

**Updated on 01/07/2021**

## **PRIVACY POLICY**

This policy has been drawn up and personalised for visitors of the [www.coem.it](http://www.coem.it), [www.fioranese.it](http://www.fioranese.it), [www.coemgreen.it](http://www.coemgreen.it), [www.coemfioranesecoverings.com](http://www.coemfioranesecoverings.com), [www.piastrellecementine.it](http://www.piastrellecementine.it), [www.coemfioranesevents.com](http://www.coemfioranesevents.com), [www.lifetiles.it](http://www.lifetiles.it) websites.

This document annuls and fully replaces the document previously published on the subject of cookies.

## **WEBSITE POLICY PURSUANT TO THE PROVISIONS OF ART. 13 AND 14 OF EUROPEAN REGULATION 2016/679 (GDPR)**

Specific summary information is progressively indicated or displayed on the website pages dedicated to particular services on request that have forms for the collection of data. We also inform you that, to provide a complete service, our website may contain links to other websites, not managed by COEM S.p.A.

COEM S.p.A. is not liable for errors, contents, cookies, the publication of illicit moral content, advertising, banners or files not conforming to the laws in force and for compliance with the Privacy regulation on the part of sites not managed by the Data Controller.

Pursuant to and in accordance with articles 13 and 14 of European Regulation 2016/679, in its capacity as Data Controller of your personal data, COEM S.p.A. hereby informs you that the aforementioned regulation establishes the protection of data subjects as regards personal data processing and that said processing shall be characterised by the principles of lawfulness, fairness and transparency and the protection of your confidentiality and rights. The personal data and information submitted by you or otherwise acquired while using the website shall be processed in compliance with legal provisions set forth in the aforementioned regulation and with the confidentiality obligations established therein.

## **DATA SUBJECTS AND STORAGE TIME**

**A) users (surfers) of the** dei siti web [www.coem.it](http://www.coem.it), [www.fioranese.it](http://www.fioranese.it), [www.coemgreen.it](http://www.coemgreen.it), [www.coemfioranesecoverings.com](http://www.coemfioranesecoverings.com), [www.piastrellecementine.it](http://www.piastrellecementine.it), [www.coemfioranesevents.com](http://www.coemfioranesevents.com), [www.lifetiles.it](http://www.lifetiles.it) websites.

### **Type of data processed**

- Browsing Data: *the IP addresses or domain names of the computers and other devices used by users who connect to the site; the URI (Uniform Resource Identifier) addresses of the requested resources and any time indications relating to them; parameters relating to the user's operating system and IT environment; start and finish pages; Browsing Index and identifying behaviours during the display of site pages.*
- Personal data supplied voluntarily by the user: *the optional, explicit, voluntary sending of emails to the addresses provided on this site and the compilation of its forms implies the subsequent acquisition of the sender's personal data (for example, name, surname and e-mail address). Specific, summarised information is provided on the pages where forms are available.*

Purpose of processing: *your data collected during browsing will be processed for the following purposes.*

- *1) the performance of operations strictly related to and necessary for the management of relations with users or with visitors of the website;*
- *2) the collection, storage and processing of your data for statistical analyses, also in anonymous and/or aggregate form; statistical analyses aimed at verifying the quality of the services offered by the site;*
- *3) sharing with social network managers and third parties the interactions carried out and the Usage Data relating to the pages where cookies that integrate software functions or products are installed;*
- *4) improving the browsing experience in order to send services and advertising messages in line with the preferences shown during browsing*

Data processing for fulfilling the purposes stated in points 1 and 2 is necessary in order to fulfil your request and any refusal may limit and/or prevent full use of the functionalities and services available on the website. The legal basis for the processing of your data for the purposes as per points 1 and 2 is the satisfaction of your request, pursuant to article 6.1.b.) of the GDPR; your refusal to provide said data would imply the impossibility of consulting the Website. The provision of data specified in purpose 3 and 4 is optional on the legal basis of consent, and any objection to processing shall not affect the functionality and services on the website. The legal basis for the processing of your data for the purposes as per points 3 and 4 is optional, pursuant to article 6.1.a). Consent is provided through the brief policy by clicking on the word "Accept all necessary cookies" inside it. With regard to the optional provision of data,

more information is provided on the cookies present on the site in the cookie policy document, which can also be accessed from the brief policy.

The browsing data are stored for the time frames specified in the cookie policy, which is available on the site.

Data processing for fulfilling the purposes stated.

### **B) Download**

When you fill in the “download” form accessible from sponsored posts, your common data will be used to allow you to download our catalogues or magazines, in full compliance with the principles of lawfulness and correctness, and with the legal measures in force. Your data are provided for this purpose in order to meet your request. The legal basis for processing is art. 6.1.b) of the GDPR. Your data will be stored for the length of time necessary to provide the service you requested.

### **C) Newsletter**

When you fill in the form accessible in the “Newsletter” sections, your common personal data will be used to respond to your request for the sending of the newsletter and subscription to the mailing list for marketing activities, newsletters, sending of promotional, commercial and advertising material, or material regarding events and activities of the Data Controller via e-mail, software systems managed by third parties in full compliance with the principles of lawfulness and correctness, and with the legal measures in force. It is not mandatory to provide your personal data, but refusal to do so will make it impossible for us to respond to your request for subscription to the newsletter and to inform you on new developments at COEM. The legal basis for processing is art. 6.1.a) of the GDPR. You may oppose processing at any time by using the “UNSUBSCRIBE” link at the bottom of the e-mail, or by sending a request to the Data Controller at the contact details indicated in this privacy disclosure. Your data will be stored until you decide to cancel your subscription.

### **COOKIES AND OTHER TRACKING SYSTEMS**

Your data are also acquired by means of tools and services provided by third parties and stored by the same. For further information, please read the [cookie policy](#).

Please note that COEM S.p.A. is merely an intermediary for the links indicated in the cookie policy and cannot be held in any way liable in the event of any modifications.

### **PERSONAL DATA PROCESSING METHODS**

Your personal data will be processed with manual, electronic and/or telematic methods, automated contact means (e.g. automated e-mail sending campaigns, etc.) through the use of cookies (as indicated in the cookie policy available on the site), in compliance with the procedures indicated as per articles 6 and 32 of the GDPR and through the adoption of appropriate security measures provided for.

In order to compare and where possible improve communication results, the Data Controller uses systems for the sending of newsletters and promotional communications with reports. These reports provide the Data Controller with information on, for example: number of readers, newsletters opened, unique clickers and clicks; the devices (iPhone, Blackberry, Nokia...) and operating systems (Windows, Apple, Linux, Android...) used to read the communication. They also provide details on: the activity of individual users; the number of users with subscription confirmation pending; e-mails sent per date/our/minute; e-mails delivered and not delivered; users who have unsubscribed from the newsletter, or forwarded it; users who have opened an e-mail or clicked on a single link; users with problems viewing the message; link tracking (i.e. the number of times the link in the message has been clicked); click tracking (which links have been clicked and by whom). All these data are used in order to compare and where possible improve communication results.

### **USE OF SOCIAL MEDIA PLATFORMS**

COEM S.p.A. may also provide links to other social media platforms which lead to servers installed by individuals or organisations over which it has no control. COEM S.p.A. provides no representation, nor does it take any responsibility for the accuracy or any other aspect of the information available on such sites. The link to a third-party website cannot be considered as validation, either by COEM S.p.A., or by the said third party, of the products and services of others or of the said third party. COEM S.p.A. does not issue declarations or guarantees regarding the use or storage of the user’s data with third-party sites. We invite users to examine the privacy policy that governs the third-party sites linked to our website carefully in order to have a complete view of the possible use of your personal data.

## RECIPIENTS OF PERSONAL DATA AND DATA DISSEMINATION

Your data will be processed by duly authorised staff and will be disclosed to companies acting in their capacity as Data Processor:

- external entities providing in-cloud services;
- technical assistance providers;
- third party service providers
- social media platforms that offer sponsored post services (e.g., Facebook etc.);
- MailUp for newsletter management.

You may request the full list by writing to the Data Controller.

Your data will not be disseminated.

## TRANSFER OF PERSONAL DATA

Your data are transferred to countries not belonging to the European Union, as indicated in the Cookie Policy of the companies that provide the services relating to third-party cookies or sponsored posts. For further information, write to [privacy.coem@coem.it](mailto:privacy.coem@coem.it)

## DATA CONTROLLER

The Data Controller is COEM S.p.A., with registered office in Via Cameazzo 25 – 41042 Fiorano Modenese (MO), Italy. The Data Controller, in accordance with the law, is the sender of this document, COEM S.p.A. (Via Cameazzo 25 – 41042 Fiorano Modenese (MO) Italy - [privacy@coem.it](mailto:privacy@coem.it)) in the person of its pro tempore Legal Representative.

You have the right to obtain from the Data Controller the erasure (right to be forgotten), limitation, updating, rectification, portability, objection to the processing of personal data concerning you, and in general you can exercise all the rights provided for in Articles 15 and following of European Regulation 2016/679 by sending an e-mail to [privacy@coem.it](mailto:privacy@coem.it). The data subject can also lodge a complaint with the Supervisory Authority.

## APPLICATION OF THIS POLICY

If you have any doubts regarding this Policy, please contact COEM S.p.A. by sending an e-mail to [privacy@coem.it](mailto:privacy@coem.it) or contact the Data Controller at the company contact addresses provided in the document.

## AMENDMENTS TO THIS POLICY

COEM S.p.A. reserves the right to update this policy in order to adapt it to any changes in the law and with due consideration of any suggestions submitted by employees, customers, associates and users. In the event of amendments on the part of COEM S.p.A., the Privacy Policy on the main Privacy page and on the Homepage of website will be promptly updated.

## RIGHTS OF DATA SUBJECTS

### EU Regulation 2016/679: Articles 15, 16, 17, 18, 19, 20, 21, 22 - Rights of the data subject

1. The data subject is entitled to obtain confirmation as to the existence or otherwise of personal data concerning them, even if said data is yet to be recorded, and the disclosure of said data in an intelligible form, as well as to lodge a complaint with the Supervisory Authority.
2. The data subject has the right to receive the following information:
  - a) the source of personal data;
  - b) the purposes and processing methods;
  - c) the logic applied in the event processing is carried out by electronic instruments;
  - d) the identification details of the data controller, of the processors and of the appointed representative according to art. 5, para. 2;
  - e) the individuals and legal entities and categories of individuals and legal entities to whom the personal data may be disclosed or who may become aware of said data in their capacity as designated representative in the country, as data processors or personnel authorised to process personal data.
3. The data subject is entitled to obtain:
  - a) the updating, rectification or, if interested, the integration of data;
  - b) the erasure and transformation into anonymous form of any unlawfully processed data or data blocks, including those whose retention is not required in relation to purposes for which data were collected or successively processed;
  - c) certification that the operations specified in letters a) and b) have been brought to the attention, together with their content, of those to whom data has been communicated or disclosed, unless this proves impossible or requires the use of means clearly disproportionate to the right of being protected;
  - d) data portability.
4. The data subject is entitled to raise a total or partial objection:
  - a) for legitimate reasons, to the processing of the personal data concerning them, also if pertaining to the purpose of collection;
  - b) to the processing of personal data for the purpose of sending advertising materials or making direct sales or for carrying out market surveys or sales communications.

