

Eelectron S.P.A., with registered office in Via Monteverdi 4, Legnano (MI) 20025 (hereinafter referred to as the “**Controller**”) is constantly committed to protecting the on-line privacy of its users. This document was drawn up in compliance with art. 13 of EU Regulation 2016/679 (hereinafter referred to as: “**Regulation**”) in order to allow you to be aware of our privacy policy, to understand how your personal information is handled when you use the site <https://www.eelectron.com/it/> (hereinafter referred to as the “**Site**”) and, if necessary, to give express and informed consent to the processing of your personal data.

The Company acts as Data Controller in compliance with Article 4 (7) of the Regulation with reference to user data and navigation data.

According to the rules of the Regulation, the processing carried out by the Data Controller will be based on the principles of lawfulness, correctness, transparency, purpose and storage limitation, data minimisation, accuracy, integrity and confidentiality.

1. What is personal data? What data do we process?

“Personal Data” means any information suitable for identifying, directly or indirectly, a natural person, in this case You, who are browsing the Site.

In particular, the Personal Data processed through the Site are:

a. Navigation data

The computer systems and software procedures used to operate the Site acquire, during their normal operation, some Personal Data whose transmission is implicit for the use of Internet communication protocols. This is information that is 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 to be identified. This category of data includes IP addresses or domain names of the computers used by users who connect to the Site, the addresses in the URI (Uniform Resource Identifier) notation of the requested resources, time of the request, method used to submit the request to the server, the size of the file obtained in response, numerical code indicating the status of the response given by the server (success, error, etc.) and other parameters relating to the operating system and the user's computer environment. These data are used for the sole purpose of obtaining anonymous statistical information on the use of the Site and to check its correct functioning, to identify anomalies and/or abuses, and are deleted immediately after processing. Such data may be used to ascertain responsibility in the event of hypothetical computer crimes against the site or third parties.

b. Data voluntarily provided by you on the Site to use our services

Eelectron directly collects your data (e.g. personal and identification data, contact data) in order to satisfy the requests You have made. In this regard, on the Site different forms can be found, which must be filled in by the user, in order to be able to manage and follow up on the requests made by the same.

c. Special categories of personal data

When using the “Work with us” section of the Site, which includes the subsection for sending unsolicited applications, there may be a transfer of your Personal Data falling within the category of special categories of Personal Data referred to in art. 9 of the Regulations, defined as “[...] data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data

concerning a natural person's sex life or sexual orientation". We invite you not to publish such data unless strictly necessary. Indeed, we remind you that if such special categories of Personal Data are transmitted, but there is no specific consent to process such data (which obviously still allows you to send a curriculum vitae), Eelectron cannot be held responsible in any way, nor will it receive disputes of any kind, because in this case processing will in any case be allowed as it relates to data manifestly made public by the data subject, in compliance with art. 9(1)(e) of the Regulation. However, we specify the importance, as already indicated above - of giving your explicit consent to the processing of the special categories of Personal Data, should you decide to share such information.

We also inform you that, for recruitment purposes, Eelectron may analyse your professional social profiles made freely available on the Internet (e.g. LinkedIn).

d. Cookies.

We also collect your data through cookies. Cookies are small data files that are stored on your computer when you access a site or parts of it. Cookies allow the Controller to ensure the operation of the Site and to collect statistical and anonymous information on its use. It is possible to refuse to receive cookies by selecting the appropriate setting on your browser, but this may prevent the full use of the Site's features. For more information on the use of cookies by the Controller, please refer to our cookie policy.

2. Purpose, legal basis and explanation

Below we indicate the purposes for which we will use your personal data as Data Controller, the legal basis in compliance with Article 6 of the Regulation and a brief explanation of each purpose.

| | | |
|---|---|---|
| a) Access to services provided by Eelectron | Performance of the contract and/or pre-contractual measures | We will process your personal data as part of the contractual relationship established and/or under establishment. |
| b) Contact | Performance of pre-contractual measures | We will process your personal data if you have requested information using the form in the "Contacts". |
| c) Storage of accounting records | Legal obligation | We will process your personal data to fulfil any legal, accounting and tax obligations. |
| d) Newsletters, communications with promotional content | Legal obligation and legitimate interest | We will process your personal data for sending the newsletter and for sending - by automated means (e-mail, SMS) - communications with promotional, information and/or advertising content in relation to Eelectron products or services. |
| e) Recruiting | Performance of pre-contractual measures | Your personal data will be processed to analyse your CV and, where relevant, to contact you again if you sent your application through the "Work With Us" section. |
| f) Detecting or preventing fraudulent activities | Legal obligation | |

g) Compliance with orders from judicial authorities or other public authorities Legal obligation

3. What happens if you decide not to provide us with your data?

The provision of your personal data for purposes a) and b) is optional. However, in the absence of data it will not be possible to provide you with our services.

The provision of your personal data for purposes c), f) and g) is mandatory as it is necessary to comply with legal obligations.

The provision of your personal data for purpose d) is optional. Failure to provide consent does not prevent you from using our services.

The provision of Personal Data for purpose e) is optional but failure to provide it would make it impossible to evaluate your CV.

4. Who we communicate your data to

Your Personal Data may be shared, for the purposes referred to in section 2 above, with:

- persons, companies or professional practices providing assistance and consultancy in accounting, administrative, legal, tax, financial and credit recovery matters relating to the provision of the Services;
- subjects with whom it is necessary to interact for the provision of the Services (for example, hosting providers and banking institutions) or subjects delegated to perform technical maintenance activities (including maintenance of network equipment and electronic communication networks);
- subjects, bodies or authorities to whom it is mandatory to communicate your personal data by virtue of legal provisions or orders of the authorities;
- persons authorised by the Data Controller to process Personal Data necessary to carry out activities strictly related to the provision of the Services, who are committed to confidentiality or have an adequate legal obligation of confidentiality (e.g. employees and collaborators of the Data Controller).

5. Redirect to external sites

The Site/App uses the so-called Social plug-ins, which are tools that allow to incorporate social network features directly into a website.

Each of the social plug-ins present on the Site is identified by the logo owned by the platform. If the user interacts with the plug-ins, the information related to the data subject is directly communicated to the social network that processes your Personal Data as an independent Data Controller, therefore, in order to obtain more details about the purposes and methods of processing, exercisable rights and storage of personal data, please refer to the privacy policy of the social network.

The reference social networks present on the Site are:

- Twitter button and social widgets (Twitter) provided by Twitter Inc.
Personal data collected: Cookies and Usage Data.
Place of processing: USA, Privacy policy available at <https://twitter.com/privacy?lang=it>
- Facebook button and social widgets (Facebook, Inc.) provided by Facebook, Inc.
Personal data collected: Cookies and Usage Data.
Place of processing: USA – Privacy Policy available at <https://www.facebook.com/privacy/explanation>
- LinkedIn button and social widgets (LinkedIn Corporate) provided by LinkedIn Corporate.
Personal data collected: Cookies and Usage Data.

Place of processing: USA - Privacy policy available at <https://www.linkedin.com/legal/privacy-policy>

- Youtube Video button and widget (Google Inc.).
Personal data collected: Cookies and Usage Data.
Place of processing: USA - Privacy policy available at <https://policies.google.com/privacy?hl=it&gl=it>

6. Transfer to third countries

Your personal data will not be shared with subjects outside the European Economic Area; in the event that this should happen, we ensure that this occurs in compliance with Regulation 679/2016, adopting precautions which envisage transfer only to countries subject to an adequacy decision, on standard contractual clauses approved by the European Commission, on consent or on another suitable legal basis.

7. Data storage

Personal data will be stored only for the needs related to each of the purposes referred to in paragraph 2 and in compliance with the principle of minimisation.

We may need your data to defend your or our rights (articles 2946 et seq. of the Italian Civil Code), as well as to comply with the obligations to maintain accounting records. Therefore, we keep this data for as long as necessary and in any case no longer than 10 years. We also keep your data whenever required by law or by an order from public authorities.

More information about the data storage period and the criteria used to determine these periods can be obtained by writing:

- a registered letter with return receipt to Eelectron - Via Claudio Monteverdi 6, 20025 Legnano (MI) Italy;
- an e-mail to info@eelectron.com

8. Your rights

You have the right to access the data concerning you at any time, in compliance with art. 15-22 GDPR. In particular, you can request access (Article 15 of the Regulation), correction (Article 16 of the Regulation), deletion (Article 17 of the Regulation), limitation of the processing of the data in the cases envisaged by art. 18 of the Regulation, the portability of data concerning yourself in the cases envisaged by art. 20 of the Regulation, as well as to lodge a complaint with the competent supervisory authority (Guarantor for the Protection of Personal Data). You also have the right to withdraw your consent at any time, in compliance with Article 7 of the Regulation; it is specified that the withdrawal of consent does not in any case affect the lawfulness of the treatment based on the consent prior to the withdrawal.

You can make a request to object to the processing of your data in compliance with art. 21 of the Regulation, in which you highlight the reasons justifying such objection: The Data Controller reserves the right to evaluate your request, which will not be accepted in the event of the existence of compelling legitimate reasons to proceed with the processing that prevail over your interests, rights and freedoms.

9. How to exercise your rights or request information regarding the privacy policy

For any information and needs, as well as for the exercise of the aforementioned rights, we are at your disposal at the e-mail address info@eelectron.com.

10. Changes

The latest version of this privacy policy was updated on 12/06/2019. The Controller reserves the right to modify or simply update its content, in part or completely, also due to changes in the applicable legislation. The Controller will inform you of these changes and they will be binding as soon as they are published on the Site. The Controller therefore invites you to visit this section regularly to become aware of the most recent and updated version of the privacy policy, in order to always be updated on the data collected and on the use made of it.