

Privacy and cookie policy

Version 1.0

Iprona S.p.A., headquartered in 39011 Lana (BZ), Italy, via dell'Industria 1/6, (hereinafter "**Iprona**") has always implemented measures to guarantee the privacy of its online users. This policy statement has been written in compliance with art. 13 of Regulation (EU) 2016/679 ("**Regulation**") in order to inform you about our privacy policy and how your personal data is handled when using our website (www.iprona.com; hereinafter "**Website**"). The information and data provided by you or acquired in connection with the use of the services of the Website will be processed in compliance with the provisions of the Regulation and the confidentiality obligations in force with regard to Iprona's activities.

In compliance with the Regulation, data is being processed by Iprona in accordance with the principles of lawfulness, fairness, transparency, purpose and retention time limitation, data minimization, accuracy, integrity and confidentiality.

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1. Data Controller

The data controller of the processing of data through the Website is Iprona. For any information on how your personal data are processed by Iprona – including a list of the appointed data processors – you can contact Iprona at the following address: privacy@iprona.com.

2. Processed Personal Data

Following access to the Website, we inform you that Iprona will process personal data that may consist of an identifier such as your name, an identification number, an online username or one or more elements distinguishing your physical, physiological, mental, economic, cultural or social identity, which may lead to the data subject being identified or identifiable (hereinafter only "**Personal Data**").

The following Personal Data may be processed through the Website:

a. Web Navigation Data

The computer systems and software used to operate the Website automatically acquire certain Personal Data, as transmission of the same is implicit to the use of Internet communication protocols.

This type of information is not gathered for the purpose of linking it to identified subjects, but, by its nature, if processed and linked to data held by third parties, could lead to the user being identified. This category comprises data such as IP addresses or the domain names of the computers used by the users connecting to the Website, the URI (Uniform Resource Identifier) addresses of the requested resources, the time of the request, the method used to make the request of the server, the size of the file sent in response to the request, the numerical code indicating the state of the response made by the server (complete, error, etc.) and other parameters pertaining to the user's operating system and type of device being used. These data are used exclusively to obtain anonymous statistical information about Website use and to ensure the site is working properly, as well as making it possible to pinpoint any anomalies or improper use of the site; they are deleted immediately after the processing. In the event of unlawful attacks against either the Website or related third parties, these data may be used to identify the guilty parties; with exception of the latter case, the data regarding Website contacts are deleted within seven days.

b. Special Categories of Personal Data

When using the "Careers at Iprona" section of the Website, Personal Data falling within the categories referred to in art. 9 of the Regulation ("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") may be transmitted via e-mail. We invite you not to communicate such Personal data unless strictly necessary. In the event of transmission of such special categories of Personal Data, but in the absence of a specific declaration of consent to process such data (eventuality which obviously still allows you to send a curriculum vitae), Iprona cannot be held liable, since in this case, the processing will be lawful as it relates to data made manifestly public by the interested party, in accordance with art. 9(1)(e) of the Regulation. However, we specify the importance - as already indicated above - to express an explicit consent to the processing of the special categories of Personal Data if you decide to share such information.

For recruiting purposes, Iprona may analyze your professional social web profiles which are freely made available on the Internet (e.g. LinkedIn).

c. Data Provided Voluntarily by the Subject

You will be able to voluntarily provide Personal Data (such as, for instance, a name or an e-mail address) to Iprona through the Website or our e-mail address info@iprona.com. Iprona will process such data in compliance with the provisions of the Regulation, assuming that the Personal Data refers to you or to third parties, who have expressly authorized you to lawfully confer their data.

In this event, you act as independent data controller, and shall be responsible for all the duties and liabilities foreseen by the Regulation. Therefore, you grant us the fullest possible exemption from any protest, claim, request for damages from data processing, etc. that may be made against Iprona by third parties whose Personal Data have been processed through your using the Website functions in violation of the applicable legislation on personal data protection. Notwithstanding this, in the event of you providing or otherwise handling the Personal Data of any third party when using the Website, you hereby declare – and take full legal responsibility for the declaration – that there is a sound legal basis for doing so, in accordance with art. 6 of the Regulation legitimizing the processing of personal data.

d. Cookies

Iprona collects Personal Data through cookies. More information on the use of cookies is available [here](#).

3. Purposes of the Processing

Iprona may process your Personal Data for the following purposes:

- a) to respond to requests for assistance or information, or to forward certifications held by Iprona;
- b) to analyze CVs and to contact candidates who send job applications to the e-mail addresses indicated in the “Careers at Iprona” section of the Website;
- c) to comply with legal, accounting or tax obligations.

4. Lawfulness of the Processing

The legal basis for processing Personal Data for the purposes set out in Section 3 (a-b) is art. 6(1)(b) of the Regulation, as the processing is necessary to process your data in order to provide our Services and/or to reply to your queries. Providing personal details for these purposes is optional, but failure to do so will make it impossible for Iprona to provide the requested services, to respond to requests or to evaluate job applications. With specific reference to the purpose 3(b) and the related analysis of professional social media profiles freely available on the Internet as per section 2(b), the legal basis of the processing is art. 6(1)(f) of the Regulation: a legitimate interest of Iprona to verify any risks on the suitability of the candidate to hold the specific open position.

The purpose of section 3(c) represents a legitimate processing of Personal Data pursuant to art. 6(1)(c) of the Regulation: once the Personal Data have been provided, the processing is necessary to fulfill a legal obligation to which Iprona is subject.

5. Recipients of the Personal Data

For the purposes stated in section 3, your Personal Data may be shared with:

- a) employees of Iprona and the administrative, accounting or IT staff of Iprona, who are authorized persons under the direct authority of Iprona (and as such, are bound by an appropriate legal obligation of confidentiality);
- b) service providers and the Website host, who are appointed as data controllers pursuant to arts. 28 and 29 of the Regulation, and receive appropriate operational instructions in this regard;
- c) jurisdictional authorities in the exercise of their functions when requested by the Regulation.

A list of data processors referred to in point b) above may be requested by sending an email to: privacy@iprona.com.

6. Transfer of the Personal Data

Your Personal Data will not be shared with any Recipients outside the European Economic Area.

7. Data Retention Times

Personal Data processed for the purposes set out in Section 3(a) will be kept for the time strictly necessary

to achieve those purposes. In any case, Iprona will process Personal Data up to the time allowed by Italian law in pursuit of its own interests (Art. 2946 ff. Codice Civile). With regard to the CVs sent to personnel@iprona.com, Personal Data will be kept as long as the position for which the CV was sent is available or, in the case of a spontaneous application, until at a maximum of six months. Nevertheless, Iprona may also contact the candidate before this deadline to request an extension of this retention period.

The Personal Data handled for the purposes stated in section 3(c) will be stored for the time permitted by the specific applicable laws.

You can request further information on data retention times and the criteria adopted to establish these times by writing to the following address: privacy@iprona.com.

8. Data Subject Rights

Pursuant to Art. 15 ff. of the Regulation, you have the right to ask Iprona, at any time, to access your Personal Data, to rectify or to fully or partially erase them or to oppose against their treatment, to request a restriction of their processing in cases foreseen by Art. 18 of the Regulation, and to obtain the Personal Data pertaining to you in a structured, commonly used and machine-readable format in cases foreseen by Art. 20 of the Regulation.

Requests of this kind can be sent in writing to Iprona at the following e-mail address: privacy@iprona.com.

In any case, you are always entitled to file a complaint with the competent Supervisory Authority (in Italy: *Garante per la Protezione dei Dati Personali*) pursuant to art. 77 of the Regulations, in the event that you believe your Personal Data have been processed in violation of the applicable legislation.

9. Amendments

This privacy policy is effective from 25.05.2018. Iprona reserves its right to change or to simply update its content, also due to variations of applicable legislation. You will be informed of any such changes through publication on the Website. Therefore, Iprona invites you to consult this section regularly in order to familiarize yourself with the most recent and up-to-date version of the privacy policy; this way you will always be adequately informed about the gathered Personal Data and the processing.