

## PRIVACY POLICY PURSUANT TO ART. 13 EUROPEAN REGULATION 2016/679

Protecting the security and confidentiality of your personal data is important for our company ELCOM SRL with sole shareholder (P. VAT 04282810987) based in Via Ugo la Malfa, 5 - 25030 Castel Mella (BS).

We hope that the information below will help you to understand what data we usually collect through the [www.elcomledcomponents.com](http://www.elcomledcomponents.com) website, for what purposes we treat them, how we safeguard them and with whom we share them.

Pursuant to art. 13 of the European Regulation 2016/679 (GDPR) we also wish to inform you that the processing of your personal data will be based on the principles of fairness, lawfulness and transparency, protecting your privacy and your rights and in compliance with current legislation on security and protection of personal data.

In particular, we inform you of the following:

### a. NAVIGATION DATA

The computer systems and computer programs used for the operation of the Site collect certain personal data whose transmission is implicit in the use of Internet communication protocols (e.g. IP addresses or domain names of computers used by users connecting to the Site, the URI -Uniform Resource Identifier- addresses of the requested resources, time of the request, method used in submitting the request to the server, file size obtained in response, numeric code about the state of the response rendered by the server -good end, error, etc.- and other parameters related to the operating system and the computer environment of the user). Although this information is not collected in order to be associated with identified data subjects, its nature may, through processing and association with data held by third parties, allow users to be identified.

These data are used only for the purpose of obtaining statistical information not associated with any user identification data on the use of the site and to check its correct functioning and are deleted immediately after processing. The data may be used to ascertain liability in case of hypothetical computer crimes against the Site.

### b. SOURCE OF PERSONAL DATA

Please note that the processing of personal data means any operation or set of operations, performed with or without the aid of automated processes and applied to personal data or sets of personal data, such as the collection, registration, organisation, structuring, preservation, adaptation or modification, extraction, consultation, use, communication by transmission, dissemination or any other form of making available, comparison or interconnection, limitation, cancellation or destruction.

The personal data that we collect through the Site are essentially inherent in

- Identification data (name and surname), contact data (email address), relating to the professional qualification or private subject of the user as well as city - optional field- and state (data required in order to give the User's requests a relevant, adequate and correct response also from a technical and commercial point of view), any other data provided by you in the free fields. The data collected are those provided by you when submitting a request for information on our products/ services, by filling in the appropriate forms on the Site;
- Identification (name) and contact data (email address) provided by you at the time of your request to subscribe to our Newsletter service, by filling in the appropriate forms on the Site.

All personal data will be processed in compliance with the European Regulation 2016/679 and the confidentiality obligations that have always inspired the activity of the Data Controller.

Please do not provide through the forms on the Site and/ or in any other communication addressed to Ivela particular categories of personal data, that is, data from which they may infer, inter alia, racial or ethnic origin, religious beliefs, political opinions, membership of parties, trade unions, associations and organisations of a religious, philosophical, political or trade union nature, information on health status or sexual orientation. In any case, any special data will be deleted immediately.

In relation to the personal data collected through the use of Cookies, please refer to the Website Cookie Policy.

#### c. LEGAL BASIS AND PURPOSE OF PROCESSING

We process your data for the following purposes:

##### c.1) Purposes of handling your requests

By processing the data provided by you, we will be able to respond to your requests for information, technical-commercial-design support or your request to be contacted.

The legal basis for the processing described here is the implementation of pre-contractual measures taken at your request.

#### d. METHODS OF PROCESSING

The data will be processed manually and/or electronically, in order to guarantee, in relation to the purposes for which they were communicated and collected, security, as well as to prevent unauthorized access by third parties and, in any case, in compliance with the provisions of national and European legislation.

#### e. NATURE OF THE TRANSFER AND CONSEQUENCES OF THE REFUSAL

The provision of data in relation to the purpose referred to in point c.1) is necessary to be able to verify your requests; in case of failure to provide the consequences of your refusal will be those of not being able to receive a response to requests made by you while it will not be in any way prejudiced or limited the possibility of browsing the Site.

#### f. DATA RETENTION PERIOD

The data you provide will be stored in relation to:

– the purpose c.1) for the time necessary to process your request for information or contact and subsequently for a period of 12 months. Any further storage of your data may take place as a result of the establishment of a contractual relationship between the parties and the processing will be regulated there;

#### g. SUBJECTS OF DATA PROCESSING AND COMMUNICATION

Your personal data may come to the attention of the employees and/or collaborators of the Data Controller in charge of carrying out for the same activity necessary in order to achieve the purposes of the processing referred to in paragraphs c.1), c.2) above.

These subjects, formally appointed by the Data Controller as designated subjects for processing, Data Processors, will process your data in compliance with and exclusively for the purposes indicated in this information and on the basis of the instructions provided by the Data Controller.

Your data may also be disclosed to third-party suppliers, such as freight forwarders and/or agents and/or distributors, who will process them, as Data Processors appointed by the Data Controller or, depending on the case, as autonomous Data Controllers formally appointed by the Data Controller

as subjects designated for handling, exclusively for the purpose of shipping products and/or promotional samples and/or in order to be able to contact you to verify the requests you have made.

The complete and updated list of subjects to whom your data have been communicated can be requested from the Data Controller, to whom you can contact by writing to the e-mail address indicated in point l.

#### h. DISSEMINATION OF DATA

Personal data will not be subject to disclosure except in aggregate, anonymous and not intelligible. No data will be subject to any fully automated decision-making process, including profiling.

#### i. DATA TRANSFER ABROAD

Any transfer of data outside the EU/EEA territory will take place in compliance with the principles and conditions laid down by law.

#### l. RIGHTS OF THE DATA SUBJECT

According to the applicable data protection legislation, the Data Subject may exercise the following rights in relation to the processing of personal data:

- i. obtain confirmation as to whether or not data concerning him exist;
  - ii. obtaining access to the data;
  - iii. have information on the content and origin of the data, the logic applied in the case of processing carried out with the help of electronic tools, the purpose on which the processing is based, the categories of personal and particular data concerned, the recipients or categories of recipients to whom the personal and sensitive/particular data have been or will be communicated, the retention period or the criteria used to determine the period, the identification details of the holder, the responsible persons, the designated persons and the DPO where designated;
  - iv. obtain the limitation of the processing, the portability of the data, the cancellation, the transformation in anonymous form or the block of data processed in violation of the Law, the updating, the correction and the integration of the data themselves;
  - v. object to the processing of such data;
- there. revoke their consent, if given, without prejudice to the lawfulness of the processing carried out up to that moment based on the consent given before the revocation;
- vii. lodge a complaint with the Supervisory Authority (Data Protection Authority);

If you wish to exercise your rights, you can contact ELCOM SRL with sole shareholder, with registered office in Via Ugo la Malfa, 5 - 25030 Castel Mella (BS) e-mail address via Ugo la Malfa, 5 - 25030 Castel Mella (BS).

#### m. CHANGES TO OUR PRIVACY POLICY

The Site's Privacy Policy was last updated on 20 March 2023.

The Data Controller reserves the right to make changes to this policy at any time and without notice. We recommend all users and visitors of this site to revisit this page occasionally in order to learn any changes or be aware of entering new information. In any case, the personal data will not be processed for purposes other than those indicated in

the information in force at the time of the provision of data and in relation to which the user/ visitor has possibly expressed his consent.