

## **Introduction**

This Privacy Policy describes the ways in which our site with address [www.reflexallen.com](http://www.reflexallen.com) is managed as regards the processing of personal data of users/visitors.

This notice is provided in accordance with Art. 13 of EU Regulation 2016/679 (hereinafter the "General Data Protection Regulation" or "GDPR") to those who connect to the above site.

The above-mentioned Web site belongs to Reflexallen S.r.l. an Italian limited liability company.

This notice is provided by Reflexallen only for the above-mentioned Web site and does not apply to other Web sites or sections, pages, spaces belonging to third parties users can connect to by clicking on links.

Users and visitors are kindly asked to carefully read this Privacy Policy prior to supplying any sort of personal information and/or filling in any digital form found on this site.

If users/visitors are required to give their personal details in order to use certain services, a notice will be provided on the pages related to individual services giving details on processing in accordance with Art. 13 of the GDPR, which will specify the manner, purposes and limits to processing.

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## **1. Data Holder, Data Processing Officers and Delegates**

The Data Holder of your personal data is Reflexallen S.r.l., with head office at Via Per Serravalle snc, 41052 Guiglia (MO), Italy, email: mail@reflexallen.com (hereinafter referred to as "RA").

Apart from the employees of RA (Processing Delegates), data may also be processed by third parties the Company assigns certain tasks connected to or instrumental for carrying out processing or the supply of services offered. If this is the case, the same subjects will be acting as Independent Data Holders, joint-Data Holders or External Data Processing Officers.

Data processed through this site will be processed electronically on behalf of RA by Pallino S.r.l., an Italian limited liability company with address Via Decorati al Valor Civile, 57/A, Padua, Italy.

## **2. Contact info of the Data Protection Officer ("DPO")**

The DPO designated by RA, representing the contact person for Data Subjects, can be contacted through the following channels: e-mail: privacy@reflexallengroup.com; fax: +39059792837; post: Reflexallen Srl, Via per Serravalle snc, 41052 Guiglia (MO), Italy.

## **3. Type of data processed, purposes and legal basis of processing**

### **3.1. Browsing data**

During normal operation computer systems and software used for keeping this site working collect some personal information which is then implicitly sent during use of Internet communication protocols.

Through matching and processing with data kept by third parties, this information could allow for identifying users/visitors (e.g. IP address, domain name of the PCs used by users/visitors that connect to the site, type of connection device used, etc.).

These data are utilised only for obtaining statistical information, therefore anonymous, and for ensuring that our site is working properly.

### **3.2. Data supplied voluntarily by users/visitors**

If after users/visitors connect to our site they submit their personal details in order to use certain services, or to make requests via electronic mail, their personal data will be obtained by RA and/or third parties with which RA could supply the service requested by the user/visitor; such data will only be processed for the request made, i.e. for supply of the service in accordance with this Policy and certain privacy notices provided upon registering for each service.

### **3.3. Processing for profiling purposes**

With the consent of the Data Subject, RA may use data provided voluntarily for improving the services offered based on the requirements of its customers and to obtain information about behaviour and commercial habits in the automotive and financial sector.

Profiling of individuals or groups may be carried out by processing data identifying the customer through a relation between data allowing for identifying data subjects and analytical indications related to their personal sphere (tastes, preferences, habits, needs and consumption choices).

Personal data will be processed electronically and by computer. Processing methods will be pertinent and not excessive with respect to the type of services rendered.

For processing of data selected for profiling it is a legal obligation to obtain the consent of the data subject - specifically for this purpose and separately - who is as of now informed that it is optional to provide consent and there are no consequences to refusing to provide it other than preventing processing for profiling purposes.

#### **3.4. Processing for direct marketing purposes**

With the specific consent of the data subject RA can use data provided voluntarily for direct marketing, for conducting studies, research, and for market statistics; for sending advertising and informative material; for direct sales activities and placing products or services; for sending commercial information; for sending interactive commercial messages.

For processing of data selected for direct marketing tasks it is a legal obligation to obtain the consent of the data subject - specifically for this purpose and separately - which is as of now informed that it is optional to provide consent and refusing to give it has no consequences (other than preventing processing for direct marketing purposes).

For some forms of communication via electronic mail, fax, automated calling systems and MMS and text messaging or other type of messages, the need to obtain specific and separate consent derives from provisions on the issue of unwanted messages or distance selling. In the latter cases, providing your data is entirely optional and there is no consequences for refusing to provide them other than preventing processing of your data.

The legal basis for the sorts of processing referred to in points 3.3 and 3.4 is represented by the consent given. The legal basis for the sorts of processing referred to in points 3.1 and 3.2 is represented by performance of the requested services or replying to the request of users/visitors.

#### **4. Addressees of personal data**

No data deriving from the Web service will be disclosed or diffused to third parties, except for fulfilment of obligations provided by law, regulations or community provisions.

Personal data supplied voluntarily by users/visitors will be disclosed to third parties only if disclosure is necessary for satisfying the requests of users/visitors, and the provisions of each Privacy Notice of each service apply.

#### **5. Transfer of data to other countries**

For the purposes specified in Art. 3 of this Privacy Notice, your personal data will not be disclosed/transferred to subjects established in countries not belonging to the European Union, except for the provisions on use of cookies; we suggest that you take a look at that section by clicking on this link [Cookie Policy](#).

#### **6. Processing methods and data storage period**

Data are processed by using automated instruments (e.g. by using electronic procedures and supports) and/or manually (for instance on hard copy) for the time strictly necessary for achieving the purposes for which the data were collected and in compliance with applicable normative provisions.

Personal data will be kept for the length of time strictly necessary for pursuing the aims of specific purposes of processing, in particular:

- for the data specified in Art. 3.1, for the time it takes to carry out certain tasks, unless verifications of computer crimes at the expense of the site are in progress;
- for data specified in Art. 3.2, for the time it takes to perform the requested services or reply to requests made, unless verifications of computer crimes at the expense of the site are in progress; any further details on storage of data concerning an individual service or request made may be found in certain privacy notices of the requested service;
- for the purposes specified in Art. 3.3. (profiling) for 12 (twelve) months from the moment specific consent for processing was given by users/visitors;
- for the purposes specified in Art. 3.4. (marketing) for 24 (twenty-four) months from the moment specific consent for processing was given by users/visitors.

## 7. Rights of the Data Subject

Users/visitors may exercise the rights specified below at any time.

- a. Access to personal data: to obtain confirmation as to whether his or her personal data are being processed and if so, to obtain the following information: the purposes; the categories of data; the addressees; the storage period; the right to file a complaint with a controlling authority; the right to ask for correction, deletion or restriction of processing or to oppose processing and the existence of an automated decision-making system;
- b. Request correction or deletion of the same or restriction to processing of his or her data; the term "restriction" means marking the data kept with the intention of limiting processing of the data in future;
- c. **Opposition to processing: to object to processing of the data for reasons connected with a particular situation, for carrying out a task of public interest or for looking after a lawful interest of Data Holders;**
- d. Data portability: in case of automated processing carried out based on consent or execution of a contract, to receive the personal data regarding the data subject in a structured format, commonly used and legible by an automatic device; in particular, the data will be supplied by Data Holders in .XML format or similar format;
- e. Withdraw consent to processing for direct and indirect marketing purposes, market research and profiling purposes; exercise of such right does not prejudice in any way the lawfulness of processing carried out prior to withdrawal of consent;
- f. File a complaint with the concerned controlling authority based on the place of residence, the place of employment or place where rights were violated, in accordance with Art. 77 of GDPR; for Italy the Data Protection Authority is the concerned party, which may be contacted with the contact details provided at the Web site <http://www.garanteprivacy.it>.

The above-mentioned rights may be exercised by sending a request to the Data Holder through the contact channels indicated in Art. 1 of this notice.

Request for exercising rights shall be satisfied without unjustified delay within one month from the request; for extremely complex cases and when there is a large number of requests the deadline may be extended by a further 2 (two) months.

## 8. Disclosure and providing data

Except for what is specified for data referred to in Art. 3.1 (browsing data, not included when there was no browsing of the site), users/visitors are free to provide their personal data and refusing to do so will only make it impossible for them to obtain the requested service.

## 9. Updates and amendments to the Privacy Policy

This Privacy Policy is subject to change due to the coming into force of new regulations in this sector, updates, supply of new services and technological innovations. We suggest that users/visitors take a look at this page regularly.