



ITAflon[®]
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**PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA
WEBSITE USERS**

Pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 (GDPR)

INTRODUCTION

ITAFILON S.r.l. regards the protection of personal data and the confidentiality of information as an integral part of the principles governing its relationships with customers, partners, business contacts and users of its digital services.

In accordance with Regulation (EU) 2016/679 (the "GDPR"), Italian Legislative Decree No. 196/2003, as subsequently amended and supplemented, and the applicable personal data protection legislation, ITAFILON S.r.l. adopts organisational and technical measures designed to ensure that personal data are processed in accordance with the principles of lawfulness, fairness, transparency, purpose limitation, data minimisation, accuracy, storage limitation, integrity and confidentiality.

This notice describes how the personal data of users who visit and use ITAFILON S.r.l.'s website and interact with the services available through it are processed. It applies only to ITAFILON S.r.l.'s website and does not cover third-party websites, pages or online services that may be reached through links on the website.

1. DATA CONTROLLER

ITAFILON S.r.l.
Via Giacomo Puccini no. 5
24060 San Paolo d'Argon (BG), Italy
Tax Code and VAT No. 03942330162
REA BG - 442706
Certified email (PEC): itaflon@progettostudio.legalmail.it
Privacy contact: privacy@itaflon.com

2. CATEGORIES OF PERSONAL DATA PROCESSED

Browsing data

The IT systems and software procedures used to operate the website may, during their normal operation, collect certain data whose transmission is inherent in the use of Internet communication protocols. These may include IP addresses, identifiers of the devices used, browser and operating system characteristics, addresses of requested resources, time of the request and other technical information relating to browsing. This information is processed mainly to ensure the proper operation, security and usability of the website.

Data provided through the contact form. Use of the contact form entails the processing of data voluntarily provided by the user, such as name, email address and any further information included in the message. Users are asked not to include personal data that are unnecessary for their request. Data voluntarily provided by the user The optional and voluntary sending of messages to the contact details published on the website entails the collection of the sender's contact details and any other personal data contained in the message, to the extent necessary to reply to the request.

3. PURPOSES OF PROCESSING AND LEGAL BASES

Purpose	Description	Legal basis
A. Browsing and website operation	To enable access, browsing, proper operation and use of the website's functions.	Article 6(1)(f) GDPR - the Controller's legitimate interest in ensuring the operation and proper use of its website.
B. Website and system security	To prevent and detect anomalies, unlawful use, unauthorised access attempts and other events that may compromise systems, data or website security.	Article 6(1)(f) GDPR - the Controller's legitimate interest in the security of its IT systems, information and website.
C. Contact and information requests	To manage and respond to requests sent through the contact form, email or other contact details published on the website.	Article 6(1)(b) GDPR where the request concerns pre-contractual measures taken at the data subject's request; otherwise Article 6(1)(f) GDPR, the Controller's legitimate interest in handling and responding to requests.

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D. Commercial and pre-contractual enquiries	To handle product enquiries, quotations, commercial information and other activities preliminary to a possible business relationship.	Article 6(1)(b) GDPR where directly applicable; otherwise Article 6(1)(f) GDPR, legitimate interest in managing business relationships.
E. Legal obligations and protection of rights	To comply with applicable legal obligations and, where necessary, establish, exercise or defend the Controller's rights.	Article 6(1)(c) GDPR - compliance with a legal obligation; where applicable, Article 6(1)(f) GDPR - legitimate interest in protecting the Controller's rights.

4. NATURE OF THE PROVISION OF DATA

Providing data through the contact form is optional. However, failure to provide information marked as necessary may prevent ITAFILON S.r.l. from receiving, handling or responding to the user's request. Data strictly necessary for the technical operation and security of the website are processed automatically while browsing.

5. CONTACT FORM

Data provided through the contact form are used solely to receive, manage and respond to the user's request and for any directly related pre-contractual activities. Processing necessary to respond does not require consent, as it is based on the legal bases set out in section 3. Any separate use of contact details for additional purposes, such as promotional or marketing communications, will take place only in compliance with the conditions and legal bases laid down by applicable law.

6. COOKIES AND OTHER TRACKING TECHNOLOGIES

ITAFILON S.r.l.'s website may use first-party or third-party cookies and other tracking technologies to enable the proper operation and use of the website and, where applicable, for statistical, analytical or other purposes. They are used in accordance with applicable law and, where required, only after the user has given consent.

Detailed and up-to-date information on the cookies and tracking technologies actually used, their purposes and duration, the third parties involved, and how users may give, change or withdraw their preferences is provided in the extended Cookie Policy available through the relevant link on the website. The Cookie Policy and the preference management system are the specific, current reference for cookies and other tracking technologies used on the website.

7. PROCESSING METHODS AND SECURITY MEASURES

Personal data are processed using IT and telematic tools in ways strictly connected with the purposes set out in this notice. ITAFILON S.r.l. adopts technical and organisational measures appropriate to the risk, designed to ensure an appropriate level of security and protect personal data against unauthorised access, loss, destruction, disclosure or unauthorised alteration. Access is limited to authorised persons according to their duties and operational needs.

8. AUTHORISED PERSONS RECIPIENTS AND PROCESSORS

Personal data may be processed by specifically authorised and instructed ITAFILON S.r.l. personnel, within the limits of their respective duties. To the extent necessary for the purposes described, data may also be processed by or disclosed to:

hosting service providers;

IT and systems service providers;

parties responsible for the design, operation, support and maintenance of the website;

providers of technology services used through the website;

consultants and professional advisers, where necessary;

public or judicial authorities and other parties to whom disclosure is required by law.

Parties that process personal data on behalf of ITAFILON S.r.l. are appointed as processors under Article 28 GDPR where the relevant requirements are met. Personal data will not be disseminated.

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9. TRANSFERS OF DATA TO THIRD COUNTRIES

Where the use of certain technology services or providers entails the transfer of personal data to countries outside the European Economic Area, ITAFLON S.r.l. ensures that the transfer is carried out in accordance with Articles 44 et seq. GDPR, on the basis of a European Commission adequacy decision or other safeguards provided for by applicable law. For transfers associated with third-party cookies and tracking technologies, please refer to the extended Cookie Policy.

10. RETENTION PERIOD

Personal data are retained for no longer than necessary for the purposes for which they were collected. In particular: data relating to contact and information requests are retained for the time needed to handle and conclude the request and subsequently for any period needed to protect the Controller's rights; if a request leads to a business or contractual relationship, the data will be processed and retained for the periods applicable to that relationship; technical and security data are retained only for the period strictly necessary for website operation, security and protection of systems, in accordance with the technical settings adopted; retention periods for cookies and other tracking technologies are set out in the extended Cookie Policy.

11. LINKS TO THIRD PARTY WEBSITES AND SERVICES

The website may contain links to websites, platforms or services operated by third parties. ITAFLON S.r.l. does not determine the purposes and means of processing independently carried out by those parties through their websites or services. Users should therefore read the privacy notices issued by the relevant controllers before using those services.

12. WHISTLEBLOWING

ITAFLON S.r.l.'s website includes a section dedicated to its whistleblowing reporting system, through which users can access the platform provided for submitting and managing reports. Personal data processed in connection with whistleblowing reports are governed by a specific privacy notice made available within the relevant procedure and/or platform. This Privacy Notice does not replace that specific notice.

13. DATA SUBJECT RIGHTS

In the cases and within the limits laid down in Articles 15 et seq. GDPR, data subjects may: obtain confirmation as to whether personal data concerning them are being processed and access those data; have inaccurate data rectified and incomplete data completed; request erasure where the relevant conditions are met; request restriction of processing; exercise the right to data portability in the cases provided for by Article 20 GDPR; object, on grounds relating to their particular situation, to processing based on the Controller's legitimate interests; withdraw consent at any time where processing is based on consent, without affecting the lawfulness of processing carried out before withdrawal. Rights may be exercised by contacting ITAFLON S.r.l. using the details set out in section 1. Data subjects also have the right to lodge a complaint with the Italian Data Protection Authority (Garante per la protezione dei dati personali) if they believe that their personal data are processed in breach of applicable law.

14. UPDATES TO THIS NOTICE

This notice was last updated on 11 August 2026 - Rev. 01. ITAFLON S.r.l. may update or amend it if the methods or purposes of processing, the services and systems used, or applicable law change. Material changes will be brought to the attention of data subjects by means appropriate and proportionate to the nature of the changes.

Issue date: 11 August 2026

ITAFLON S.r.l.

The Data Controller

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