

PRIVACY POLICY STATEMENT ON WEBSITE
pursuant to art. 13 GDPR, Regulation (EU) 2016/679
(Ref. PRV2021070601R1-EN)

LATI Industria Termoplastici S.p.A. (hereinafter, LATI) herewith informs you about the purpose and method for the processing of your personal data and about your rights according to the Regulation of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data ("GDPR").

1. Types of data

The data referred to in this privacy policy statement is the personal data collected automatically while browsing the website www.lati.com or provided personally by the Data Subjects.

We inform you that "personal data" is "any information concerning natural persons (Data Subjects) that are or can be identified also by way of other items of information – e.g., via a number or an ID code. For instance, personal data is one's first or last name, address, Tax ID as well as a picture, the recording of one's voice or one's fingerprint, or medical, accounting or financial information relating to that person".

The data collected can be grouped into the following categories:

A) "Common" personal data

The site collects data provided voluntarily by the visitor such as, depending on the situation, the personal information and contact details (name, family name, address, telephone number, date of birth, e-mail address ...) necessary to accept applications for participation in events and promotional initiatives organised by the Data Controller.

The website also allows visitors to submit their CVs for personnel recruitment purposes.

Pursuant to Chapter I art. 9 GDPR ("special categories of personal data") the processing will not include sensitive data.

The candidate, therefore, will not be required to provide data pertaining to "special categories", according to art. 9 GDPR or "sensitive data" revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of 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. This data, if any, contained in the CV or in other documents sent to us (including data revealing, by way of example, one's state of health, or pertaining to protected categories) will be immediately erased.

Users belonging to a protected category are therefore invited to send their CVs only by ordinary mail to the address of the Data Controller, together with the following signed declaration of consent: "Pursuant to art. 9 of Reg. 2016/679, I authorise LATI Industria Termoplastici S.p.A. to process my sensitive data for the purposes specified in the privacy policy statement."

B) Log data

Like all websites, this site also makes use of log files storing information that is collected in an automated manner from visitors and users. The information collected may be the following:

- internet protocol (IP) address;
- type of browser and the parameters of the device used to connect to the website browser and the operating system of the device used for connecting to the site;
- date and time of visits;

- website pages visited;
- visitors referral and exit page.

C) Cookie policy

This site uses cookies, i.e. small text files recorded on the user's device or allowing access to information therein. Cookies are used for storing information on the visitors' preferences, verifying the correct operation of the site and improving its functionality by customising the content of the pages based on the type of browser used, or simplifying browsing by automating the procedures (e.g. login, site language) and finally analysing the use of the site by visitors.

This site makes use of the following types of cookie:

- **Technical cookies**, used for the sole purpose of ensuring the correct display of the site and browsing. Some of these cookies are deleted when the browser is closed (session cookies), others have a longer duration. These cookies do not require consent.
- **Analysis cookies**, used for analysing the use of the site by visitors, drawing reports on activities, users' behavior, checking how often users visit it, how the site is tracked and which pages are visited most frequently. In particular, this site uses third-party cookies (**Google Analytics**). The types of data collected are: browser identifier, date and time of interaction with the site, referral page, IP address. The data collected does not allow the personal identification of users, and is not crossed with other information relating to the same person. The data is **processed in aggregate and anonymised form** (the last octet is dropped) and as such it is assimilated to technical cookies. According to a special agreement (DPA) Google Inc. (the Data Processor) shall not cross such data with that obtained from other services.

Further information on Google Analytics cookies can be found on the page Google Analytics Cookie Usage on Websites.

The user can selectively **disable** (opt-out) the data collection functions of Google Analytics by installing on his browser a specific component provided by Google (opt out).

By actively clicking **OK on the banner** on the first access to the site or by **browsing the site**, the visitor expressly gives consent to the use of cookies and similar technologies – in particular to storing cookies on his device for the above purposes – or to the access to information stored on his device through the cookies.

Cookie disabling

The user can deny his consent to the use of cookies and revoke his consent at any time. Since cookies are linked to the browser used, they can be disabled directly from the browser, as a result denying / revoking consent to the use of cookies.

IT MUST BE POINTED OUT THAT DISABLING COOKIES MAY IMPEDE THE CORRECT USE OF CERTAIN FUNCTIONS OF THE WEBSITE, in particular, the services provided by third parties, such as Google maps, may not be accessible.

Instructions for disabling cookie are to be found on the following web pages:

Mozilla Firefox - Microsoft Internet Explorer - Microsoft Edge - Google Chrome - Opera - Apple Safari

2. Legal basis for the processing

The legal basis for the processing is the legitimate interest of the Data Controller to promote commercial relations with company contacts, as well as the consent of the Data Subject.

3. Data processing purpose

The navigation data is processed in an automated manner and collected in an exclusively aggregated form in order to check the performance of the site, to undertake anonymous statistical surveys on its use as well as for security purposes in order to prevent any damage or illegal conduct.

The personal data collected by the Data Controller – or by third parties designated by the Data Controller for personnel recruitment procedures – is processed and used to answer to the requests of the Data Subjects and, more precisely, to verify the conditions for recruitment and/or the start of a working relationship

The personal data collected in relation to applications for participation in events and promotional initiatives organised by the Data Controller is treated and used exclusively to meet the request of the Data Subject.

The data collected in order to answer questions or to have access to documents will be used for the provision of the requested service or for contacting the applicant in order to gain further insight into the related issues.
All collected data will be never used for user profiling purposes.

The data provided for sending e-mails is intended as voluntarily provided by the user at the time of the request for the delivery of the service and will be used exclusively for the provision of the service requested.

The contact details may be used for marketing purposes related to the promotion and marketing of Lati products and services.

The lawfulness of the processing is based, therefore, on the consent manifestly expressed by the Data Subject.

The Data Controller, if it intends to process personal data for a purpose other than that for which they were collected, will provide the Data Subject with information regarding this different purpose, and any other relevant information, before such further processing.

4. Data processing method

The processing is undertaken using IT and /or telematic means, the organisational methods and logic being strictly related to the above purpose.

5. Data processing location

The navigation data collected from the website is processed at the company hosting the website, in Italy.

The personal data provided voluntarily by the visitor is processed at the Data Controller's head office.

CV data is hosted on the Amazon Web Server infrastructure in the European Union.

6. Mandatory or optional provision of personal data - consequences of denial

The voluntary provision of common personal data related to services that require such data is optional, yet necessary for the delivery of these services. Therefore, the denial to provide this data results in the impossibility of obtaining the desired services.

7. Disclosure of personal data

The data collected through the website will not be disclosed to third parties for any reason, unless it is requested by a judicial authority and only in the cases provided for by law.

In addition to the Data Controller, certain categories of persons involved in the organisation of the site may have access to personal data (administrative, commercial and marketing staff, legal advisors, system administrators) or external entities (such as technical service providers, hosting service providers, IT companies, communication agencies). If necessary, these entities are appointed as Data Processors.

8. Transfer of data abroad

This site does not provide for the sharing of personal data collected outside the European Union.

9. Data storage period

The log files will be stored for 2 weeks.

The data collected in order to assess the conditions for recruitment and/or the start of a working relationship will be stored by the Data Controller for a maximum of two years after their collection unless a working or employment relationship is established.

The personal data collected in relation to applications for participation in events and promotional initiatives organised by the Data Controller will be retained for one month after the conclusion of the event or initiative.

The data provided for the purposes of sending e-mails is considered as provided voluntarily by the user at the time of the request for service and will only be used for the time necessary to deliver the service itself.

10. Rights of the Data Subject

In relation to his personal data, the user may exercise the rights guaranteed under art. 15 GDPR on the protection of personal data processing. The Data Subject has the right to obtain confirmation of the existence of personal data concerning him and its communication in an intelligible form.

The Data Subject also has the right to obtain information on the origin of the data, on the data processing purpose and method, on the Data Controller and its Representative, on the entities to which the data may be disclosed.

The Data Subject has the right to have his personal data rectified, supplemented, updated, as well as to obtain their erasure or transformation into anonymous form.

The Data Subject can request the termination of any communication at any time by contacting the Data Controller through an e-mail message.

11. Data Controller and Data Protection Officer

The Data Controller is LATI Industria Termoplastici S.p.A. registered office: via F. Baracca n. 7, Vedano Olona (VA), Italy. We inform you that the company has appointed a Data Protection Officer pursuant to art. 37 GDPR.

Data Processors

- Google is designated as Data Processor, processing data on the behalf of the Data Controller (Google Analytics).
- Interviewweb S.r.l. is designated as Data Processor, processing data on the behalf of the Data Controller (Curricula vitae).

For any further information, please contact: privacy@it.lati.com.

Vedano Olona, 6 July 2021