

PRIVACY NOTICE FOR THE USERS OF THE WEBSITE

Pursuant to the legislation applicable to protection of personal data ("**Privacy Legislation**"), including EU Regulation 2016/679 ("**GDPR**"), Legislative Decree 196/2003 as amended by Legislative Decree 101/2018 ("**Privacy Code**"), Cantore Fabio *ditta individuale* (hereinafter, "**C.F.**", the "**Company**" or the "**Data Controller**"), as data controller, provides users (hereinafter the "**Users**" or, in the singular, the "**User**") of the website **www.4clean.it** (the "**Website**"), that will process their personal data collected through the Website itself in the modalities and for the purposes described in this privacy notice (the "**Notice**").

This Notice applies solely and exclusively to the Website and not to any other websites owned by third parties that the User may access through links contained in the Website. Should the User access another website, it is recommended that he/she reads the information on the processing of personal data applicable to that website.

The User, by browsing the Website, acknowledges that he/she has read and understood the contents of this Notice.

1. Data Controller



The Data Controller is Cantore Fabio *ditta individuale*, with registered office in Novi Ligure (AL), viale Caduti di Nassiriya no. 57, 15067, fiscal code no. 02197410067, to be contacted at the following e-mail address **fabio@4clean.it** or by phone on **+39 0143 71220**.

2. Processed personal data through the Website



The Company will process exclusively the following types of personal data of Users who browse and interact with the web services of the Website and in particular:

Common Data

- Personal data collected implicitly while a User is browsing the Website**

The computer systems, cookie technology and software procedures that are used to run the Website collect, during their normal functioning, certain data whose transmission is implicit when using the Internet. This kind of information is not acquired for purposes directly linked to identifiable data subjects but could, due to its nature, be processed and aggregated with the data held by third parties, in such a way as to make User identification possible.

This category of data includes, for example, the IP addresses or the domain names of the computers used by the Users who connect to the Website, the pages visited by the Users within the Website, the domain names and addresses of the websites from which the User accessed to the Website (through referrals), the URI (Uniform Resource Identifier) addresses of the resources requested, the time of the request, the method used in submitting the request to the web server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server, and other settings relating to the type of browser (e.g. Internet Explorer, Google Chrome, Firefox), operating system (e.g. Windows) and computer environment of the User.

These data are also collected by means of cookie technology, namely text files and numbers that are installed while browsing a website, in the memory of the device (PC, smartphone or tablet) connected to the Internet through the browser application installed therein. For further details regarding the cookies used on the Website, we invite the Users to read the Cookie Policy available at the following link: <https://www.4clean.it/en/cookies-policy>.

- Identification and contact data**

These data are provided directly by the User to the Company (such as, but not limited to: name, last name, address, phone number, e-mail address, any personal data of the sender contained in e-mail communications or attachments thereto, etc.), following the sending of an e-mail or other communication to the Company's contacts as indicated on the Website or during the registration procedure in the private area of the Website.

3. Purposes and legal basis of the processing and nature of the provision of personal data

Purposes of processing	Legal basis of the processing	Data retention period	Nature of the provision of personal data

<p>a) To enable Users to perform the requested service or activity.</p>	<p>Article 6, par. 1, lett. b), of GDPR:</p> <p>processing necessary for the performance of pre-contractual measures taken at the express request of the Users, through, for example, a request for contact, following an e-mail to the Company or through the 'Contact' form on the Website, in order to obtain information about the goods/services offered by the Data Controller and/or a request for a quotation or samples.</p>	<p>Personal data for this Purpose will be stored and processed for the duration of any pre-contractual measures that may be requested by the User, for a period not exceeding 24 months.</p> <p>At the end of the retention periods, personal data will be deleted, unless there are further legitimate interests of the Company and/or legal obligations that make it necessary, after minimisation, to retain them.</p>	<p>The provision of the personal data provided by the User is necessary both for the performance of the specific contract to which the User is a party, and for the performance of the pre-contractual measures concerning the same and adopted by the Data Controller at the express request of the User in order to facilitate the effective conclusion of the contract.</p> <p>However, failure to provide them may result in the impossibility of receiving the good/service offered by the Company and/or replies to communications sent by the User to the Company.</p>
<p>b) Allowing Users to browse the Website.</p>	<p>Article 6, par. 1, lett. f), of GDPR:</p> <p>legitimate interest of the Data Controller to: (i) informing the User, through the contents of the Website and acquainting him/her with the Company's reality, the activities carried out and the services offered; (ii) improving the quality and structure of the Website, as well as to create new services, functionalities and/or features thereof; (iii) interacting with the User interested in the Company's services, through the contact references published on the Website, through the Website's 'Contact' form, as well as through the Website's reserved area.</p>	<p>Personal data for this Purpose will be stored and processed for the entire duration of the navigation and, after its termination, for whatever reason, for a period not exceeding 24 months.</p> <p>At the end of the retention periods, personal data will be deleted, unless there are further legitimate interests of the Company and/or legal obligations which make it necessary, after minimisation, to retain it. At the end of the retention periods, personal data will be deleted, unless there are further legitimate interests of the Company and/or legal obligations which make it necessary, after minimisation, to retain it.</p>	<p>The provision of personal data implicitly provided by the User occurs automatically by navigating on the Website.</p> <p>Therefore, if the Users do not wish to provide any personal navigation data, please do not visit the Website, do not otherwise use the Website, or do not provide your consent when such an option is offered to you under the Notice.</p> <p>On the other hand, the provision of data directly provided by the User in the context of communications with the Company is optional. However, failure to provide them may result in the impossibility of receiving replies to communications sent by the User to the Company.</p>
<p>c) Carrying out the maintenance and technical assistance necessary to ensure the proper functioning of the Website and related services and functionalities.</p>	<p>Article 6, par. 1, lett. f), of GDPR:</p> <p>legitimate interest of the Data Controller to: (i) preventing the occurrence of fraud or other crimes through the use of the Website; (ii) improving the quality and structure of the Website, as well as creating new services, functionalities and/or features of the Website; (iii) managing and processing statistical surveys (after anonymisation or</p>	<p>Personal data for this Purpose will be stored and processed for the entire duration of the navigation and, after its termination, for whatever reason, for a period not exceeding 24 months.</p> <p>At the end of the retention periods, personal data will be deleted, unless there are further legitimate interests of the Company and/or legal obligations which make it necessary, after minimisation, to retain it.</p>	<p>The provision of personal data implicitly provided by the User occurs automatically by navigating on the Website.</p> <p>Therefore, if the Users do not wish to provide any personal navigation data, please do not visit the Website, do not otherwise use the Website, or do not provide your consent when such an option is offered to you under the Notice.</p> <p>On the other hand, the provision of data directly provided by the User in the context of communications with the Company is optional. However, failure to provide them may result in the impossibility of receiving replies to communications sent by the User to the Company.</p>

	aggregation of data) on the use of the Website, aimed at measuring the functioning of the Website, measuring its traffic and assessing usability and Users' interest.		
d) Fulfil legal, accounting and tax obligations to which the Company is subject.	Article 6, par. 1, lett. c), of GDPR: legal obligation to which the Data Controller is subject.	Personal data collected for this Purpose will be kept only for the time strictly necessary to achieve the Purpose for which they were collected and, in any case, no longer than 10 years after their collection.	
e) Enabling the Company to exercise its rights in court and to suppress unlawful conduct.	Article 6, par 1, lett. f), of GDPR: legitimate interest of the Data Controller to: (i) preventing the occurrence of fraud or other crimes through the use of the Website; (ii) for the management of the Data Controller's or a third party's litigation in court.	At the end of the retention periods, personal data will be deleted, unless there are further legitimate interests of the Company and/or legal obligations that make their retention necessary, after minimisation.	

Where the legal basis of the processing is the legitimate interest of the Data Controller, the Data Controller guarantees that it has previously carried out an assessment ('balancing test') aimed at ensuring the proportionality of the processing so that the rights and freedoms of the Users are not adversely affected, taking into account the Users' reasonable expectations in relation to the specific processing activity carried out.

Users may request **further information on the above evaluation** by sending an e-mail to fabio@4clean.it or by phone on +39 0143 71220.

If the Company intends to use personal data for any other purpose incompatible with the Purposes for which they were originally collected or authorised, the Company will inform the Users in advance and, where required, request his or her consent for such processing activity.

4. Means of the processing



In relation to the mentioned Data Controller's Purposes, the processing of personal data may consist in the activities indicated in Article 4(1)(2) of the GDPR, namely: collection, recording, organization, storage, consultation, processing, disclosure by transmission or otherwise making available, restriction, erasure and destruction of personal data.

Furthermore, the personal data of Users will be:

- processed in accordance with the principles of lawfulness, correctness and transparency;
- collected for the legitimate Purposes determined above;
- adequate, relevant and limited to what is necessary in relation to the Purposes for which they are processed;
- kept in a form which permits the identification of the User for a period of time not exceeding the fulfilment of the Purposes and better defined in Paragraph 3 above;
- processed in such a way as to ensure adequate security against the risk of destruction, loss, modification, disclosure or unauthorised access by means of technical and organisational security measures.

The processing may be carried out using manual, computer and telematics tools, with logic strictly related to the Purposes and, in any case, with means that ensure compliance with the requirements and prescriptions of confidentiality and security, and with the specific obligations provided in the Privacy Legislation, applicable from time to time.

5. Access and communication of personal data



Users' personal data will be processed by the Company's employees and collaborators, specifically designated as authorized persons for the processing pursuant to Article 29 of the GDPR and 2-quaterdecies of the Privacy Legislation, where necessary for the pursuit of the Purposes set out in Paragraph 3 above of this Notice.

The Data Controller informs the Users that their personal data may be communicated for the pursuit of the Purposes to **further recipients or categories of recipients**, in their capacity as autonomous data controllers or, where necessary, data processors specifically selected and appointed pursuant to Article 28 of the GDPR, including but not limited to:

- the Website's technical service providers;
- the hosting providers offering services for hosting the Website.

Users' personal data may also be communicated to third parties in the following cases: (i) when communication is required by applicable laws and regulations with respect to legitimate third party recipients of communications, such as authorities and economic and non-economic public entities that process your data as autonomous data controllers for their respective institutional purposes, health bodies, medical and paramedical personnel, etc; (ii) in the event of extraordinary operations (e.g. mergers, acquisitions, business transfers, etc.).

Furthermore, the Data Controller informs Users that their personal data will not be disseminated.

The complete and updated list of data processors and authorized persons of Users' personal data is kept at the registered office of the Company and can be consulted in the manner set forth in the following Paragraph 8.

The Data Controller informs Users that their **personal data will be disclosed to third parties only after express consent has been given**, except in cases where disclosure is required by law or necessary, or for the pursuit of purposes for which the User's consent is not required by law.

6. Extra UE data transfer



The processing and storage of Users' personal data will take place on servers located within the European Union of the Company and/or third-party companies duly appointed as data processors.

Any transfer of Users' personal data outside the European Union may take place only under the terms and with the guarantees provided for by the Privacy Legislation and, in particular, in accordance with Articles 44 - 49 of the GDPR.

7. Third parties' website



It should be noted as of now that, should the Website contain links referring to websites of third parties, the Company cannot exercise any control over the content of such websites nor does it have any access to the personal data of the users/visitors of such websites. Furthermore, the Company has no access to the personal data of the visitors/users of the websites or to the social network accounts of its Users with whom the Company has contractual relations, but only to aggregate and anonymous data that it may use to evaluate the performance and effectiveness of its services.

The owners of the aforesaid websites will therefore remain the sole and exclusive owners and managers of the processing of their users' personal data, and the Company will remain extraneous to this activity as well as to any liability, prejudice, cost that may arise from its failure or improper performance.

We therefore recommend that you carefully read the relevant privacy policies and terms of use of such websites before providing or consenting to the processing of your personal data.

8. Users' Rights



The User, as data subject, in accordance with the law, will always have the right to withdraw at any time his/her consent, where given, as well as to exercise, at any time, the following rights ("**Rights**"):

- a) the "**right of access**" i.e. the right to obtain confirmation as to whether or not personal data concerning the User are being processed and the communication of such data in an intelligible form;
- b) the "**right to rectification**" i.e. the right to request the rectification or, if interested, the integration of personal data;
- c) the "**right to erasure**" i.e. the right to request the erasure or the anonymization of personal data that have been processed unlawfully, including data whose storage is unnecessary for the Purposes for which they were collected or further processed;

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- d) the **“right to restriction of processing”** i.e. the right to obtain from the Data Controller the limitation of the processing in certain cases provided for under the Privacy Legislation;
 - e) the right to request the Data Controller to indicate the recipients to whom it has notified any rectification or erasure or restriction of processing (carried out in accordance with Articles 16, 17 and 18 GDPR, in fulfillment of the notification obligation unless this proves impossible or involves disproportionate effort);
 - f) the **“right to data portability”** i.e. the right to receive (or transmit directly to another data controller) personal data in a structured, commonly used and machine-readable format;
 - g) the **“right to object”**, i.e. the right to object, in whole or in part:
 - the processing of personal data carried out by the Data Controller for its own legitimate interest;
 - the processing of personal data carried out by the Data Controller for direct marketing or profiling purposes.

In the above cases, where necessary, the Data Controller will inform the third parties to whom the User’s personal data have been disclosed of the his/her exercise of rights, unless it is not possible or is too onerous and, in any case, in accordance with the provisions of the Privacy Legislation.

It is expressly understood, as provided for in Article 21 of the GDPR, that in the event of exercise of the right to object by the User, the Data Controller shall refrain from further processing the personal data unless the Data Controller demonstrates the existence of compelling legitimate grounds for processing that override the interests, rights and freedoms of the User or for the establishment, exercise or defence of legal claims.

The exercise of the aforementioned Rights is not subject to any formal constraint and is free of charge. The Data Controller may, if necessary, ask the User to verify his/her identity before taking any further action following the request to exercise the aforementioned Rights.

The User is entitled to exercise his/her rights at any time in the following manner:

- by e-mail, to the address: **fabio@4clean.it**;
- by phone on: **+39 0143 71220**;
- by sending a registered letter with return receipt to the address of the registered office of the Company: **Novi Ligure (AL), viale Caduti di Nassiriya no. 57, 15067**.

9. Complaint to the Control Authority under Art. 77 of the GDPR



The Data Controller hereby informs the User that, pursuant to the Privacy Legislation, he/she has the right to lodge a complaint with the competent supervisory authority (in particular in the Member State of User’s habitual residence, place of work or place of the alleged breach), if he/she is of the opinion that his/her personal data are being processed in a way that would lead to breaches of the GDPR.

In order to facilitate the exercise of the right to lodge a complaint, the name and contact details of the European Union Supervisory Authority are available at the following link: https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm.

Lastly, should the User wish to lodge a complaint with the Supervisory Authority having competence for the Italian territory (i.e. *“Autorità Garante per la protezione dei dati personali”*), the same can use the complaint form available at the following link: <https://www.garanteprivacy.it/home/docweb/-/docweb-display/docweb/4535524>.

This Notice may be amended and supplemented over time. We invite Users to periodically check its contents. In any event, the Data Controller shall be responsible for duly notifying any significant changes made to this Notice.

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