

## ORTEA SpA

Via dei Chiosi, 21 | 20873 Cavenago di Brianza MB | ITALY

Phone +39 02 95 917 800 | Email: [ortea@ortea.com](mailto:ortea@ortea.com) | Web: [www.orteanext.com](http://www.orteanext.com)

### PRIVACY POLICY – WEB GENERAL - Information notice pursuant to Art. 13 of the Regulation (EU) 2016/679 (“GDPR”)

According to Regulation (EU) 2016/679 (General Data Protection Regulation) we provide you the due information concerning the processing of collected personal data. This notice is not to be considered valid for other websites attainable through links and data processor shall not be held responsible for third parties web pages.

This notice is provided pursuant to art. 13 of the Regulation (EU) 2016/679 (General Data Protection Regulation) and according to the provisions of the Directive 2002/58/CE, as amended by Directive 2009/136/CE on Cookies, as well as according to the Provision of the Data Protection Authority dated 08.05.2014 on cookies.

#### PERSONAL DATA WE MAY COLLECT AND PROCESS

##### Personal data

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

##### Navigation data

IP addresses, domain name, URI/URL addresses, time and method of the request, response code from server and a few information regarding the user agent (OS version, resolution, device type).

##### Voluntarily provided data

The optional, explicit and voluntary transmission of messages to contact addresses or forms, entails the subsequent acquisition of sender's address; the latter, along with any other personal information provided, will be necessary for us to reply.

##### Social media

For more information regarding the processing of personal data carried out by any Social Media platforms deployed on this website, please refer to their respective privacy policies. The Data Controller processes the personal data through the pages of the dedicated Social Media platforms, to manage interactions with users (comments, public posts, etc.) and in compliance with current legislation.

##### Specific privacy statement

Specific privacy statement may be furnished with regards to specific processing or services offered by the website.

COOKIES: More information available in the specific statement available in the website footer or through the following link <https://www.orteanext.com/contacts/cookie-policy/>

#### DATA CONTROLLER

Pursuant to art. 4 and 24 of the Reg. (EU) 2016/679, is ORTEA SPA – with registered office in Milano (MI) Viale Majno n. 10, represented by the legal representative pro tempore.

PURPOSE OF PROCESSING		LEGAL BASIS	DATA RETENTION	DATA CONFERRAL
A)	<b>Website browsing</b> Activities strictly related to site operations and to platform browsing service provision. The data required to avail yourself of this website, will be processed as well in order to: <ul style="list-style-type: none"> <li>Gather statistical information (most viewed pages, number of visitors, timeline visits, geographical source of visit)</li> <li>Monitor the status of services</li> </ul>	<b>Legitimate interest   Data subject rights</b> <b>Art. 6 lett. f)</b> and recital 47 GDPR: the processing is necessary for pursuing the legitimate interest of data controller or third parties'	Single browsing session and up to 7 days after (except from any requests by the Judicial Authority for crime prevention needs)	<b>Necessary</b> in order to guarantee the navigation
B)	<b>Website Analytics</b> By means of cookies and similar technologies More information available in the cookie policy	Cookies other than technical ones (or similar) require users' consent in order to be deployed (art. 6.a GDPR) Whether required, the consent will be requested by means of our cookie policy and its banner	More information available in the cookie policy	More information available in the cookie policy
C)	<b>Contact or information request</b> By means of phone calls, contact forms, Whatsapp	<b>Legitimate interest   Data subject rights</b> <b>Art. 6 lett.f)</b> and <b>recital 47 GDPR</b> : the processing is necessary for pursuing the legitimate interest of data controller or third parties'	1 year	<b>Necessary</b> for the legitimate interest of data controller with due regard to user's rights and fundamental freedoms
D)	<b>Direct marketing</b> , for the sending of newsletters and/or advertising or direct sales materials, or for the carrying out of market research, commercial and promotional communications, newsletters, through automated means (email, SMS).	<b>Consent</b> to the processing of personal data <b>Article 6(1)(a) — (recitals 42, 43) GDPR</b>	Until the data subject objects (opt-out)	Providing the data is optional. Failure to provide the required data will result in the inability to receive direct marketing communications via email (soft-spam).
E)	<b>Direct marketing, automated "soft-spam" via email</b> : The data controller will use the email address provided by the data subject in the context of the sale of a product or service, for the purposes of direct sales of their own products or services, without requiring the data subject's consent, for promotional and commercial communications, as well as newsletters on services similar to those sold. The data subject, duly informed, does not object to this use, either initially or in subsequent communications. The data subject will be informed at the time of collection and when each communication is sent for the purposes stated above, about their right to object to the processing at any time, easily and free of charge	The processing is necessary for the pursuit of the legitimate interest of the data controller or a third party, provided that the interests or rights and fundamental freedoms of the data subject, which require the protection of personal data, do not override (Recitals 47-50). Article 6(1)(f) GDPR and Article 130, paragraph 4 of Legislative Decree 196/2003.	5 years from the closure of the request, unless there are legal disputes	The provision of personal data is mandatory because it is necessary to comply with legal requirements

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PURPOSE OF PROCESSING		LEGAL BASIS	DATA RETENTION	DATA CONFERRAL
F)	<b>Management of interested subjects' requests</b> pursuant to art. 15 and following (GDPR)	<b>Legal obligation</b> <b>Art. 6.1.c) GDPR</b> processing is necessary for compliance with a legal obligation the controller is subject to;	5 years after its closure, except from controversy	<b>Necessary:</b> The provision of personal data is mandatory in order to execute legal obligations
G)	<b>Signing-In to Reserved Areas:</b> In order to create Users account and benefit from the services provided by the Data Controller (get access to the manuals area)	<b>Contract</b> <b>Art. 6(1)(b) GDPR:</b> processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;	10 years or otherwise stated by Law	<b>Necessary:</b> The provision of personal data is mandatory or optional depending on specific form; where mandatory and in case of lack the Data Controller will not be able to reply or guarantee his services.

## RECIPIENTS OR CATEGORIES OF RECIPIENTS OF PERSONAL DATA

Personal data provided by you may be communicated to recipients who will act as Processors (art. 28 of the Reg. EU 2016/679) and/or persons acting under the authority of the Controller and the Processor (art.29 of the Reg. UE 2016/679) for the purposes pointed ahead. Precisely, your data may be disclosed to recipients being part of the following categories:

- Subjects providing services for the management of the information system used by **ORTEA SPA** and telecommunication networks;
- Studies or companies in the context of assistance and consultancy relationships;
- Subjects providing services related to the management of the above mentioned purposes (communication, brochure printing, fliers, websites, videos);
- Head-hunters agencies
- Commercial partners, upon consent;
- Competent authorities for compliance with legal obligations and / or provisions of public bodies, upon request;

You can request a complete listing of processors writing to the abovementioned addresses.

## DATA TRANSFER TO A THIRD COUNTRY AND/OR TO INTERNATIONAL ORGANISATION

Personal data provided won't be transferred to a third Country outside the SEE.

Moreover, all the data will be hosted and retained in Italy; all the third parties to whom data may be disclosed, do have registered office in Italy

## AUTOMATED-MEAN PROCESSINGS

Personal data will be manually and electronically processed, as well as by automated-mean activity. It is specified that fully automated decision-making processes are not carried out.

## DATA SUBJECT'S RIGHTS

You may freely exercise your rights at any time under Reg. EU 2016/679 –GDPR, Sections15, 16, 17, 18, 19, 20, 21 by contacting the Data Controller - ORTEA SPA in person or its legal representative sending an email to [privacy@ortea.com](mailto:privacy@ortea.com).

You have the right, at any time, to obtain confirmation from the Data Controller as to whether or not personal data concerning you are being processed, request their rectification or erasure, to oppose to personal data processing (also to profiling) without prejudice to the lawfulness of processing, to obtain the restriction of processing.

Without prejudice to any other administrative or judicial remedy, in case you consider your data processing in contrast with Reg. UE 2016/679, pursuant to article 15 lett. f) of Reg. UE 2016/679, you have the right to lodge a complaint with a supervisory authority ([www.garanteprivacy.it](http://www.garanteprivacy.it)) and, pursuant to article 6 paragraph no. 1, lett. a) and article 9, paragraph no. 2, lett. a), you have the right to revoke your expressed consent at any time.

Exercising your right to data portability, the Data Controller may provide your personal data in a structured, commonly used and machine-readable format subject to the provisions set forth in paragraphs 3 and 4 of art. 20 of Regulation EU 2016/679.

Date of review: September 22<sup>nd</sup>, 2025

The Data processor retains the right to modify, update, add or remove some parts of this informative at any time.

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