

PRIVACY POLICY - GDPR UE 679:2016

SCOPE & PURPOSES

The COMERIO ERCOLE SPA board has defined, disclosed and is committed to maintaining this Privacy Policy active at all levels of its organization. The purpose of this policy is to ensure the protection and security of the information and data managed as part of its activities from all internal or external, deliberate or accidental threats, in accordance with the guidelines provided by the EU Regulation 679/2016.

FIELD OF APPLICATION

This policy applies without distinction to all organs and levels of the Company. The implementation of this policy is mandatory for all staff and must be inserted in the regulation of agreements with any external party who, for whatever reason, may be involved with the information processing falling within the scope of the Management System Policy. The company provides communication and dissemination of information to the outside only for the proper conduct of business activities that must take place in accordance with the mandatory rules and standards.

BUSINESS POLICY CONCERNING INFORMATION SECURITY

The information assets to be protected is the set of information managed through the services provided and localized in all company's offices. It is therefore necessary to ensure:

- the confidentiality of information, that means the information should be accessible to authorized people only;
- the integrity of information, namely protection of the accuracy and completeness of the information and the methods for their processing;
- the availability of information, i.e. authorized users can access to information and related assets when they require it;

RESPONSIBILITY FOR COMPLIANCE & IMPLEMENTATION

The compliance and implementation of the policy are responsibility of:

- 1) Everyone who, for any reason, collaborates with the company and is in some way involved with the processing of data and information that fall within the scope of the Privacy Management System. All staff are also responsible for reporting all anomalies and violations they become aware of.
- 2) All third parties that have relationships and collaborate with the company must ensure compliance with the requirements of this policy.

The person in charge for the Privacy Management System must:

- manage risk analysis with the appropriate methodologies and adopt all the measures for their management;
- establish all the rules necessary for the safe performance of all company activities;
- check the security violations and take the necessary countermeasures and control the company exposure to the main threats and risks;
- organize training and promote staff awareness about everything related to quality, safety and information security;
- periodically verify the effectiveness and efficiency of the Privacy Management System.

DATA CONTROLLER AND DATA PROCESSORS

The Data Controller is COMERIO ERCOLE SPA with registered office in Via Castellanza, 100, 21052 Busto Arsizio (VA). The requests relating to the exercise of the aforementioned rights can be forwarded, in writing, also by e-mail to privacy@comercole.it. The full list of the persons in charge can be requested via e-mail at the same address.