

## **Privacy Policy & Cookie Policy - information about the processing of personal data**

According to Article 13 of the Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data (hereafter also called "GDPR" or "Regulation"), the controller informs herewith about the processing of personal data carried out through the website [www.griven.com](http://www.griven.com) (hereafter also called "this website"). According to the Regulation, the processing of personal data will be based on principles of fairness, lawfulness, and transparency.

This privacy policy applies to this website only, and not to other websites that may be accessed by the user through links available on this website. We therefore invite the user to refer to the information provided by these websites regarding their own privacy policy.

### **Data controller**

The company Griven Srl is the controller responsible for the processing of the personal data collected and obtained from this website. It determines how the data will be stored and who will be able to process the information collected from this website. The contact details of the company can be found at the end of this document.

### **Nature of the processed data and processing purposes**

#### ***Technical data***

The computer systems and software procedures used to operate this website gather, during their normal operation, some data whose transmission is strictly related to communication protocols. This category of data includes: IP addresses, browser version, operating system, domain name, websites originating the access, information on the visited pages, access time, routing, other data related to operating system and to the user's computer environment. This information is processed by the hosting service provider for technical purposes about service management and could also be used to ascertain responsibility in case of computer crimes against the website. Collected information will only be accessible to the controller in an aggregate and non-identifying manner and will be used for technical management of services and anonymous statistics on generated traffic and visited pages. It will be stored for the time necessary to fulfill the specified purposes.

#### ***Data provided by users via e-mail***

The site shows the company e-mail address that everyone can freely use to send messages. Collected information will be processed for the purposes specified by the data subject and will be stored in compliance with the principles of lawfulness, purpose limitation and data minimization, pursuant to art. 5 of the GDPR, for the time required to achieve the purposes of collection.

#### ***Newsletter Subscription***

Users can subscribe to our Newsletter by filling up the registration form reported on our homepage. Upon prior consent, requested information will be used for the following purpose:

- Mailing of our Newsletter containing information and updates about products and services.

Collected information will be stored in compliance with the principles of lawfulness, purpose limitation, and data minimization until expiration. Users can unsubscribe at any time from the Newsletter, using the link at the bottom of it.

## **Cookies**

Cookies are short, small string files that are saved on the user's device when browsing the website and are used by the website to improve and customize the navigation.

Our system uses session cookies, which are stored in temporary memory and are not retained after the browser is closed, as well as permanent cookies, which are stored on a user's hard drive until they expire or until the user deletes them. Cookies cannot access nor read other files stored in the device's memory and cannot be used as malware. There are other technologies such as pixel tags, web bugs, web storage, and other similar files and technologies that can perform the same functions as cookies. In this Cookie Policy, the term "cookie" also refers to all these similar technologies.

### ***Technical or functional cookies***

Technical or functional cookies are stored directly by our domain and are used to save the user's consent or to manage specific service delivery functions according to the user's choices. These cookies do not require user's consent.

### ***Analytical cookies***

We do not use third-party analytical cookies.

### ***Third-party cookies and Social Media contents***

This website uses third-party services that place technical and marketing cookies, about which we inform visitors through the Cookie Banner on our homepage.

On this site you can find links to our Social Media, such as Facebook, YouTube, Twitter, Instagram, LinkedIn, linking to videos or other multimedia contents.

By using these links, the user interacts with web services offered by third-party websites, generating data transmission to those sites, whose information management and delete procedures are regulated by each third party.

For instance, when you access our social media profiles such as Facebook, YouTube, Twitter, Instagram, LinkedIn through links on this site, your browser or the app will establish a direct link to third-party websites ("Social Plug-in"), sending information directly to third-party domains, owners of the cookies. We inform hereby that we have no influence at all on the scope of data collected and processed by third-parties. Therefore, for your data protection, you must refer to the "privacy policy" and "cookie policy" of the third-party website, which collects this information. The visitor is therefore invited to further check purpose and scope of data collection, exercise of personal rights, and setting options to protect his/her privacy using the guidelines provided by the relevant third party.

### ***Links to other websites***

On our website you can find links to the official pages of our sister companies of the Nordeon Group, as well as to Google Maps. These links lead the user to interact with the web services offered by third-party sites and imply the exchange of information with such sites. The visitor is therefore invited to further check purpose and scope of data collection, exercise of personal rights, and setting options to protect his/her privacy using the guidelines provided by the relevant third party.

### ***Consent to cookies - acceptance of cookies***

When entering our website, a cookie banner displays a link to this extended information. By closing the banner and/or browsing the site, the visitor gives consent to cookies, including third-party cookies. The consent is stored with a "technical cookie" in the user's device.

Cookies can be managed as explained in the following examples:

- using browser settings to allow or prevent cookies and third-party cookies. Some settings can also block selected third-party cookies;
  - adding specific software components to the browser (the so-called plug-ins), which specialize the functions commonly delivered by softwares for the navigation and can be set by the user to select cookies according to their domain;
- using "do not track" option, which informs each site visited that users do not want to be tracked during the navigation. However, as this functionality is not standard yet, there is no guarantee that it is implemented on all domains storing cookies on websites;
- disabling Google Analytics cookies by visiting the Google web page (Google GaOptOut) and downloading the add-on related to the browser used.

Note: if you choose to block cookies, the functionality of the website could be compromised.

### ***Processing and storage***

Personal data are processed with electronic/IT tools only by authorized personnel, trained by the controller or by competent third parties, in compliance with the principles of lawfulness of the Regulation and through the adoption of appropriate security measures to limit the access to collected information only to authorized parties.

Data will be stored for the time required by the processing purposes, as specified in the previous sections where storage times are detailed for each **proceeding**.

### ***Data communication***

Personal data are accessible only to authorized parties, responsible for the proper management of our activities through this website:

- internal staff acting under the authority of the controller;
- third parties such as professionals, consultants, or companies in charge of services related to the organization and management of our activities or to the management of this website.

### ***Data disclosure and transfer***

The collected data will not be disclosed in any way and will not be transferred outside of Europe.

### ***Right of access by the data subject***

Except for the limitations established by the Regulation, data subject may, at any time, exercise the following rights reported in articles 15 to 22 of the GDPR:

- access to personal data; amendment; cancellation; usage limitation; data processing opposition; data portability;
- withdrawal of consent, where provided, whereas the withdrawal of consent does not affect the lawfulness of the data processing based on the consent granted before the withdrawal;

- information on the automated process related to profiling.

The data subject must contact the controller at the address:

GRIVEN Srl - Via Bulgaria 16, 46042 Castel Goffredo (MN) Italy – E-mail: [sales@griven.com](mailto:sales@griven.com).

The data subject has the right to lodge a complaint with a Supervisory Authority, according to the terms and conditions of the Regulation. Please visit [www.garanteprivacy.it](http://www.garanteprivacy.it) or any other website of a Supervisory Authority in EU countries for further information.