

WEB PRIVACY POLICY - Information document pursuant to and for the purposes of Article 13, Regulation (EU) 2016/679

Pursuant to [Regulation \(EU\) 2016/679](#) (hereinafter referred to as "GDPR"), this page describes how we process personal data. This information is provided in accordance with Article 13 of the GDPR. The information does not apply to other third-party websites that may be accessed via links on this website, for which we accept no liability.

Personal data that can be processed

Personal data: any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person (C26, C27, C30 GDPR).

Browsing data

The computer systems and software procedures used to operate this site acquire, during their normal operation, certain personal data whose transmission is implicit in the use of Internet communication protocols.

This category of data includes IP addresses or domain names of the computers and terminals used by users, the URI/URL (Uniform Resource Identifier/Locator) notation addresses of the resources requested, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the user's operating system and IT environment.

Data communicated voluntarily

The optional, explicit, and voluntary sending of messages to the contact addresses indicated on this site and/or the filling in of data collection forms entails the subsequent acquisition of the sender's address, which is necessary to reply to requests, as well as any other personal data entered.

Information about the processing of personal data carried out through social media platforms

With regard to the processing of personal data carried out by the managers of the social media platforms used by the Controller, please refer to the information provided by them through their respective privacy policies. The Controller processes the personal data provided by users through the pages of the dedicated social media platforms in order to manage interactions with users (comments, public posts, etc.) and in compliance with the regulations in force.

Specific Disclosures: Specific disclosures regarding particular services or data processing may be present on certain pages of the site.

COOKIES: For information on cookies and other tracking systems, please refer to the cookies policy in the footer of the site or at the following [link](#).

DATA CONTROLLER: Pursuant to Articles 4 and 24 of EU Regulation 2016/679, the Data Controller is ALGO SPA, with its registered office at Via Brianza 13, Albavilla (CO), represented by its pro-tempore Legal Representative.

PURPOSE | LEGAL BASIS | STORAGE PERIOD | NATURE OF DATA PROVISION

	PURPOSES FOR THE PROCESSING	LEGAL BASIS	DATA STORAGE PERIOD	NATURE OF DATA PROVISION
A)	<p>Navigation on this website involves activities strictly necessary for the operation of the site and the provision of the platform navigation service. The data required to use the web services will also be processed to:</p> <ul style="list-style-type: none"> • obtain statistical information on the use of the services (most visited pages, number of visitors per time slot or per day, geographical areas of origin, etc.); • ensure the proper functioning of the services offered. 	<p>Legitimate interest rights of the data subject</p> <p>Art. 6, letter f) and Recital 47 of the GDPR state that processing is necessary to pursue the legitimate interests of the data controller or third parties.</p>	For the duration of the browsing session and up to an additional 7 days maximum (subject to any investigation of offences by the Judicial Authority).	Necessary to ensure navigation.
B)	<p>Analysis of navigation through the use of cookies and similar technologies</p> <p>Further details are available in the cookie policy.</p>	Processing of essential non-technical cookies and similar technologies relies on consent for the processing of personal data (Art. 6 par. 1 let. a and C42, C43 GDPR). Consent is obtained through the website's banner and cookie policy.	Additional information can be found within the cookie policy.	Additional information can be found within the cookie policy.
C)	<p>Request for contact or information via telephone, dedicated form, WhatsApp button widget, or similar systems</p>	The processing is essential for executing a contract to which the data subject is a party or for carrying out pre-contractual measures at the data subject's request, as per Art. 6, par. 1, letter b and (C44) of the GDPR.	1 year	Necessary for pursuing the legitimate interests of the controller, while respecting the fundamental rights and freedoms of the user.

D)	<p>Direct marketing, for sending advertising or direct sales material, conducting market research, commercial and promotional communications, and newsletters, using both automated means (e-mail, SMS) and traditional means (telephone and postal mail). Communications may include promotional activities and/or logos of third-party partners and group companies. There will be no transfer of personal data.</p> <p>For a complete list of group companies and partners, please write to the addresses below.</p>	<p>Consent to the processing of personal data</p> <p>art. 6, par., 1 lett. a) - (C42, C43) GDPR</p>	<p>Until consent is revoked (or opt-out)</p>	<p>Providing data is optional. Failure to provide the necessary data will result in the impossibility of receiving direct marketing communications.</p>
E)	<p>Handling requests from data subjects to exercise their rights under Art. 15 et seq. of the GDPR (data subject's rights).</p>	<p>The processing is necessary to fulfill a legal obligation imposed on the data controller.</p> <p>Art. 6, par. 1, lett. c) and (C45) GDPR</p>	<p>5 years from the closure of the request, except litigations.</p>	<p>The provision of personal data is mandatory as it is essential to fulfill legal obligations.</p>
F)	<p>Personnel selection involves applying for roles, conducting personnel research, and engaging in selection activities with the aim of establishing potential employment relationships. This process includes considering candidates for positions other than those for which they originally applied, storing personal data for future selections, managing applications in response to job offers published on our website, and conducting interviews, including video interviews (with associated image/audio data processing). For further details, please refer to the specific information in the dedicated area.</p>	<p>Processing is necessary for the performance of a contract to which the data subject is a party or for pre-contractual measures taken at the data subject's request</p> <p>art. 6, par., 1 lett. a) - (C42, C43) GDPR</p>	<p>In principle, data collected during the recruitment process will be deleted within 24 months, or as soon as it is clear that no offer of employment will be made or that the offer will not be accepted by the candidate.</p>	<p>Providing this data is necessary, and failure to do so will result in an inability to apply.</p>
G)	<p>To sign in and log in the reserved area</p>	<p>Processing is necessary for the performance of a contract to which the data subject is a party or for pre-contractual measures taken at the data subject's request</p> <p>art. 6, par., 1 lett. a) - (C42, C43) GDPR</p>	<p>This will continue until the contract is terminated and the technical time required to disable the credentials has passed.</p>	<p>Providing this data is necessary; failure to do so will make it impossible to access the reserved area.</p>
H)	<p>Administrative-accounting purposes, to enable the performance of the contract existing between the parties (e.g. to enable the delivery of purchased products).</p>	<p>Processing is necessary for the performance of a contract to which the data subject is a party or for pre-contractual measures taken at the data subject's request</p> <p>art. 6, par., 1 lett. a) - (C42, C43) GDPR</p>	<p>10 years for administrative purposes or for a longer period if otherwise indicated by law (art. 2220 C.C.).</p>	<p>Providing this data is necessary; failure to do so will make it impossible to access sign the contract.</p>

DATA RECIPIENTS OR CATEGORIES OF RECIPIENTS

Personal data will be disclosed, according to the purposes outlined in specific sections, to entities processing the data as independent data controllers or data processors (**Article 28 GDPR**) and processed by individuals (**Article 29 GDPR**) acting under the authority of the controllers and processors based on specific instructions regarding the purposes and methods of processing for specific purposes in the relevant area.

Data will be disclosed to recipients belonging to the following categories:

- Entities providing services for the website and communication networks, including email, hosting, and platform management;
- Entities providing consultancy and assistance services;
- Entities providing services related to the management of the previously mentioned processing purposes;
- Entities based in Italy, with whom the Controller has agreements and prior consent, where required;
- For the "work with us" area, entities managing recruitment activities;
- Competent authorities for compliance with legal obligations and/or public body requests.

The list of data processors is available upon request by writing to: privacy@algogroup.net.

DATA TRANSFER TO A THIRD COUNTRY AND/OR INTERNATIONAL ORGANISATION

Personal data will not be transferred to countries outside the EEA. Data will be stored in Italy for hosting services, site management, development, and maintenance. All third parties to whom the data may be communicated are based in Italy.

AUTOMATED PROCESSES

Personal data will be processed manually, electronically, and automatically. Please note that no fully automated decision-making processes are conducted. Profiling activities, carried out with the express consent of the data subject as stated in the purposes, will involve an operator who will process the data subject's profile and analyse their habits and consumption choices to improve the commercial offers and services of the data controller (non-automated profiling).

RIGHTS OF THE DATA SUBJECT

You may exercise your rights as stated in Art. 15 et seq. GDPR by contacting the Data Controller at the above e-mail address. You have the right to request **access** to your personal data (Art. 15), **rectification** (Art. 16), **erasure** (Art. 17), and **restriction** of processing (Art. 18) at any time. The data controller shall inform (Art. 19) each recipient to whom the personal data has been transmitted of any rectification, erasure, or restriction of processing carried out, and shall inform the data subject of these recipients if requested.

In applicable cases, you have the right to data **portability** (Art. 20), where data will be provided in a structured, commonly used, and machine-readable format. You have the right to **object** (Art. 21) at any time to the processing of data based on legitimate interest. If the legal basis is consent, you have the right to withdraw consent without affecting the lawfulness of processing based on consent before withdrawal.

To stop receiving automated direct marketing communications (e-mail, instant messaging) or to revoke your consent to (non-automated) profiling, please contact the Data Controller at: privacy@algogroup.net.

If you believe that the processing of your personal data by the Data Controller violates Regulation (EU) 2016/679, you have the right to lodge a complaint with the Supervisory Authority, particularly in the Member State where you normally reside, work, or where the alleged violation occurred (Data Protection Authority <https://www.garanteprivacy.it/>), or to take appropriate legal action.

Date of update: 12th December 2023.

The Data Controller reserves the right to amend, update, add or remove parts of this notice.

ALGO SPA