

PRIVACY POLICY

Privacy Policy / Data Protection Declaration

Protecting and securing our users' data is important to us. Because of this, we take all the technical and organisational steps necessary to protect the information we access. The services provided by this site are for those older than 18 years, CONSORZIO ERP ITALIA confirms that if it becomes aware that a minor has sent the data, it will be deleted at once.

The policy about information such as the type and extent of personal data processing carried out on this website required to be provided to the user under Article 13 of the European General Data Protection Regulation 2016/679 (GDPR) can be found below. This policy is supplied exclusively for the data controller's website and not for other websites that the user might visit. No profiling of site users is carried out.

1. Data controller

CONSORZIO ERP ITALIA (ERP)

Via Roma 74, 20060 Cassina De' Pecchi (MI)

italy@erp-recycling.org

2. This website's Data processing

Automatic recording of Data

The user's visit to the website is recorded. The following data transmitted from the user's browser is recorded:

- IP address used by the user's PC or router
- date and time
- browser type and version
- user PC operating system
- viewed pages
- name and size of required files
- the reference web page URL.

This data is collected exclusively for security purposes, to improve our website and analyse errors based on our legitimate interest as provided by GDPR Article 6.1f). The data could be used to identify those responsible if there are any crimes against the site or third parties. In this case, web contact data is not retained for more than seven days. Note: our website supports IP address obscuration and anonymisation.

Newsletter policy

Data is used to send site users periodic promotional e-mail newsletters on Consorzio ERP Italia (ERP) activity after they have completed the online form. The processing of user data is based on consent. To give consent to the receipt of promotional newsletters, users must read this Privacy policy and select the check box located next to the Newsletter form. The data is communicated to ERP Italia Servizi srl, to which ERP has assigned the task of managing this website, and to the IT company that manages the site (their appointments as data processor under Art. 28 of EU Reg. 2016/679 are filed at the company headquarters). Data is not transferred outside the European Union (please also refer to section 3. Personal data Recipients). Data is kept until users request its deletion. User rights: data access, correction, integration, and erasure; processing limitation; request for data portability; revoke consent without prejudice; lodge a complaint with a supervisory authority and any other administrative or judicial remedy. Only those older than 18 years can send their data. If it is confirmed that data was sent by a minor, ERP will delete it at once.

Data provided voluntarily by the user

The user can send ERP third-party personal data while using some site services. In these cases, the user acts as an independent data controller, assuming all legal obligations and responsibilities. If the site user provides or processes third-party personal data, they must ensure that the processing is based on one of the legal bases in GDPR Art. 6, assuming all responsibilities. The user shall hold ERP harmless if there is a dispute or request for compensation for damages by third parties for data processing by users who used the site functions in violation of the relevant personal data protection rules.

Applications

Only applications sent to the e-mail address info@erpitaliaservizi.it can be processed. Applications sent to another ERP address will not be recognised by the system and will not be considered.

Résumé data is processed to evaluate the candidate's professional profile and to contact them to arrange an interview. The user is obliged to communicate only the necessary data. The processing of data is based on pre-contractual measures taken at the user's request (GDPR Article 6 paragraph 1 letter b)). When sending special categories of personal data (data which reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, or union membership, genetic data, biometric data, data related to health, sexual life or orientation) without an explicit consent to process it, ERP cannot be held liable nor receive any complaints as the processing will be lawful as it relates to data made manifestly public by the data subject (GDPR Article 9 paragraph 1 letter e)). It is vital to express the explicit consent to the processing of special categories of personal data if the user wishes to share it. If ERP is not interested in the candidate's professional profile, we will delete the data it has just received or at the end of the interview, otherwise if it considers the professional profile interesting but no employment relationship is established, keep the data for n. 6 months in order to be able to contact the candidate in the future for other possible job interviews. In the event of a cognitive interview and / or the establishment of an employment relationship, a specific privacy statement will be provided to the candidate. Finally, please refer to section 3. Personal data Recipients.

Sending emails and the "Contact us" form

Personal data (name, address, etc.) shared voluntarily, for example in a request sent by email to the addresses shown on the site, is stored and processed by us only for communications with the user and the purposes for which it has been made available to us. The processing legal basis is Art. 6 paragraph 1 letter b) because the processing is necessary to supply services or feedback at the user's request. By sending the Contact Us Form, the user authorises us to process their data for the purpose indicated by the user who may revoke their consent at any time by contacting us. Data processing is based on GDPR Art. 6, paragraph 1 letter a) (user consent). The privacy policy is provided when completing the form.

The user is obliged to send only the necessary data. If the user sends special categories of personal data, please refer to the "Application" section, while if sending third-party personal data, please refer to the "Data provided voluntarily by the user" section. We offer the user the possibility of requesting a periodic promotional newsletter by email on Consorzio ERP Italia through the "Contact Us" section. Data processing is based on GDPR Art. 6, paragraph 1 let. a) (user consent). The privacy policy is provided when completing the form. Please refer to section 3. Personal data Recipients.

Use of cookies

Cookies are data files that websites send to user internet devices (usually browsers) where they are stored and retransmitted to the same sites at the next user visit. Cookies can be:

- 1) technical (ensure site usability, allow the browsing parameter choice and login);
- 2) profiling (to send promotional messages based on the user preferences);
- 3) third party (not installed by the sites that users visit, but by third-party sites).

Cookies may disappear when the browser is closed (session cookies) or persist in user devices for some time until their pre-established expiry date (persistent cookies). Users can always choose which cookies to authorise on their devices through browser configurations:

<https://support.microsoft.com/it-it/help/17442/windows-internet-explorer-delete-manage-cookies>

<https://support.mozilla.org/it/kb/Attivare%2520e%2520disattivare%2520i%2520cookie>

<https://support.google.com/chrome/answer/95647?hl=it&topic=14666&ctx=topic>

<https://www.opera.com/help/tutorials/security/privacy/>

<https://support.apple.com/it-it/guide/safari/sfri11471/mac>

Further information can be found at <http://www.youronlinechoices.com/it/>

If technical cookies are disabled, the site user may have difficulty consulting it, or some of the site's services may not be available. User consent is not required for technical cookies as these are used to send a communication over an electronic network or provide a user-requested service.

This website uses a permanent technical cookie that lasts 30 days and is used to remember whether the user has accepted cookies or not.

The site uses third-party cookies, i.e. cookies installed by sites or web servers other than ERP's.

These third parties operate as independent data controllers for data collected through their cookies, and users must refer to their policy on personal data processing and any forms of consent collection (selection and de-selection of cookies). Users who do not authorise cookies indicated by third

parties can visit this site, but ERP has no control over such cookies. To oppose the sending of third-party cookies, the user must access the consent forms provided by those third parties or using the browser settings.

Google Analytics data collection

This website uses Google Analytics, a web analytics service provided by Google Inc. ("Google"). Google Analytics uses "cookies", which are text files placed on the user computer, to help the website analyse site use. Data processing is based on GDPR Art. 6, paragraph 1, letter f), i.e. the ERP legitimate interest to collect information, in aggregate format, on the number of users and their site use.

This website has activated the anonymisation of IP addresses; Google shortens the user's IP address within the borders of the European Union member states or other countries belonging to the European Economic Area. Please note that the "anonymizelp" code has been added to Google Analytics on this website to ensure an anonymised version of user IP addresses. Google uses this information on behalf of the website operator to evaluate the use of the website by the user, to draw up reports on the operator activities and provide the latter with other services associated with website and Internet use. The IP address transmitted to Google Analytics from the user's browser is not grouped with other data processed by Google.

Users can consult the Google Inc. privacy policy about the Google Analytics service, at <https://support.google.com/analytics/answer/6004245>

It is possible to prevent Google from acquiring the data generated by cookies, the website use by the user (including IP address) and related processing by Google, by downloading and installing the browser plugin available at the following link: <https://tools.google.com/dlpage/gaoptout>.

YouTube

Some videos are available on <https://www.youtube.com/>, if the user wants to view them, this site will use its cookies. For further information:

<https://www.google.it/intl/it/policies/privacy>

<https://policies.google.com/technologies/cookies?hl=it>

Vimeo

Some videos are available on <https://vimeo.com/>, if the user wants to view them, this site will use its cookies. For further information:

https://vimeo.com/cookie_policy

<https://vimeo.com/privacy>

3. Personal data recipients

For data processing we may use external service providers. We have hired service providers to send the newsletter and host our website and emails. GDPR Art. 28 governs the contractual relationships with these service providers (data processor agreements) which contains the legal requirements for data protection and security. The data can be shared with the other entities belonging to the Landbell Group if the involvement of the aforementioned entities is necessary for the provision of the service requested by the users (eg evaluating the professional profile and deciding on the recruitment / collaboration, and managing the information technology). We do not intend to transfer personal data to third parties outside the European Union. In the event that data need to be transferred outside the European Union or the European Economic Area and in a country that is not subject to an adequacy decision of the European Commission, ERP ensures that the data is processed in accordance with the GDPR and that therefore they are adequately protected by the standard contractual clauses approved by the European Commission, by an appropriate certification of compliance with the Privacy Shield (agreement stipulated between the European Commission and the US Department of Commerce in order to protect the privacy of personal data of European citizens in the event of their transfer overseas) or by binding corporate rules.

4. User rights

Under GDPR Articles 15 to 21, the user may exercise the following rights related to personal data processed by us provided that the conditions described are met.

Right to be informed

The user has the right to be informed about the personal data concerning them and processed by us.

Access right

The user has the right to obtain confirmation that his data is being processed and obtain access to it, know the processing purposes, categories of data processed and the recipients or categories of recipients to whom the personal data is disclosed.

Rectification right

The user can request to rectify incorrect personal data or supplement incomplete data.

Erasure right

The user has the right to delete his data for the following reasons:

- personal data is no longer necessary for the purposes for which it was collected or processed;
 - the user withdraws the consent on which the processing is based;
 - the user opposes the processing;
 - the user's data has been processed unlawfully;
 - the data must be deleted to fulfil a legal obligation imposed by European Union or Member State regulations to which the data controller is subject;
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- personal data was collected for company services under GDPR Art. 8.

The erasure right cannot be exercised if it conflicts with the controller's legitimate interests, for example, when:

- personal data is necessary for exercising the right to freedom of expression and information.
- personal data is necessary to ascertain, exercise or defend a right in court;
- erasure is not possible due to retention obligations. If the data cannot be deleted, there may be a right to limit its processing.

Processing limitation right

The user has the right to request limitation of his data processing if:

- the user denies the correctness of data and ERP checks it;
- the processing is illegal, and the user refuses to delete the data, requesting a processing limitation instead;
- ERP no longer needs the data, but the user needs to ascertain, exercise or defend a right in court;
- the user has opposed the processing of their data, and it is unclear whether the ERP justified reasons prevail over the user's.

This is without prejudice to the right to oppose specific data processing.

Data portability right

The user has the right to receive his data processed by ERP in a structured, commonly used and electronically readable format and has the right to transmit such data to another data controller without ERP impediments. This is provided that it is consent or contract-based processing and is performed using automated procedures.

Right to oppose

The data subject has the right to oppose the processing of his data under Article 6 paragraph 1 letter

(e) - performing a task in the public interest - or (f) - pursuit of legitimate interest - for reasons deriving from a specific situation, including profiling based on these provisions.

Consent withdrawal

If personal data processing is based on consent, the user has the right to withdraw it without prejudice to the lawfulness of the processing based on the consent given before the withdrawal.

5. Standard data retention periods

Data will be deleted or destroyed when it is no longer necessary for the processing purpose under the minimisation and retention limitation principles under GDPR Art. 5 paragraph. 1. The personal data retention period varies; data relevant for tax purposes must be kept for ten years from the end of any relationship. ERP will process data for the time necessary to meet contractual and legal obligations. Different data retention periods are specified in the privacy policy published on the site.

6. Right to complain to a supervisory authority

Under GDPR Article 77, a data subject who considers that the processing of their data is violating GDPR, has the right to lodge a complaint with a supervisory authority. The supervisory authority dealing with data protection issues is the Privacy Supervisor. This is without prejudice to any other administrative or judicial remedy.

7. Data provision

The provision of data by the user is optional but necessary to use the site's services and all required data must be provided.

8. Changes to this privacy policy

CONSORZIO ERP ITALIA reserves the right to modify this privacy policy to adapt it to current circumstances. We recommend that you regularly consult this privacy policy to stay up-to-date. The present Privacy Policy has been updated on March 29, 2019.