



## PRIVACY POLICY of [www.brawo.com](http://www.brawo.com)

(Updated on 3 September 2021)

### Information Notice under art. 13 of Regulation (EU) 679/2016 (GDPR)

Dear User,

**Brawo S.p.A.** (hereinafter also referred to as “*the Data Controller*” and “*the Company*”) pays great attention to ensuring the privacy of its Users. This page describes the procedures used to manage its website [www.brawo.com](http://www.brawo.com) (hereinafter “*Website*”) with regard to the processing and protection of the personal data of such users. It is an Information Notice provided in accordance with the requirements of Regulation (EU) 679/2016 “*Regulation on the protection of natural persons with regard to the processing of personal data and on the free movement of such data*” (hereinafter EU Reg.) to all those browsing the Website. Browsing this Website, and registration with the same, may infer the recording, use, erasure and, more generally, the processing of the personal data of identified or identifiable users. The Information Notice only covers the Website and does not apply to any other websites which users may consult by clicking links on the Website pages, for which the Data Controller is under no circumstances responsible. Please also note that the Website contains sections dedicated to companies other than Brawo S.p.A. (i.e. “*Brawo USA-Contacts*”, “*Brawo Lofthouse-Contacts*”, “*Emmebi-Contacts*”, “*Work with Brawo USA*”, “*Work with Brawo Lofthouse*”) in relation to which the Company assumes no liability whatsoever: any data entered by Users in the abovementioned sections shall not be processed by Brawo S.p.A.

#### 1. Data Controller

**The Data Controller** for the personal data provided by the Users is **Brawo S.p.A.** with registered office in 25050 Pian Camuno (Brescia), Italy, Via XXV Aprile 36, Tax Code and VAT no. 00566320982. Tel. 0364/591556 - Fax 0364/599073.

#### 2. Type of data collected

##### a) *Browsing Data*

The data processing systems and software procedures used by this Website acquire some personal data, the collection of which is implicit when using Internet communication protocols. This refers to information which is not collected to be associated with identified data subjects but, due to their nature, could permit the identification of the Users, if they are processed and associated with data held by third parties. This type of data includes IP addresses or computer domain names used by the Users to connect to the Website, the URI (Uniform Resource Identifier) addresses of the requested resources, the time of request, the method used to make the request to the server, the size of the file received in reply, numerical code indicating the status of the reply given by the server (successful, error etc.) and other parameters of the operating system and the environment used by the User.

##### b) *Data provided spontaneously by the User (art. 4 (1) of the EU Reg.).*

No provision of User personal data is required to browse the Website. However, the entry of data in the sections “*Brawo S.p.A. - Contacts*” and “*Work with Brawo S.p.A.*” will lead to collection of the sender’s e-mail address and of user-entered data, required in order to respond to the request. In any case, specific information is given or displayed in the individual sections of the Website. Users are asked not to send names or other personal data of third parties in their requests for services or inquiries, unless strictly necessary.



c) *Cookies*

Please read our [Cookie Policy](#) for further information on the use of cookies on our Website.

### 3. Purpose and legal basis of the processing

The legal basis of the processing of browsing data (point 2 letter a) is to pursue the legitimate interests of the Data Controller regarding the management of the Website and are used to:

- allow access and browsing of the Website
- collect data and information in an aggregated and anonymous manner to verify the correct functioning of the Website;
- collect data and information for the purpose of protecting the security of the Website (antispam filters, firewalls, virus detectors) and its users;
- collect anonymous statistics on the use of the Website.

In the event of unlawful IT offences committed to the detriment of the Website, browsing data may also be used to ascertain responsibility.

With reference to the purpose of processing data entered in the form "Brawo S.p.A. - Contacts" and in the form "Work with Brawo S.p.A.", please refer to the information notice provided in the respective sections of the Website.

The collected data shall not be transferred to third-parties without obtaining the specific and unequivocal prior consent of the Data Subject.

### 4. Data processing methods

User personal data shall be processed lawfully, fairly and in a transparent manner using manual and/or electronic means, with organisational systems correlated to the purpose of the processing and in order to guarantee the security, integrity and confidentiality of the data and the rights of the data subject, in accordance with the provisions of Reg. (EU) 679/2016 (making particular reference to arts. 24, 32 e 35).

Security measures of a technical and organisational nature have been adopted and put in place to protect the data against destruction or accidental loss and against unauthorized access or disclosure.

The processing operations may be carried out with or without the use of electronic or automated tools.

### 5. Disclosure of personal data

In addition to the Data Controller, in some cases other internal Brawo S.p.A. employees (administration, sales, legal personnel, system administrators) may also access the data, and be granted processing authorisation for the purpose of such processing.

Collected data may also be disclosed to independent subjects (e.g. third-party technical service providers, hosting providers, IT and software firms), who are designated as Data Processors, under art. 28 Reg. EU and operate on behalf of, and according to the instructions of Brawo S.p.A., exclusively for activities strictly related to the aforementioned purposes (e.g. to guarantee the operation of Internet services and the management of the IT and computerised systems).

A complete and updated list of such employees can be required using the contact details provided below.

### 6. Data retention period

Browsing data (point 2, letter a) shall be retained, in accordance with the provisions of the applicable regulations in force for no longer than is strictly necessary for the purposes for which the data were collected.



With reference to the retention period of data entered in the form "*Brawo S.p.A. - Contacts*" and in the form "*Work with Brawo S.p.A.*", please refer to the information notice provided in the relevant sections of the Website.

#### **7. Consequences of failure to provide personal data**

Browsing data collected for the scope and purpose of this processing (point 2, letter a) are mandatory as strictly functional to the computerised management of the Website.

With reference to the consequences of failure to provide data in the form "*Brawo S.p.A. - Contacts*" and in the form "*Work with Brawo S.p.A.*", please refer to the information notice provided in the relevant sections of the Website.

#### **8. Data storage location**

Personal data shall be stored at the Data Controller's operating headquarters and, in any case, within the European Union.

#### **9. Rights of the Data Subject**

Users to whom the personal data refer shall have the right to request and obtain, at any time, from the Data Controller, access to (art. 15 EU Reg.), rectification (art. 16 EU Reg.) or deletion (so called right to be forgotten) (art. 17 EU Reg.) of their personal data. Users also have the right to limit the processing of their personal data (art. 18 EU Reg.), the right to data portability (art. 20 EU Reg.) as well as the right to object, on legitimate grounds, to their processing (art. 21 EU Reg.). In any event, Users shall have the right to lodge a complaint with a Supervisory Authority, as provided for by art. 77 EU Reg. or to report any violations to the competent judicial authorities, in accordance with art. 79 of EU Reg., should they believe that the processing of personal data referred to them has been carried out in violation of the provisions of the EU Reg.

#### **10. Methods for exercising the rights**

Users can exercise their rights at any time by sending:

- an e-mail to the address [privacy@brawo.it](mailto:privacy@brawo.it);
- a fax to number 0364/599073;
- a registered mail with advice of receipt to the following address: **Brawo S.p.A.** with registered office in Via XXV Aprile, 36 – 25050 Pian Camuno (Brescia) Italy.

#### **11. Amendments to this Information Notice**

**Brawo S.p.A.** reserves the right to amend this Information Notice. The date indicated at the beginning of the Information Notice refers to the date of issue of the most recent version. A notice on the Website, or via other means, will be provided if any substantial changes are made to give all Users the chance to verify the amendments before they become effective.