

## PRIVACY POLICY

This policy is provided to users (hereinafter referred to as 'data subjects') who visit the BBA ECOTECH website [www.bbaecotech.com](http://www.bbaecotech.com) in accordance with and for the purposes of the provisions for the adaptation of the Privacy Code (as amended by Legislative Decree 101/2018) to the provisions of European Regulation 2016/679 on the protection of personal data (hereinafter referred to as 'GDPR'). To access the cookie policy, [click here](#).

### Ownership of the website [www.bbaecotech.com](http://www.bbaecotech.com)

The owner of the website [www.bbaecotech.com](http://www.bbaecotech.com), which can also be accessed via its aliases or third-level domains (hereinafter referred to as 'website'), is BBA ECOTECH S.R.L.: registered office in Via Livatino 15/17/19 - 20066 Melzo (MI) – Tax Code and VAT No. 09667490966.

### Terms and conditions of use

Use of this website is subject to your acknowledgement, acceptance and compliance with the terms and conditions set out below. If you do not accept these terms and conditions, please do not use this website or download any material from it.

### Limits on web use and copyright

All material and content on the website are the property of BBA ECOTECH and are protected by intellectual property rights, in accordance with current copyright legislation. The documentation, images, content, software and any other element of the website are the exclusive property of BBA ECOTECH. Access to the website does not give the user the right to appropriate, reproduce, modify, distribute or republish, in any form, in whole or in part, the information contained therein. This is without prejudice to the possibility of storing and printing such content for personal use only. The trademarks, logos and distinctive signs used on the website are the property of BBA ECOTECH and may not be used without the prior written consent of BBA ECOTECH. Additional trademarks and logos of third parties used on the website are the exclusive property of their respective owners. Any use or reproduction in any form of the said trademarks and logos is prohibited.

### Limitation of liability

The contents of this website are published for informational purposes only regarding the activities and products of BBA ECOTECH; they do not constitute and cannot be considered an offer to sell, subscribe or solicit of any kind. Although this website has been created with the utmost care and attention, BBA ECOTECH makes no warranty as to the completeness and accuracy of the information or for any material errors or omissions in the data contained therein. BBA ECOTECH declines all responsibility for any loss or damage due to or connected with the use of the website, and also accepts no responsibility for any temporary inaccessibility of the website or in the event of outdated information. BBA ECOTECH reserves the right to intervene at any time and without notice to make changes, corrections, updates and improvements to the structure of the website and to the information/documents contained therein.

### Links

BBA ECOTECH accepts no responsibility for information and/or documents published by third parties on websites with which it has an interactive link (hyperlink) or for the technical and operational methods adopted by such websites, with particular reference to IT security and privacy protection. Users who decide to visit a website linked to this website do so at their own risk, assuming the responsibility of taking all necessary precautions. In any case, the existence of the link does not imply any form of sponsorship/authorisation by BBA ECOTECH. Therefore, under no circumstances shall BBA ECOTECH be held liable for any direct and/or indirect damage caused by the use and/or browsing of websites linked to this website.

### Privacy Policy Website

This document describes how the website [www.bbaecotech.com](http://www.bbaecotech.com) is managed with regard to the processing of personal data of those who interact with the services provided: the information is provided pursuant to Article 13 of European Regulation (EU) 2016/679 (GDPR) only for the website in question and not for other websites that may be consulted by the user via links, for which BBA ECOTECH is in no way responsible. In order to offer the personalised and non-personalised services provided on its website, BBA ECOTECH S.R.L., as Data Controller, processes the personal data necessary for the provision of such services and guarantees, within the scope of the regulatory provisions, that the processing of personal data is carried out in compliance with fundamental rights and freedoms, as well as the dignity of the data subject, with particular reference to confidentiality, personal identity, and the right to and protection of personal data itself. Specific additional and contextual information is provided on the pages of the website dedicated to on-demand services that require forms for data collection.

### Types of processed data

Personal data may be collected automatically during navigation and use of the website and the services provided therein, or may be entered voluntarily by the user. The personal data collected by the Data Controller independently or through third parties may include, by way of example and without limitation: IP address, date and time of visit, type of browser and device used, referring and exit web pages, etc.). The personal data transmitted by the user may include, by way of example and without limitation: identification data (name, city, date of birth, personal details, i.e. name and surname of natural persons, etc.) and contact details (address or other personal identification details, such as telephone number, email address, etc.) or even registration data used to create and activate your account (access to a reserved area).

#### a) Browsing data and other data

During normal operation, the IT systems and software procedures used to operate this website acquire some personal data whose transmission is implicit in the use of Internet communication protocols. This information is not collected to be associated with identified individuals, but by its very nature could, through processing and association with data held by third parties, allow users to be identified. This category of data includes IP addresses or domain names of computers and terminals used by users, URI/URL (Uniform Resource Identifier/Locator) addresses of 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 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. etc.) and other parameters relating to the user's operating system and IT environment. These data, necessary for the use of web services, are processed for the purpose of:

- check the proper functioning of the website and the services offered;
- obtain statistical information on the use of services (most visited pages, number of visitors per time slot or per day, geographical areas of origin, etc.).

Browsing data is retained for a maximum period specified in the cookie policy (without prejudice to any need for the judicial authorities to investigate crimes). The use of cookies - or other tracking tools - by this website or by the owners of any third-party services used by it, unless otherwise specified, is for the purpose of identifying the user and recording their preferences for purposes strictly related to the provision of the service requested by the user.

#### b) Personal data provided voluntarily by the user

Personal data may be entered voluntarily by the user, in order to make requests or to use the services provided by the website, by filling in forms or sending emails. The optional, explicit and voluntary sending of messages to contact addresses, messages sent by users to institutional profiles/pages on social media (where this option is available), as well as the completion and submission of forms on the website, entail the acquisition of the sender's contact details, which are necessary to respond to requests, as well as all personal data included in the communications. Specific information is provided on the pages containing the forms designed for the provision of certain services. The user assumes responsibility for any personal data of third parties that may be published or shared through this website and guarantees that they have the right to communicate or disseminate such data, releasing the Data Controller from any liability towards third parties.

#### c) Cookies and other tracking systems

Cookies are not used for user profiling. The only processing carried out concerns the production of statistics, with pseudonymised data, on navigation on the website [www.bbaecotech.com](http://www.bbaecotech.com). The configuration adopted, in order to exclude the processing of identifying data, may collect the following information:

- IP address, which is masked by clearing certain bytes;
- operating system in use;
- type of browser;
- type of device (PC, smartphone, etc.).

Technical session and/or persistent cookies are used, strictly limited to what is necessary for the safe and efficient navigation of the website.

#### Purpose of processing and purpose of cookies

The cookies used on the website are intended to perform computer authentication, session monitoring and storage of technical information regarding the activities of users who access a web page or website. In this context, some operations on the website cannot be performed without the use of cookies, which are therefore technically necessary in such cases. These cookies, known as technical cookies, are useful because they can facilitate faster navigation and more effective use of the website (for example, they facilitate certain procedures when making online purchases, when authenticating to a restricted access area, or when a website automatically recognises the language you intend to use). The website [www.bbaecotech.com](http://www.bbaecotech.com) uses cookies to make the services of the website easier, faster and more efficient for users who view the web pages. Users who access the website will receive very small amounts of information on their devices, whether computers or mobile devices, in the form of small text files, known as 'cookies', stored in the directories used by their browser. The cookies used allow:

- store browsing preferences;
- Avoid re-entering the same information multiple times;
- analyse the use of the services and content provided by the website in order to optimise the browsing experience.

#### Legal basis

The personal data of users who visit the web pages of the site [www.bbaecotech.com](http://www.bbaecotech.com) may be acquired through the use of cookies, for the purposes described above. The use of technical cookies consists of processing carried out in the legitimate interest of the Data Controller; the lawfulness of processing related to the use of analytical or third-party cookies, on the other hand, is based on the provision of distinct and unequivocal consent by the user (upon first accessing the website). The personal data of users who access our website to use the services provided therein are provided by the interested parties on a spontaneous and voluntary basis. In this context, the legal basis for the processing consists of the following conditions:

- performance of a contract to which the data subject is party or performance of pre-contractual measures taken at the request of the data subject (information and commercial offers);
- pursuit of the legitimate interests of the data controller (promotion of commercial activities to customers or potential customers who explicitly request it);
- Consent given through a statement or unequivocal positive action (for promotional and direct marketing purposes).

#### Mandatory or optional nature of data provision

The personal data collected by this website, either independently or through third parties, consists of browsing data and personal data freely provided by the user. Full details on each type of data collected are provided in the dedicated sections of this privacy policy or through specific information texts displayed on the data collection forms. The user may refuse to provide the Data Controller with their browsing data. To do this, you must disable cookies by following the instructions provided by your browser. Disabling cookies may worsen your browsing experience and may limit and/or prevent the use of all or part of the website's features. With regard to the optional provision of data, further information on the cookies used on the website is provided in the 'cookie policy' document, which can be accessed both from this complete policy and from the summary policy contained in the banner published on the website. The provision of data on collection forms, if present on this website, is optional, except for those indicated as mandatory in order to allow the user to access the services offered. Failure by the user to provide certain personal data may prevent them from using all the features and services provided by this website or from receiving a response to their requests. The processing of data provided voluntarily for the purposes described above is carried out without consent, as it is strictly necessary for the performance of the processing operations and the activation of the services requested by the user.

#### Processing methods

Personal data will be processed using electronic tools, including automated methods, in accordance with the principles of lawfulness, necessity and relevance, adopting safeguards aimed at identifying adequate security measures at every stage of the processing procedure. Personal data will be pseudonymised or identifying data will be removed (anonymisation) once the above purposes have ceased and, in any case, upon expiry of the retention period indicated in the following paragraph. The Data Controller does not carry out processing consisting of automated decision-making processes (such as profiling) on the data of users or those who interact with this website. IT technicians (including outsourced technicians) who oversee the operation of the IT system may accidentally access the data.

#### Data retention

The Data Controller retains the data for the time necessary to obtain anonymous statistical information on the use of the website and to check its correct functioning. Personal data will be retained for the period necessary to pursue the aforementioned purposes; in particular, personal data collected for purposes related to the legitimate interest of the Data Controller will be processed and retained until such interest is satisfied, except for a further retention period imposed by law or by explicit request from the Authority. When the processing is based on the consent of the data subject, the Data Controller may retain personal data for a longer period, until such consent is revoked (where requested by the data subject). Furthermore, in the event of consent being given for marketing purposes, the data will be retained, without prejudice to the possibility of revoking consent, for a period of time not exceeding that necessary to achieve the purposes pursued (twenty-four months), after which the data will be deleted or made anonymous and processed solely for statistical analysis (without prejudice to a further retention period imposed by law or by explicit request from the Authority).

#### Recipients of the data

Personal data or any personally identifiable information will not be disclosed, i.e. it will not be made known to unspecified parties in any form whatsoever, including by making it available for consultation, but may be communicated, to the extent strictly necessary, to those who act as suppliers for the provision of services related to the management of the website (web design & hosting) and for the consequent management of the contractual relationship and related administrative obligations, as well as to those who provide IT services or commercial electronic communications services. The Data Controller takes appropriate security measures to prevent unauthorised access, disclosure, modification or destruction of personal data. In addition to the Data Controller, in some cases, other parties involved in the organisation of this website (sales/marketing staff, system administrators, etc.) or external parties (technical service providers, hosting providers, IT service companies, companies specialising in the management, development and maintenance of websites, etc.) who are used exclusively for the provision of services related to the purpose pursued, which our organisation, in order to ensure greater protection, has from time to time appointed as Data Processors (Art. 28 of the GDPR) for the processing operations carried out by them. The updated list of Data Processors can always be requested from the Data Controller.

#### Data transfer

No transfer of personal data to a third country or international organisation (Art. 13, paragraph 1, letter f) of the GDPR) outside the European Union (or the European Economic Area) is envisaged. However, the Data Controller reserves the right to use cloud services, in which case the service providers will be chosen from among those companies able to provide specific guarantees following a regulatory framework recognised by an adequacy decision of the European Commission (such as that of 10 July 2023, which officially

approved the 'EU-US Data Privacy Framework' or the new agreement on data transfers to the United States) or, in the absence thereof, suitable contractual or agreed guarantees (including binding corporate rules (BCRs) and standard contractual clauses (SCCs)). The Microsoft 365 Business solution, which includes the email service that uses the Office 365 software platform, belongs to Microsoft Ireland Operations Limited (One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, Ireland), a company based within the European Union (EU).

#### Rights of the data subject

The data subject to whom the personal data refer has the right to exercise their rights at any time (pursuant to Articles 15-22 of the GDPR) in order to obtain:

- confirmation as to whether or not personal data concerning him/her are being processed, as well as access to the data and the following information (purposes of the processing, categories of personal data, recipients and/or categories of recipients to whom the data have been and/or will be disclosed, storage period);
- the rectification of inaccurate personal data concerning him/her and/or the integration of incomplete personal data, including by providing a supplementary statement;
- the deletion of personal data or the restriction of the processing of personal data (as a means of responding to unlawful or incorrect processing) in the cases provided for by current legislation;
- opposition to the processing (so-called 'opt-out') of personal data (as an expression of the will to cease a specific data processing) in the cases provided for by current legislation (it remains understood that this right does not exist where the legitimacy of the processing is based on consent, since in this case the right of revocation prevails); this may be extended to the processing of one's data for purposes related to marketing activities carried out by automated means of contact or through traditional means, and may be exercised in whole or in part (for example, only to communications by e-mail or telephone, or by opposing only the sending of promotional communications carried out by automated means, etc.) or to processing consisting of automated decision-making processes (such as profiling, insofar as it is connected to direct marketing purposes);
- the portability of data relating to the data subject and provided by the data subject, in particular for the purpose of requesting the data controller to provide the personal data concerning him/her and/or requesting the data controller to transmit his/her data directly to another data controller (it being understood that this right applies only if the processing is based on a contract or consent and is carried out by electronic means) in the cases provided for by current legislation.

With regard to the exercise of their rights, data subjects may submit their requests by sending a specific communication by post to the Data Controller (at the above address) or by sending an email to [segreteria@bbaecotech.com](mailto:segreteria@bbaecotech.com), specifying the subject of the request and the right they intend to legitimately exercise.

#### Right to complain

Interested parties who believe that the processing of personal data relating to them violates the provisions of the Regulation have the right to lodge a complaint with the competent supervisory authority (Personal Data Protection Authority) in accordance with the procedures set out on the website [www.garanteprivacy.it](http://www.garanteprivacy.it) (pursuant to Article 77) or to take appropriate legal action pursuant to Article 79 of the Regulation itself (GDPR).

#### Applicable law and jurisdiction

These terms and conditions are governed by Italian law. Any dispute arising from the interpretation, application or enforcement of these terms and conditions shall be referred to the exclusive jurisdiction of the competent court.