and Data Protection Officer

This privacy notice ("Privacy Notice") is provided by the OQEMA Group company, OQEMA S.p.A., with its registered office at Centro Direzionale Milanofiori street 1 Building F3 - 20057 Assago, VAT number 00080290182 (hereinafter also referred to as OQEMA) as the Data Controller (hereinafter "Controller" or "Company") and applies to the users of this website (hereinafter "Site")

This Privacy Policy aims to provide the main information regarding the methods used to collect and process Users' personal data in compliance with the provisions of the GDPR, Legislative Decree No. 196/2003 (and subsequent amendments), relevant measures and guidelines from national and European data protection authorities, as well as applicable national and European legislation (collectively, "Applicable Law").

The Data Controller ensures that the processing of data, in protection of individuals, is carried out in accordance with the rights and fundamental freedoms, as well as the dignity of the data subject, with particular reference to privacy, personal identity, and the right to the protection of personal data.

The use of the Site is possible without providing personal data; however, if users wish to use special business services through the Site, it may be necessary to process personal data. Some services we offer may be subject to specific notices; in such cases, we will take care to provide all relevant information from time to time.

OQEMA has not appointed a Data Protection Officer (DPO) in accordance with Article 37 of the GDPR. Therefore, it will be possible to contact the Data Controller for issues related to data processing at the following address: privacy@oqema.com.

2. Categories of data processed, purposes of processing and legal bases

We will process your personal data, both manually and automatically, for the purposes and according to the legal bases described below.

Purposes	Legal Basis	Categories of data processed
a) To allow you to use the Site.	Execution of pre-contractual measures taken at the request of the data subject and execution of a contract to which the data subject is a party (art. 6(1)(b) GDPR). The provision of personal data is necessary for this purpose. If the data is not provided, it will not be possible to allow navigation and access to the content.	Details about the web browser used, the IP address and any additional data related to browsing.
b) To fulfill legal obligations and respond to requests from competent authorities.	Compliance with a legal obligation to which we are subject (Article 6(1)(c) GDPR). The provision of personal data is necessary for this purpose. In case of non-provision, there will be no consequences of any kind for you.	Any information that may be required by law or to respond to requests received from the competent public authority.
c) To protect our rights in judicial and extrajudicial proceedings.	Pursuit of our legitimate interest or that of third parties (Article 6(1)(f) GDPR). The provision of personal data is	Any information necessary to ensure compliance with this purpose.

	necessary for this purpose. You may object to the processing carried out for this purpose at any time.	
d) To carry out extraordinary operations related to the Data Controller (including mergers, acquisitions, transfers, corporate reorganizations, business restructurings), to the extent strictly necessary to achieve this purpose and based on the legitimate interest of the Data Controller following an appropriate balancing with the rights and fundamental freedoms of the data subjects.	<p>Pursuit of our legitimate interest or that of third parties (Article 6(1)(f) GDPR).</p> <p>The provision of personal data is necessary for this purpose. You may object to the processing carried out for this purpose at any time.</p>	The only information necessary to ensure compliance with this purpose.

3. Processing Methods

The processing will be carried out in accordance with the provisions of Chapter II (Principles) and Chapter IV (Controller and Processor) of the GDPR. In particular, the data will be processed lawfully, fairly, and transparently in relation to the data subject, collected for specific, explicit, and legitimate purposes, as well as adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed.

The processing of data is carried out using electronic tools with appropriate measures to ensure the security and confidentiality of the data, aimed at preventing unauthorized access, loss, or destruction of information.

4. Retention period for personal data

Your personal data will be kept for a period not exceeding that strictly necessary to achieve the purposes for which it is collected, as well as for any longer period necessary to comply with legal obligations and/or for the purposes of judicial protection, and in any case not beyond the ordinary statutory limitation periods.

At the end of the retention period, your personal data will be deleted or made anonymous.

5. Scope of personal data communications

Your data may be made accessible, for the purposes mentioned above, to the following parties:

- staff of the Data Controller authorized to process under Article 29 of the GDPR;
- independent authorities, law enforcement agencies and/or judicial and administrative authorities for their institutional purposes within the limits established by law.
- third parties, such as companies within the Group of which the Data Controller is a part and/or third parties that perform outsourcing activities on behalf of the Data Controller, who will process the data as Data Processors pursuant to Article 28 of the GDPR, duly appointed through a dedicated appointment act, indicating the processing methods and the security measures they must adopt for the management and storage of the personal data for which the Company is the Data Controller.
- third parties involved in an extraordinary corporate transaction, such as, for example, a merger or the sale of a business unit, including those who provide them with advice in connection with the transaction.

The complete list of subjects to whom your personal data has been or may be communicated is available to you upon request via email at privacy@oqema.it.

6. Transfer to Third Countries outside the EU

The Company retains your personal data on servers located within the European Union. However, in the event that the Company needs to transfer personal data to third countries outside the EU, for reasons strictly related to the performance of your job duties, the Company commits to carrying out such transfers in compliance with the provisions of CHAPTER V (Transfers of data to third countries or international organizations) of the GDPR: in particular, based on an adequacy decision by the European Commission or based on adequate safeguards pursuant to Articles 46 and following of the GDPR.

7. Exercise of the rights of data subjects

The subjects to whom the personal data refers can exercise their rights under Articles 15 to 22 of the GDPR at any time.

In particular:

- The data subject has the right to obtain from the data controller confirmation of whether or not there are ongoing processing activities concerning their personal data, and in this case, access to the following information: the purposes of the processing, categories of personal data being processed, recipients or categories of recipients to whom the personal data has been or will be disclosed, particularly if recipients are in third countries or international organizations; the retention period for the personal data or, if not possible, the criteria used to determine that period. If the data is not collected from the data subject, all available information regarding its source. The existence of automated decision-making processes and, in such cases, meaningful information about the logic involved, as well as the significance and expected consequences of such processing for the data subject; The existence of adequate safeguards under Article 46 related to the transfer to third countries or international organizations.
- In addition, the Data Subject has the right to: obtain the update, correction, or integration of their data, deletion, within the limits permitted by law, or request that it be anonymized, restriction of processing, and has the right to object, in whole or in part, for legitimate reasons, to the processing of personal data concerning them;
- To obtain the portability of data processed electronically, provided based on consent or contract;
- To revoke their consent, where applicable, without affecting the lawfulness of processing based on consent before the revocation;
- To file a complaint with a Supervisory Authority. The competent authority in Italy is the Authority for the protection of personal data ("Garante"). More information on how to submit complaints is available on the Garante's website, at the following address <http://www.garanteprivacy.it>;
- To file an appeal with a judicial authority.

The interested party may at any time contact the Data Controller to exercise the aforementioned rights using the contact details provided in point 1 of this notice.

The interested party may also contact the following address privacy@ogema.it to report any violations of the rules on the processing of personal data as well as to make use of the data breach service under the authority and the direct control of OQEMA.

The Company will respond to your requests - in writing in paper format or electronic format - no later than one month from the receipt of the same, or within 3 months in cases of particular complexity.

If the Data Controller does not comply with your request, we will provide you with feedback regarding the reasons for non-compliance, without prejudice to your right to lodge a complaint with a supervisory authority or to seek judicial review within one month of receiving the request.

8. Changes to this policy

Should this document undergo any substantial changes, the Owner commits to informing you through a specific communication prior to the actual entry into force.