

Michele Dibenedetto & C. S.a.s. Via Vecchia Madonna dello Sterpeto, 29/31 76121 Barletta (BT)	Web Site Privacy Policy (according to EU General Data Protection Regulation n. 2016/679 and according to Italian Legislative Decree n. 101/2018)		Rev.	00
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Pursuant to art. 13 of the 2016/679 EU Regulation and in relation to the information that will come into possession, for the purposes of the protection of persons and other subjects regarding the processing of data, we inform you as follows:

INFORMATION COLLECTED BY THE WEB SITE (www.dibenedettosas.it)

The company "Michele Dibenedetto & C. S.a.s.", hereinafter the "company", manages and operates through its own showcase web site which serves as a company presentation or presentation of the different types of products and services, of the contacts that the user has the opportunity to exploit for the request for information, of the methods of ordering products through e-commerce (following registration and log-in), of the candidature offers for business profiles according to the requests for implementation of the company workforce. At the same time, the use of a website for direct purchases and online transactions is not envisaged, the user will be able by registration and subsequent log-in to send his own verification requests of products and services availability. The website acts as an information portal on the products marketed (under its own brand name "DBN Spare Parts" and brands of the main producers of elements and spare parts for the automotive sector) and services. At the same time, the "contacts" function is provided, that is customer support, which allows the sending of specific requests through email communication.

Below are the main data collection methods:

- 1) By request, from the user, on the services and products offered by the company;
- 2) Through correspondence, by the use of the indicated contact details (telephone number and e-mail);
- 3) Through job offers.

It is therefore necessary that the user can and should have read the privacy policies before starting the data acquisition and management process.

PURPOSE OF THE PROCESSING OF COLLECTED DATA

The personal data collected can be used for a variety of purposes:

- 1) purposes related to the supply of products and services;
- 2) purposes related to the search for business profiles for job offers;
- 3) purposes related to the development of statistics and interaction with external social networks / platforms;
- 4) purposes aimed at ensuring the legitimate processing of the data and necessary to ensure the user a service that meets needs and expectations.

LEGAL BASES OF THE TREATMENT

The processing of personal data by website platform is carried out on the basis of measures aimed at fulfilling a legal obligation with the consent given by the interested party, at any time freely revocable. Below are the main cases of use of the user's personal data and the legal bases on which they are based, for activities concerning the "contacts" platform from the website.

ACTIVITIES	LEGAL BASES
Management of user requests: Data processing to manage requests sent by the user through the website.	Legitimate interest in offering a good service through the website.
Optimization of site usability: Pre-compilation of data fields on the website to optimize and speed up the online experience.	Legitimate interest to optimize, simplifying and speeding up the use of the website.
Internal research and development activities: Internal activities concerning research, development and analysis (development of statistics and interaction with external social networks/platforms).	Legitimate interest in evaluating and improving the performance of services and managing the compliance of services.
Network and information security: Management of the security of the network communication and of the information contained, so as to allow the protection of user data from loss or damage, theft and unauthorized access.	Legal obligation to guarantee the security of the network communication and of the information contained.

DATA PROTECTION AND TRANSFER OF PERSONAL DATA

The protection of the collected data is achieved through appropriate security measures, considering the nature, the object, the context, the purposes of the processing and also the risk of probability and seriousness of injury to the rights of individuals. All data are treated in the maximum respect of the law: subjected to updates and conservation in a strictly necessary time, according to the time schedule

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required by law. The treatment process is carried out in complete safety in order to prevent access to third parties. At the same time the rights of the interested party are guaranteed:

- 1) to access personal data;
- 2) the possibility of checking the accuracy of the data;
- 3) the correction and/or integration;
- 4) to cancel or to limit the processing data;
- 5) the possibility of revoking the consent given also for individual types of processing, as well as guaranteeing the portability of the personal data collected.

The website does not offer the possibility of online purchases or direct transactions on online platforms, at the same time blocking and security systems ("https") are used, security protocols that allow identifying the user (for example, Transport Layer Security (TLS) and its predecessor Secure Sockets Layer (SSL)). The acquisition and management of customer data takes place for the purposes described. In this sense, all the acquisition of data concerning principally identifiable customers in legal entities (companies and similar) and in physical persons as needed. The purpose of this explanation is to identify the data acquired in information necessary to achieve the purposes described for commercial purposes. The commercial relations between the company and its customers are carried out both on the national territory and on foreign territory with potential subjects not operating in the EU member states (third countries). The acquisition and management of data for commercial purposes, and if necessary personal data, is carried out in the Italian national territory in agreement and application with what is regulated by EU Regulation 2016/679 and Legislative Decree 101/2018. Therefore we do not proceed with the transfer of data to third countries, but it is true that we proceed with the acquisition of data from economic subjects and operators (similar to customers) from third countries. In accordance with the relevant legislation, the transfer of personal data from countries belonging to the EU to "third" countries (not belonging to the EU or to the European Economic Area) is prohibited (art. 25, par. 1 of the Directive 95/46/CE), only if the "third" country in question does guarantee an "adequate" level of protection. The European Commission has established this adequacy through specific decisions (referred to in art. 25, par. 6 of Directive 95/46/CE). The transfer to third countries is also permitted in the cases mentioned in Art. 26, par. 1 of Directive 95/46/CE (consent of the person concerned, need for transfer for the purposes of contractual/pre-contractual measures, public interest, etc.), as well as on the bases of contractual instruments offering adequate guarantees (art.26, par. 2, of Directive 95/46/CE. The European Commission may establish that the level of protection offered in a particular country is adequate (Art.25, par. 6 of Directive 95/46/EC), and that it is therefore possible to transfer personal data. The decisions defined by the European Commission define specific agreements regarding the adequacy of third countries. The third countries concerned and the related decisions and actions taken by the European Commission, specifying that if it is necessary to transfer data to third countries, the operational indications set out in the following decisions of the European Commission will be implemented, as follows:

- ✓ Andorra (2010/625/UE);
- ✓ Argentina (Commission Decision of 30 June 2003 pursuant to Directive of the European Parliament and of the Council on the adequate protection of personal data provided by the Argentine Personal Information Protection and Electronic Documents Act);
- ✓ Faer Øer (2010/146/ Dec);
- ✓ Australia (Accordo Europa – Australia, PNR);
- ✓ Canada (2002/2/EC: Commission Decision of 20 December 2001 pursuant to Directive 95/46/EC of the European Parliament and of the Council on the adequate protection of personal data provided by the Canadian Personal Information Protection and Electronic Documents Act);
- ✓ Faer Øer (2010/146/ Commission Decision of 05 March 2010, pursuant to Directive 95/46/CE of European Parliament and of the Council on the adequate protection of personal data provided by the Fear Øer Personal Information Protection and Electronic Documents Act);
- ✓ Guernsey (2003/821/CE: Commission Decision of 21 November 2010, pursuant to Directive 95/46/CE of European Parliament and of the Council on the adequate protection of personal data provided by the Guernsey Personal Information Protection and Electronic Documents Act);
- ✓ Isle of Man (Commission decision of 28 April 2004 on the adequate protection of personal data in the Isle of Man);
- ✓ Israel (2011/61/EU: Commission Decision of 31 January 2011 pursuant to Directive 95/46/EC of the European Parliament and of the Council on the adequate protection of personal data by the State of Israel with regard to automated processing of personal data);
- ✓ Jersey (2008/393/CE: Commission Decision of 08 May 2008 pursuant to Directive 95/46/EC of the European Parliament and of the Council on the adequate protection of personal data provided by the Jersey Personal Information Protection and Electronic Documents Act);
- ✓ Nuova Zelanda (2013/65/UE- New Zeland);
- ✓ Switzerland (Commission Decision of 26 July 2000 pursuant to Directive Of the European Parliament);
- ✓ Uruguay (2012/484/EU: Commission Implementing Decision of 21 August 2012 pursuant to Directive 95/46/EC of the European Parliament and of the Council on the adequate protection of personal data by the Eastern Republic of Uruguay with regard to automated processing of personal data);
- ✓ USA (2016/1250: Commission Decision of 12 July 2016 pursuant to Directive 95/46/CE of European Parliament - UE-USA Shield. (Privacy Shield));
- ✓ USA (USA – PNR: Decision Commission of 14 May 2014 - Customs and Border Protection);
- ✓ (UE) 2016/2295 Decision Commission of 16 December 2016 to Directive 95/46/EC of the European Parliament and of the Council on the adequate protection of personal data;

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WHAT DATA ARE COLLECTED?

The data collected includes references to:

- 1) Name;
- 2) E-mail address;
- 3) Message object;
- 4) Curriculum vitae for job offers.

The personal data collected can be used for a variety of purposes:

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- ✓ purposes related to the development of statistics and interaction with external social networks / platforms;
- ✓ purposes aimed at ensuring the legitimate processing of the data and necessary to ensure the user a service that meets needs and expectations.

TERMS OF STORAGE OF CUSTOMERS DATA

The processing of data is carried out, according to legal obligations, to respond to requests for clarification and/or resolution of any disputes and to protect the legitimate interests of the data controller.

COMMUNICATION AND DISSEMINATION OF DATA

The data acquired can be communicated to the following subjects:

- ✓ To the third parties that need it according to legal obligations and / or according to explicit requests;
- ✓ To the third parties when there is an obligation to communicate or share the user's personal data to comply with a legal obligation, to give them application or to investigate, with the judicial police bodies in charge, about true or alleged violations.

DATA CONTROLLER

Michele Dibenedetto & C. S.a.s. – via Vecchia Madonna dello Sterpeto, 29/31 – 76121 Barletta (BT)



RIGHTS OF CUSTOMERS

At any time, the customer, in according to the articles, from 15 to 22, of EU General Data Protection Regulation n. 2016/679, has the right to:

- 1) access to data, receive a copy of them, as well as further information on the treatments in progress on them;
- 2) request confirmation of the existence of their data;
- 3) correction or updating of data processed, if they are incomplete or out of date;
- 4) cancellation of data from databases if the customer considers the treatment unnecessary or illegitimate;
- 5) obtain information about the purposes of the processing, the categories of data, recipients or categories of recipients to whom the data have been or will be communicated and, when possible, the retention period;
- 6) obtain the limitation of the treatment of data, if the customer considers these are not correct, and necessary or are illegitimately treated;
- 7) obtain data portability, so receive them from a data controller, in a structured format, commonly used and readable by automatic device, and transmit them to another data controller without any problem;
- 8) revoke the consent at any time without prejudice to the lawfulness of the treatment based on the consent given prior to the revocation;
- 9) oppose the processing of personal data;
- 10) propose a complaint to a supervisory authority;

The rights can be exercised with a written request sent to Data Controller, to the postal address of the registered office or to the email address: info@dibenedettosas.it

PROTECTION OF MINORS

In order to guarantee the protection of minors, the services rendered by the company that can determine the placement of potential contractual obligations, are reserved to subjects legally "qualified" to pursuant to the relevant legislation, are respected the limits, the methods and criteria for identifying "minor" and "non" subjects. To pursuant to the art. 8, par. 1 of Regulation (EU) 2016/679, a child who has reached the age of sixteen can express his consent to the processing of his personal data. The processing of personal data of the

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minor under the age of sixteen, based on the art. 6, par. 1, letter a) of Regulation (EU) 2016/679, is permitted on condition that it is provided by the person who exercises parental responsibility (Art. 2 – quinquies). In compliance with the protection of minors, it is necessary to specify that Legislative Decree 101/2018 in implementation of what has already been expressed by EU Regulation 2016/679 has in fact lowered the age limit to fourteen years to request for minors lower the consent of those who exercise parental responsibility.

