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WWW.TARROS.IT WEBSITE PRIVACY NOTICE

In accordance with Legislative Decree 196/2003 and following amendments as well as with Article 13 of Regulation (EU) 2016/679 (hereinafter "GDPR"), this policy describes the processing of the personal data of the users who consult and use services on the website of TARROS Spa (VAT number 00910150119), with registered office at Via Privata Enel, 19216 La Spezia (SP) Italy (hereinafter "TARROS") accessible at the following address: <http://www.tarros.it/>.

This information does not apply to other sites, pages or online services accessible via hypertext links that may be published on the website but refer to resources external to the domain.

MAIN DEFINITIONS AND LEGAL REFERENCES

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;

Data subject

The natural person to whom personal data relate. In this case the data subject is the subject who uses the website (or the person authorized to use it) whose personal data are processed.

Processing

Any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

Controller

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;

Data Protection Officer (DPO)

A natural or legal person who informs and advises the controller, monitors compliance with the GDPR, provides advice as regards the data protection impact assessment (DPIA), cooperates with the supervisory authority and acts as the contact point for the supervisory authority;

Processor

A natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

Third party

A natural person who is authorized to process personal data under the direct authority of the controller or processor;

Recipient

A natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive



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personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;

Usage data

Any information collected automatically through this website or third-party services employed on this website, including: the IP address or domain names of the computers utilized by the user who connects to the Website, the URI addresses (Uniform Resource Identifier), the time of request, the method used to send the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response from the server (successful, error, etc.), the country of origin, the features of the browser and the operating system used by the visitor, the various time details of the visit (e.g. the time spent on each page) and the details about the itinerary followed within the website, with special reference to the sequence of the pages visited, to other parameters relating to the device operating system and the user's computing environment.

Website and Database

The hardware or software tool with which the user's personal data are collected.

Cookies

Small text files placed on the data subject's device.

Legal references

Legislative Decree 196/2003, as subsequently amended, Regulation (EU) 2016/679 and Legislative Decree 101/2018.

CONTROLLER

TARROS Spa, Via Privata Enel, 19126 La Spezia (SP) Italy
+39 0187 5371 Certified email: tarros@pec.it.

TYPES OF PERSONAL DATA PROCESSED

After any use of the website, personal data relating to an identified or identifiable natural person may be processed.

1) Browsing Data

During their normal operation the computer systems and software procedures which are used to operate this website acquire some personal data whose transmission is implicit in the use of Internet communication protocols.

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

This information is obtained through cookies, small portions of codes (computer files or partial data) sent by a web server to the user's Internet device (PC, smartphone, tablet).



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For more information about cookies on this website visit: http://www.tarros.it/wp-content/uploads/2019/10/GDPR_COOKIE-POLICY.pdf

The personal data collected are necessary for the following purposes:

- 1) using web services;
- 2) obtaining statistical information on the use of the website (most visited pages, number of visitors during a specific period of time or day, geographical areas of origin, etc.);
- 3) checking the correct functioning of the website and the services provided.

The browsing data shall be stored anonymously for statistical purposes.

2) Data collected from the data subject

Any personal data provided voluntarily by the user.

The section “send a *message*” includes the fields relative to the following personal data:

- 1) Name;
- 2) Email address

The section “send us your CV” includes the fields relative to the following personal data:

- 1) Name;
- 2) Surname;
- 3) Covering letter of application;

Applicants can download their CV using the application form therein provided

3) Personal data of employees

The website allows the user to find employees in the section “*THE PEOPLE - Are you looking for an employee in particular?*”. *Employees* are identified with an image, personal data, their duties and responsibilities, company email address and telephone number.

PURPOSES AND DATA RETENTION PERIOD

The personal data collected by TARROS through its website are necessary for:

- 1) having access to the contact page;
- 2) having access to the recruitment page;
- 3) compliance with legal obligations.

The provision of personal data for the aforementioned purposes is mandatory and failure to provide the required data, even partially, may make it impossible for the user to use the required services.

TARROS shall exercise its right to interrupt the provision of services in the event that the personal data disclosed by the users prove to be untrue.

The legal bases for processing under Article 6 of Regulation (EU) 2016/679 are:

- 1) As regards the personal data disclosed by the users to receive information about trading: processing is necessary for the performance of a contract to which the data subject is party, for implementation of pre-contractual measures at the data subject’s request or for the purposes of the legitimate interest of the company to provide information on its services;



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2) As regards the personal data disclosed by the applicant: processing is necessary for the performance of a contract to which the data subject is party or for the implementation of pre-contractual measures at the data subject's request;

3) As regards the personal data necessary for data processing or communications for compliance with legal obligations: processing is necessary for compliance with a legal obligation to which the controller is subject.

Personal data are processed for the time necessary to fulfil the aforementioned purposes.

PROCESSING

The personal data collected through the website are processed by the controller and authorised personnel pursuant to Regulation (EU) 2016/679 and Legislative Decree n. 196/2003 as subsequently amended in compliance with the principles of lawfulness, fairness and transparency.

Employees shall process and store, by automated means and/or manually, the personal data collected through the website and its features which can be enabled on the user's request for the time necessary to achieve the purposes for which the data have been collected or voluntarily disclosed by the user.

SPECIAL CATEGORIES OF PERSONAL DATA

Pursuant to Articles 9 and 10 of GDPR the user may disclose personal data which can be defined as "special categories of personal data" revealing "racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation" and personal data relating to criminal convictions and offences.

RECIPIENTS

The personal data are mainly processed by employees or collaborators of TARROS, according to detailed instructions as regards purposes and methods of processing. The personal data collected through www.tarros.it website may be disclosed either to service providers for technical purposes concerning information technology (web hosting providers, project managers, computer programmers, systems analysts and database administrators, etc.) or to suppliers whose activities are connected, ancillary or support to the activities of TARROS (for example recruiting agencies, trading partners and consultants). In this case, the recipients shall be appointed as processors. The full list of processors is available submitting written request to the controller.

RIGHTS OF THE DATA SUBJECT

At any time the data subject, pursuant to Articles 15 to 22 of GDPR, shall exercise the following rights:

- a) right to obtain access to the personal data from the controller, right to obtain information about the purposes of the processing, the categories of personal data concerned, the recipients or categories of recipients to whom the personal data have been or will be disclosed and, where possible, the period for which the personal data will be stored;

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- b) right to request rectification or erasure of personal data and restriction of processing;
- c) right to data portability, right to object to processing of personal data, right to object to automated decision-making, including profiling;
- d) right to withdraw his or her consent at any time without affecting the lawfulness of processing based on consent before its withdrawal;
- e) Right to lodge a complaint with a supervisory authority (garante@gdpr.it or protocollo@pec.gdpr.it).

The data subject shall exercise his or her rights submitting written request to the controller.

Last updated July 2019

TARROS SpA

Signed original copy retained at the registered office address

TARROS S.p.a.

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CENTRALINO: Tel. +39 0187 5371
P.IVA 00910150119 - Iscr. Reg. La Spezia 000000

INDIRIZZI POSTA ELETTRONICA CERTIFICATA:

TARROS: tarros@pec.it
UFFICIO CLAIMS: claim.tarros@pec.it
UFFICIO TRASPORTI: trasporti.tarros@pec.it

www.tarros.it
info@tarros.it