

## **Website information pursuant to art. 13-14 EU REG. 679/2016 on the protection of personal data**

CHEMI-VIT SRL with registered office in Reggio Emilia Via Don Milani n.5 / c - VAT number 00239700354 and as Data Controller, informs you of the methods of operation and management of the website [www.cliffi.com](http://www.cliffi.com) in relation to the processing of personal data of users who consult it and / or use its services.

The information is provided only for this site and not for other websites that may be consulted by the user via links.

### **Categories and types of personal data processed**

By visiting and / or using this site, various types of data will be collected which may be collected by the site independently or provided voluntarily by the user.

The consultation of the site alone does not require the request for personal data, however technologies are used that involve the acquisition of some data relating to the tools used that can in some way lead back to the user. CHEMI VIT SRL may collect and process the personal data of users when they access and visit the site by browsing the pages, even without registration and without filling in or entering data in online forms.

By way of example but not limited to, personal data may be requested, collected and processed such as:

- Name and Surname
- Address of domicile for the purpose of shipping and billing of orders Order
- details, such as the history of orders processed
- Telephone number Email
- address mail
- The IP address of the device used
- The pages visited by the User
- The time and date in which the user visited the Site

#### ● **Navigation data**

The computer systems and software procedures used to operate this website automatically acquire, in the course of their normal exercise, some personal data whose transmission is implicit in the use of web 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, the MAC addresses, or the domain names of the computers used by users who connect to the site, the addresses in URI (Uniform Resource Identifier) notation of the requested resources, the time of the request, the method used to submit the request to the server, the name of the internet service provider (ISP), the page of origin, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (e.g. error, successful etc.), the system logs and other parameters relating to the user's operating and IT system.

These data are used for the sole purpose of obtaining statistical information both anonymous and with reference to registered users regarding the use of the site, to check its correct functioning and allow its management and maintenance. These data may also be used to prevent or discover fraudulent activities or abuses as well as to ascertain responsibility in the event of hypothetical computer crimes against the site. These treatments find their legal basis in the legitimate interest of the owner (e.g. proper functioning of the site, protection in case of abuse, etc.) and in the fulfillment of legal and / or regulatory obligations (e.g. activation of security systems etc. ...). These data persist on our IT systems for a period not exceeding 24 months, except in the case of liability assessments for IT crimes for which a legal obligation or a request from the Authority may require storage for a longer period.

### **Other data relating to navigation on the site**

#### ***Cookie***

CHEMIVIT-SRL also uses cookies in some areas of the site (eg Google Analytics). For example, cookies allow us to know if the user has already visited the site or allow us to understand which pages of the site are most visited.

For this area of personal data processing, please refer to the Cookie Policy which must be consulted together with the information provided in this statement.

### ***Social buttons and / or widgets***

On the site there are also social buttons / widgets, or specific "buttons" depicting the icons of social networks (for example, Facebook and Twitter) and interactive social walls (eg. Walls that present photos from Instagram via hashtag) that present content from social networks and allow you to incorporate the functions of the latter directly into the website. When you visit a page of our site and interact with the "social buttons / widgets" or decide to leave a comment through the Social platform, the corresponding information is transmitted from the browser directly to the reference social platform and stored there. Apart from these cases, in which the user spontaneously with the click wants to share his navigation data with the selected social networks, CHEMI VIT SRL does not share any navigation information or user data acquired through its site. with social networks. In any case, when the user browses the site, he accepts the terms and conditions of use of the website in addition to the provisions of this Privacy Policy. For information on the purposes, type and methods of collection, processing, use and storage of personal data by the Social Network platform, as well as for the methods by which to exercise your rights, please consult the specific Privacy Policy of the Social Network whose link is also present in our Cookie Policy.

### ***Google Maps***

The site uses the Google Maps plug-in.

This is a service provided by Google LLC ("Google") to include interactive maps within web pages. This service, based on the data subject's account settings, can process personal data of the latter, including the user's geographical location.

To consult the privacy policy of the company Google LLC and to disable the location function of your browser, please refer to our Cookie Policy. where you can find the referral link.

- ***Data provided voluntarily by the user***

The optional, specific and voluntary sending of e-mails to the addresses indicated on this site entails the subsequent acquisition by CHEMI - VIT SRL of the sender's address and any other data that the user enters in the message or present in the documents attached thereto necessary to respond to the request.

This category includes personal data (e.g. name, e-mail address, telephone number, postal address, city, state, company) and any other data that the user freely chooses to communicate to us to submit a request or request a specific service by filling out the form "contact us", "ask the expert", through one of the contacts on the site (eg. e-mail addresses, telephone numbers), using the "chat" function or subscribing to the newsletter service via the 'special form on the site.

Specific summary information may be reported or displayed on the pages of the site set up for particular services on request.

- ***Reserved Area:*** the data entered by the user to register on the site and create the personal account will be used only to: allow user registration, the creation of the personal account and consequently to maintain and manage the account and make use of all services reserved for registered users. Only the data necessary to complete the registration will be requested. The provision of such data is optional but necessary to allow the user to make purchases on the site as well as to allow navigation as a registered user and / or the provision of account management and maintenance services therefore failure to communicate the data will result in the impossibility for the user to use these services. The legal basis that legitimizes these treatments is, depending on the case, the fulfillment of pre-contractual measures requested by the interested party or the fulfillment of a contractual obligation. Except where otherwise provided by the regulations in force, for these activities, the data processing could be carried out without requesting the user's consent as necessary to follow up on the user's registration request. The account will remain active until canceled by the user.

- **Data provided by the user (registered) during the purchase:** The personal data provided by the user or collected at the time of purchase, such as basic personal data, contact information, data regarding purchases, tax data, payment details, information relating to sales and any other data strictly necessary for the delivery of the products, will be used to process, manage and administer orders, purchases, shipments and for after-sales activities (eg returns, refunds), for communications with the user in relation to to order; to fulfill legal or regulatory obligations; to protect the legitimate interests of the company (e.g. to exercise one's rights in court). The provision of such data is optional but necessary as any refusal or partial / incorrect provision would make it impossible to complete the purchase. Except where otherwise provided by the regulations in force, for these activities, the data processing could be carried out without requiring the user's consent as necessary to fulfill contractual and legal obligations. For these purposes, the data will be processed for the time strictly necessary for the fulfillment of the contractual and legal obligations related to the sale (eg in tax matters) and in general no later than 10 years from the time of purchase. If required by specific legislation, the data retention time may be longer.
  
- **Contact form ("contact us now" or "ask the expert"):** the data (name, surname, e-mail address, telephone number, address, city, state, company) requested from the user (registered or guest) and entered by the same in the contact form will be used only for processing the request forwarded. Only the data strictly necessary to allow the management of the request will be requested. The legal basis that legitimizes these treatments is the consent of the interested party and, depending on the case, the fulfillment of pre-contractual measures requested by the user. The provision of data for this processing purpose is optional. However, failure, partial or incorrect provision of data may make it impossible to manage and follow up on user requests. Except where otherwise provided by the regulations in force for these activities, the data processing could be carried out without requiring the user's consent as they are necessary to follow up on a request made by the user. The data will be processed for the time strictly necessary for the processing purposes (eg to process the request).
  
- **E-mail and telephone numbers:** the data received through the use by the user (registered or guest) of the contacts on the website are used exclusively to respond to the User's requests. The legal basis that legitimizes these treatments is the consent of the interested party and, depending on the case, the fulfillment of pre-contractual measures requested by the user. The provision of data for this processing purpose is optional. However, failure, partial or incorrect provision of data may make it impossible to manage and follow up on user requests. Except where otherwise provided by the regulations in force for these activities, the data processing could be carried out without requiring the user's consent as it is necessary to follow up on a request made by the user. The data will be processed for the time strictly necessary for the processing purposes (eg to process the request). Individual contacts can be included in the Mailing List or other specific lists for commercial purposes only with the express consent of the user who wishes to regularly receive certain documents / information (eg news, quotes, commercial information, etc.). The legal basis that legitimizes these treatments is represented by your consent.
  
- **Chat:** the data provided by the user in conversations carried out through the chat on the site or otherwise acquired by the same will be processed to provide feedback to the user's requests. The legal basis that legitimizes these treatments is the consent of the interested party who freely chooses to use this system and, depending on the case, the fulfillment of pre-contractual or contractual measures requested by the user. Except where otherwise provided by the regulations in force, for these activities, the data processing could be carried out without requiring the user's consent as it is necessary to follow up on a request made by the user. The data will be processed for the time strictly necessary for the processing purposes (eg to process the request). Conversations will not be kept for more than 30 days. Individual contacts can be included in the Mailing List or other specific lists for commercial purposes only with the express consent of the user who wishes to regularly receive certain documents / information (eg news, quotes, commercial information, etc.). For information on the functioning of the chat and the related privacy policy, please refer to the provisions of the supplier itself: <https://www.tawk.to/legal/>
  
- **Newsletter Service:** the e-mail address entered by the user in the newsletter subscription form will be used exclusively for the activation of this service. The legal basis that legitimizes this treatment is the

consent of the interested party. The consent can be revoked at any time. The provision of data for this processing purpose is optional. However, failure, partial or incorrect provision of data may make it impossible for the Data Controller to subscribe the data subject to the newsletter service and for the data subject to receive the information and commercial communications of the Data Controller. The data will be processed until the consent is revoked by the interested party (opt-out) in order to allow the latter to express his desire not to be contacted in the future. In the event that the user has already acquired an e-mail address, the company may also use it, without his prior consent, for sending commercial communications (soft-spam) for the purpose of direct sales and / or the promotion of our products similar to those you have already purchased, provided that you do not object to such use by sending an email to [privacy@chemivit.com](mailto:privacy@chemivit.com) or by clicking on the appropriate link to object to receiving communications considered unwanted, made available in the promotional emails sent by CHEMI VIT - SRL. The legal basis that legitimizes this treatment is represented by the legitimate interest of the Data Controller. For the purpose of soft-spam, the Data Controller will process the user's data until the right to object is exercised and, in any case, no later than 2 years from collection. Before the expiry of this term, the owner reserves the right to ask the user to renew the consent and / or update the data.

- **Marketing** Only with your consent, your data (in particular the e-mail address) may be used for marketing purposes (eg sending informative and commercial newsletters). The consent can be revoked at any time. In the event that the (registered) user has already acquired the e-mail address, the company may also use it, without his prior consent, for sending commercial communications (soft-spam) for the purpose of selling, direct and / or the promotion of our products similar to those you have already purchased, provided that you do not object to such use by sending an email to [privacy@chemivit.com](mailto:privacy@chemivit.com) or by clicking on the appropriate link to object to receiving communications considered unwanted, made available in the promotional emails sent by CHEMI VIT - SRL. The legal basis that legitimizes this treatment is represented by the legitimate interest of the Data Controller. For the purpose of soft-spam, the Data Controller will process the user's data until the right to object is exercised and, in any case, no later than 2 years from collection. For information on the functioning of the newslettering system and the related privacy policy, please refer to the provisions of the supplier <https://mailchimp.com/legal/>

- ***Profiling and other commercial treatments***

CHEMI-VIT SRL will process user data, subject to specific and explicit consent, for the analysis of preferences, habits, behaviors and interests derived, for example, from online clicks on articles / sections of the Site and / or the data that the user releases to use the individual services.

Profiling involves processing of the data that the user releases to create groups of consumers divided by market segments based on a combination of elements (e.g. gender, country of origin, age) up to more complex profiles based on preferences, online behavior and previous purchases. This activity is intended to allow us to develop products and services with characteristics in line with the preferences of our consumers and to allow us to send the user advertising communications as close as possible to their tastes, interests, needs.

The processing of such personal data will take place with automated processing tools which, following the crossing of the data, will create a commercial and behavioral profile of the user. Furthermore, such data and / or information will be associated with any and / or additional data and / or information already in our possession following the adhesion to our other services. The data collected for profiling purposes will be processed for a maximum period of 1 year from their collection.

Finally, the Data Controller may process the user's personal data also for sending communications aimed at market surveys, detecting the degree of satisfaction, sending commercial information on products and promotional initiatives by mail marketing and / or sms. -whatsapp, mail, telephone.

The legal basis that legitimizes this treatment is the consent of the interested party which can be revoked at any time. Your consent to receive these communications will be valid both for sending

through the use of automated systems without the intervention of an operator (e.g. e-mail, sms), and for traditional methods of contact (e.g. paper mail) .

The legal basis may be represented by the legitimate interest of the owner and therefore the consent of the interested party will not be required where the user has already made a previous purchase. In this case we will be able to use your e-mail address (provided at the time of purchase) for the purposes of direct sales and / or the promotion of our products similar to those already purchased, provided that the user does not object to such use by sending an email to [privacy@chemivit.com](mailto:privacy@chemivit.com) or by clicking on the appropriate link for the opposition to the receipt of communications considered unwanted, made available in the promotional emails sent by CHEMIVIT SRL.

## **Processing**

methods The processing of data for the purposes indicated above takes place mainly by means of IT methods and procedures, also with the aid of electronic means, telephone, telematic or automated or semi-automated means, including automated e-mail systems, SMS messages. / Whatsapp or other, solely for the purpose and only for the time necessary to achieve the purposes for which they were collected. The data will be processed only by the personnel expressly designated by the owner and according to the respective authorization profiles. Specific security measures are observed to prevent data loss, illicit or incorrect use and unauthorized access.

## **Access to data, communication and dissemination**

Access to personal data will be allowed only to authorized personnel according to the actual need to know such information and using access control tools on multiple levels. In fact, the employees of the Data Controller who need it for the execution of their duties or by virtue of the position they hold, or other subjects who provide services to the Data Controller (eg maintenance and / or management of the site) may have access. This staff has undertaken to comply with the confidentiality obligations and has been expressly designated as the person in charge and / or responsible for the processing, as required by current law.

The data collected through the individual services and for the purposes indicated in this information are generally communicated / made accessible to the following categories of subjects:

- subjects to whom the right to access them is provided for by provisions of law or regulations (eg. Security, Law Enforcement, Judicial Authorities)
- data processing and IT services companies (e.g. web hosting, management and maintenance of IT infrastructures and services, e-mail marketing, etc.)
- companies and firms that provide consulting services to the company
- in case of purchase of products: companies that provide payment services, Paypal, shipping companies, credit institutions, companies that carry out mailing and correspondence services.

Furthermore, to the extent permitted by law, the Data Controller may communicate personal data to third parties:

- where necessary to protect their legitimate interests (eg exercise one's right / defend oneself in court)
- in the event of complaints relating to the use of the website , where deemed necessary to investigate, prevent or take measures regarding illegal activities, suspected fraud or in the event that the Data Controller, in its sole discretion, considers that the use of the website by the user is incompatible with the conditions of the site web itself
- in the event of an express and legitimate request to the Public Security Authorities, Law Enforcement, Judicial Authorities.

The data being processed are not normally disclosed.

In some specific cases, however, we may ask you to release your personal data (including photographic and audio-video images) to allow you to participate in extraordinary and temporary thematic events and initiatives, which by their intrinsic nature provide for them. communication and dissemination. In these cases we will notify you by asking you to give express and specific consent to this effect.

We inform you that, in order to provide a complete service, our portal contains links to other websites, not managed by us. We are not responsible for errors, contents, cookies, publications of illegal moral content, advertisements, banners or files that do not comply with the regulations in force by sites not managed by us to which reference is made.

To improve the service offered, an immediate report of malfunctions, abuses or suggestions is welcome to the e-mail address: [privacy@chemivit.com](mailto:privacy@chemivit.com)

### **Place of processing**

Personal data are processed at the operational headquarters of the Data Controller and in any other place where parties involved in the processing are located (e.g. at the hosting company providing the service).

### **Data transfer to third countries**

If the data must be transferred abroad in order to pursue the purposes set out in this Privacy Policy, even where the legislation on personal data differs from that applicable in the country where the user is located, the joint controllers will take measures to ensure that such communications take place in compliance with European data protection standards or other local standards used in the country where the data is collected, so that user data remains secure and confidential.

### **Nature of the provision of data**

Apart from that specified for navigation data, the user is free to provide or not the personal data requested in the contact forms or in other forms that allow access to specific services (eg newsletters). Failure to provide them may make it impossible to use these services.

### **Security**

The owner has adopted the appropriate security measures to prevent unauthorized access, disclosure, modification or destruction of Personal Data.

In the management of this website, firewall technology and other procedure-based technological security measures are used. SSL (Secure Socket Layer) is active, an encryption tool that guarantees security during the transmission of information over the Internet.

The sending of the forms (filling in the contact forms) is protected by a security system automatically activated in background (recaptcha).

We adopt and require each service provider and / or third party responsible for the processing of personal data on our behalf to adopt, as per our instructions, technical and organizational measures to prevent the loss and destruction, even accidental, of data, the unauthorized access and illicit or abusive use of data. Furthermore, IT systems and software programs are configured so that personal and identifying data are used only when necessary to achieve the specific processing purposes envisaged from time to time. Although the joint controllers have implemented the aforementioned security measures for the website, the user must know that a minimum risk threshold is always present. Therefore, despite the security measures put in place to protect personal data, we cannot guarantee that no cases of data loss, misuse or alteration will occur.

In the unlikely event that we believe that the security of the user's personal data in our possession or under our control has been or may have been compromised, we will inform the user of the incident in the manner prescribed by applicable law, using the methods prescribed by it. By providing us with your e-mail address, you consent to receive such communications in electronic format through that e-mail address.

### **Privacy protection for minors**

The services on this site are intended for people aged 18 or over. We do not knowingly request, collect, use and disclose personal data provided by persons under the age of 18. If we become aware that we have collected data from a minor, we will immediately cancel it.

### **Rights of interested parties**

The users-visitors / users of the site enjoy the following rights pursuant to art. 15-22 of REG. (EU) 2016/679:

### ***Right of access***

The user has the right to know if the processing of personal data concerning him is in progress and - if confirmed to obtain a copy of such data and be informed su: the origin of the data; the categories of personal data processed; the recipients of the data; the purposes of the processing; the existence of an automated decision-making process, including profiling; the data retention period; the rights provided for by the Regulations.

### ***Right of rectification***

The user has the right to obtain the rectification of the data held by the Data Controller and concerning him or to integrate the data that are incomplete. When you communicate your data to use our services, you guarantee its truthfulness and accuracy. Help us to ensure that your data is always accurate by communicating any updates to [privacy@chemivit.com](mailto:privacy@chemivit.com)

### ***Right of cancellation***

The user has the right to request the cancellation of your personal data if they are no longer necessary for the purpose for which they are been collected or if we were no longer authorized to process them. The deletion of data is subject to the conservation obligations provided for by laws / regulations.

### ***Right to limitation of treatment***

The user has the right to obtain the limitation of treatment in the following cases provided for by art. 18 of the aforementioned Regulation: has contested the accuracy of personal data (you can request the limitation of processing for the period in which we will verify the accuracy of your data); we are not authorized to process your data and, instead of deleting them, you can ask us to limit their use; if the data we are in possession of - even if they are no longer necessary for us for the purposes of the processing for which they were collected - are necessary for you to ascertain, exercise or defend a right in court; the user has opposed a treatment based on our legitimate interest. Pending verification of the prevalence of our legitimate reasons with respect to those that refer to you as an interested party, you can ask us to limit the processing.

### ***Right to withdraw consent***

You can withdraw your consent in relation to all treatments based on it.

### ***Right to data portability***

In the event that we process your data on the basis of your consent or in execution of a contract, or the processing is carried out by automated means, you can exercise the right to data portability. Potrai quindi ricevere i dati personali che ci hai comunicato in un formato strutturato, di uso comune e leggibile da un dispositivo automatico. Potrai anche richiedere di trasmettere i tuoi dati direttamente ad un'altra società, purché ciò sia tecnicamente possibile

### ***Right to object***

You have the right to object at any time to the processing of your personal data based on our legitimate interest, including profiling.

For more information and / or to exercise the rights, the user can contact CHEMIVIT SRL by writing to the following address: [privacy@chemivit.com](mailto:privacy@chemivit.com)

### **Complaint and Appeal**

In addition to the above rights, the user if he believes that there has been an injury of their rights regarding the methods of managing personal data, you will have the right to lodge a complaint with the Guarantor Authority of the member state in which you reside and / or work habitually or of any other EU country or the European Economic Area where it took place the alleged violation or appeal to the ordinary judicial authority.

## **Updates**

This "privacy policy" information replaces and integrates the information provided previously. The Data Controller, at its discretion, reserves the right to change, modify, add or delete parts of this privacy statement at any time, by publishing the revised version on this website page. It is your responsibility to review the Privacy Policy from time to time to become aware of any changes made.

Following changes that provide for different treatments than those for which the user had previously given explicit consent, the user's data will not be processed without further explicit consent.