

PRIVACY POLICY www.sochim.com
Information notice pursuant to Art. 13 of the Regulation (EU) 2016/679 (“GDPR”)

DATA CONTROLLER, pursuant to art. 4 and art. 24 of the Regulation (EU) 2016/679 is **SOCHIM INTERNATIONAL SPA**, Via Ghisolfa, 86 – 20010 Cornaredo (MI), represented by the managing director. You can contact the Controller at any time at the following contacts: e-mail: sochim@sochim.it; tel. +39 02 620201. The Data Controller has activated a mailbox for the management of privacy issues: privacy@sochim.it.

In compliance with the provisions of EU Reg. 2016/679 (General Data Protection Regulation) we provide you with the necessary information regarding the processing of personal data.

PROCESSED PERSONAL DATA

Personal data: any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person (such as name, last name, date of birth, address, email, telephone number).

Browsing data

During their ordinary course of operation, the IT systems and software procedures required to run this website acquire certain Personal Data, whose transmission is implicit in the use of Internet communication protocols. This information is not collected to be associated with identified Data Subjects but, by its very nature, it could enable identification of the users through the processing and matching of data held by third parties. This data category includes IP addresses or domain names of computers used by the users who visit the site, as well as the URI addresses (*Uniform Resource Identifier*) of the requested resources, the time of the request, the method used to submit the request to the server, the size of the file received in reply, the numerical code indicating the status of the reply from the server (done, error, etc.) and other parameters related to the operating system and the IT environment of the user.

Data provided voluntarily by the user

The optional and voluntary disclosure of personal data (e.g.: sending of emails to the email addresses indicated on this website and/or the completion of a data collection form on this website) entails the collection and processing of the voluntary disclosed user’s data, necessary to reply to the request, as well as other personal data included in the email message (such as name, last name, address, telephone number, email address).

	Purposes	Legal basis	Data retention period	Provision of data
A	Navigation of this website / obtaining anonymous statistical information on the use of the website and services / control of website’s correct functioning.	Controller’s legitimate interest: ensure the correct browsing and usage of the website.	Duration of the browsing session, (except for any need to ascertain criminal offenses by the judicial authorities).	Necessary to access and enjoy the content on the website. Failure to provide data will make impossible to access the site.
B	Request of contacts or information by filling in the contact forms on the website or by sending e-mails to sochim@sochim.it . Any curricula collected through this channel of communication will be treated in compliance with the provisions of the information notice dedicated to the selection of applications, sent at the time	Controller’s legitimate interest: reply to users’ requests. Pre-contractual measures for the consequent personnel selection activity	1 year to respond to requests Maximum 24 months to screen Curricula	Optional to request information from the data controller or to send the CV. In case of failure to provide contact details, the data controller will not be able to

	of the first useful contact, following the sending of the curriculum.	through the collection of the CV.		respond to the requests of the interested party or evaluate the application.
C	Activities of organisational, administrative, financial and accounting nature and management of customer data, regardless of the nature of the data processed. In particular, internal organizational activities pursue these purposes.	Controller's legitimate interest and legal obligations compliance	10 years Art. 2220 Civil Code Accounting records	Necessary to ensure the management activities related to the website displayed. In case of lack of consent the data controller will not be able to pursue the internal organizational purposes.
D	With prior consent and until your objection, registration to the SOCHIM INTERNATIONAL SPA newsletter service by filling out the dedicated form, in order to receive promotional and informative communications on events organized by the Data Controller and on news concerning the Sochim world (eg. use of new machinery and technologies, new raw materials, etc.).	Consent of the interested party, expressed by checking the specific box during registration.	The data will be stored until consent is revoked. The opt out can be exercised by the user at any time. Each email will contain a clause for the unsubscription.	Optional to receive news related to the activity of the Data Controller. In case of failure to provide, the interested party will not receive the newsletter.

PERSONAL DATA RECIPIENTS

The personal data provided will be communicated to recipients, who will process the data as processors (Article 28 of the GDPR), as persons acting under the authority of the Controller and Processor (Article 29 of the GDPR) or autonomous Data Controllers, for the purposes listed above. Precisely, the data will be communicated to:

- parties that provide services for the management of the website (webmaster), of the information system and telecommunications networks used by the Data Controller;
- with prior consent, companies that assist the Data Controller in providing the newsletter service;
- studies or companies in the context of assistance and consultancy relationships;
- competent authorities for compliance with legal obligations and / or provisions of public bodies, upon request.

The list of data processors is constantly updated and available at the headquarters of the Data Controller.

DATA TRANSFER TO A THIRD COUNTRY AND / OR AN INTERNATIONAL ORGANIZATION AND GUARANTEES

Personal data provided will NOT be transferred to countries outside the European Economic Area (EEA). The database related to the website is located in Italy.

NATURE OF DATA PROVISION

With the exception of that specified for navigation and potentially identifying data, which are necessary to allow the navigation of the website and the pursuit of internal organization and management purposes, users are free to provide their personal data (as specified above).

DATA SUBJECT'S RIGHTS | COMPLAINT TO SUPERVISORY AUTHORITY

You may exercise your rights pursuant to articles 15, 16, 17, 18, 19, 20, 21, 22 of the Regulation EU 2016/679 by writing to the Controller's contacts above.

You have the right, at any time, to request the Controller to access your personal data and receive the information concerning their processing. You have the right to rectify, erase your personal data or limit their processing. Where

appropriate, you have the right to object, at any time, to the processing of your data, including profiling, and you have the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

You have the right to the portability of your personal data; in such case the Controller shall provide you with your personal data in a structured, commonly used and machine-readable format. Without prejudice to any other administrative or judicial remedy, if you consider that the processing of your personal data infringes the Regulation (EU) 2016/679, you have the right to lodge a complaint with the Data Protection Authority.

COOKIE

What are cookies?

Cookies are small text files that the sites visited by users send to their terminals, where they are stored to be re-transmitted to the same sites on subsequent visits. Cookies are used for different purposes, have different characteristics, and can be used both by the owner of the site you are visiting and by third parties. Below you will find all the information on the cookies installed through this site, and the necessary information on how to manage your preferences regarding them.

For more information on cookies and their general functions, visit an informative website such as allaboutcookies.org.

This site does not use profiling cookies either for statistical purposes or for advertising targeting. Only technical cookies are used for the use of the site itself. Temporary session cookies are used to improve browsing by adjusting the site's operation to the type of device used (computer, smartphone, tablet etc.) and to manage the statistics relating to the pages visited in aggregate and therefore anonymous.

Remember that you can also manage your cookie preferences through the browser. If you do not know the type and version of browser you are using, click on "Help" in the browser window at the top, from which you can access all the necessary information.

If you know your browser, click on the one you are using to access the cookie management page.

- [Google Chrome](#)
- [Microsoft Edge](#)
- [Mozilla Firefox](#)
- [Microsoft Internet Explorer](#)
- [Opera](#)
- [Apple Safari](#)

For more information, see www.youronlinechoices.eu.

CHANGES TO THIS PRIVACY POLICY

The Controller reserves the right to amend, update, supplement or remove parts of this Privacy Policy at its own discretion and at any time. We encourage you to periodically review our Privacy Policy. For your convenience, when we post changes, we will revise the "last update" date of the Privacy Policy.

Last update: 03.01.2022

DATA CONTROLLER – SOCHIM INTERNATIONAL SPA