



Privacy Policy

Pursuant to articles 13 and 14 of the Regulation (EU) 2016/679

Last update date: January 30, 2019

With this document, **Industria Chimica Reggiana – ICR S.p.A.**, with registered office in Reggio Emilia (Italy), via M. Gasparini n. 7, Tax Code and VAT No. 00140910357, in the person of the current legal representative, owner of www.icrsprint.it (from now on, "Site"), inform the data subject (User) that his personal data relating to navigation within the Site, with direct access from the homepage or through sub-pages, as well as related to the services offered, will be treated with utmost care and with appropriate means to guarantee security. These information - subject to provisions of Articles 13 and 14 of Regulation (EU) 2016/679 on the protection of personal data (also "General Data Protection Regulation" - GDPR) and to Legislative Decree 196/2003 ("Code regarding the protection of personal data") - are not to be considered valid for other and external websites that can be consulted through the links present on the Site.

1. DATA CONTROLLER.

The data controller is **Industria Chimica Reggiana – ICR S.p.A.**, with registered office in Reggio Emilia (Italy), via M. Gasparini n. 7, Tax Code and VAT number 00140910357. The data controller can also be contacted at: privacy@icrsprint.it.

2. DATA PROTECTION OFFICER.

The Data Protection Officer (DPO), appointed by the data controller, can be contacted at: dpo@icrsprint.it.

3. PURPOSES OF DATA PROCESSING.

The processing of User data is aimed at:

- allowing correct navigation on this Site;
- allowing registration on this Site, the management of the User profile and its access to the reserved area for downloading security and/or product technical data sheets and other available documentation;
- performing aggregate and anonymous statistical analysis of navigation and users;
- receiving, managing and answering, by e-mail and/or phone, requests made by e-mail, and/or through the contact forms contained on the Site;
- sending information and advertising communications (marketing) on the services and products offered by the data controller, by e-mail, instant messaging, text messages, phone;
- complying with all the legal obligations to which the data controller is subject;
- establishing, exercising or defending legal claims.

4. LEGAL BASIS OF DATA PROCESSING.

The processing of your personal data is lawful, as:

- necessary for the execution of the contract of which you are a part, or for the execution of pre-contractual measures adopted upon your request, to: allow correct navigation on the Site, allow the registration and management of the related user profile and its access to the reserved area; reply to the requests made by e-mail, and/or through the contact forms on the Site;
- necessary to comply with legal obligations to which the data controller is subject;

INDUSTRIA CHIMICA REGGIANA - I.C.R. S.p.A.

42124 Reggio Emilia - Via M. Gasparini, 7 - Tel. +39 0522 517803 - Fax +39 0522 514384

e-mail: icr@icrsprint.it - www.icrsprint.it - PEC: amministrazione.icrsprint@legalmail.it

Off. Comm.le Italia: 42124 Reggio Emilia - Via Neviani, 5 - Tel. +39 0522 517803 - Fax +39 0522 231819

International Department: 42124 Reggio Emilia - Via Neviani, 5 - Tel. +39 0522 513738 - Fax +39 0522 512446

Stabilimento: 42124 Reggio Emilia - Via Gasparini, 7 - Tel. +39 0522 517803 - Fax +39 0522 514384

Stabilimento: 26817 S. Martino in Strada (LO) - Via del Commercio, 1 - Tel. +39 0371 475313 - Fax +39 0371 475370

CAPITALE SOC. € 557.820,00 – R.E.A. N. 82109 M. R.E. 000534 - Reg. Imprese, COD. FISC. e PART. IVA 00140910357 COD. INTRA IT00140910357

Pag. 1 a 4





- necessary for the pursuit of the legitimate interest of the data controller, for the completion of aggregate and anonymous statistical analysis of navigation and users, aimed at a possible improvement of the Site and the understanding of how the data controller is searched on the Internet, and for the establishment, exercise and defence of legal claims;
- based on your express consent, with reference to the sending of informative and advertising communications (marketing) on the services and products offered by the owner, by e-mail, instant messaging, sms, or phone.

5. CATEGORIES AND SOURCES OF PERSONAL DATA CONCERNED.

5.1. Data deriving from User's navigation.

These data, through the normal functioning of the Site, are acquired and transmitted implicitly in the use of Internet communication protocols. This is information that is not collected to be associated with identified data subjects, but, by its very nature, through processing with data held by third parties, could allow Users to be identified.

This category of data includes the IP addresses or domain names of the computers used by the Users who connect to the Site, the addresses in the Uniform Resource Identifier (URI) of the requested resources, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server and other parameters relating to the operating system and the user's IT environment.

These data are used for the sole purpose of obtaining anonymous and aggregate statistical information on the use of the Site and to check its correct functioning, and permanently reside on third party server (hosting provider). The data could also be used to ascertain responsibility in the event of any malicious actions committed on or through the Site.

These data processing and association activities, however, are not carried out by the data controller, and are only used to check the correct functioning and are automatically deleted after processing.

5.2. Cookies.

For information on the use of cookies on the Site, visit the appropriate Cookies Policy <https://www.icrsprint.it/en/cookies.html>.

5.3. Data provided voluntarily by the User.

These data are provided by the User, during the voluntary interaction with the Site, by filling in the contact forms contained in the Site, as well as by sending e-mail or by phone, in order to register on the Site, to use services, request information, receive assistance or for any personal purpose. For all the data provided voluntarily, the User expressly authorizes the processing of the data.

6. DATA PROCESSING MODE.

The processing of your personal data is carried out, using methods strictly necessary to meet the aforementioned purposes, by means of some or the set of operations indicated in art. 4, n. 2) of the Regulation (EU) 2016/679 2016/679: collection, registration, organization, structuring, storage, consultation, processing, adaptation, modification, selection, extraction, comparison, use, interconnection, blocking, communication, cancellation and destruction of data. The operations may be carried out with or without the aid of electronic, telematic or automated means, however in compliance with the provisions of art. 32 of the Regulation (EU) 2016/679.

7. DATA PROVISION.

The provision of personal data by the User, although not a legal obligation, is:

INDUSTRIA CHIMICA REGGIANA - I.C.R. S.p.A.

42124 Reggio Emilia - Via M. Gasparini, 7 - Tel. +39 0522 517803 - Fax +39 0522 514384

e-mail: icr@icrsprint.it - www.icrsprint.it - PEC: amministrazione.icrsprint@legalmail.it

Off. Comm.le Italia: 42124 Reggio Emilia - Via Neviani, 5 - Tel. +39 0522 517803 - Fax +39 0522 231819

International Department: 42124 Reggio Emilia - Via Neviani, 5 - Tel. +39 0522 513738 - Fax +39 0522 512446

Stabilimento: 42124 Reggio Emilia - Via Gasparini, 7 - Tel. +39 0522 517803 - Fax +39 0522 514384

Stabilimento: 26817 S. Martino in Strada (LO) - Via del Commercio, 1 - Tel. +39 0371 475313 - Fax +39 0371 475370

CAPITALE SOC. € 557.820,00 - R.E.A. N. 82109 M. R.E. 000534 - Reg. Imprese, COD. FISC. e PART. IVA 00140910357 COD. INTRA IT00140910357



- a necessary requirement for: the correct navigation, registration on this Site, and the management of the related user profile, its access to the reserved area, and to manage the requests made by e-mail and/or through the contact forms contained on the Site; therefore, failure to provide data implies the impossibility to allow the registration, the correct use of the Site, the possible access to the reserved area or to give feedback to your requests;
- optional, with reference to the sending of information and advertising communications (marketing) on the services and products offered by the owner, by e-mail, instant messaging, text messages, phone; therefore, failure to provide data will not allow the data controller to send you such communications.

In any case, by providing your data for any of the purposes listed above, the data controller may process such data in order to pursue its legitimate interests in carrying out aggregate and anonymous statistical analysis of navigation. and users and to protect its rights with legal claims.

8. DATA CONSERVATION.

The User's personal data will be processed and stored for as long as necessary for correct navigation on the Site, as well as for the period necessary for complete fulfillment of requests or communications received via e-mail and/or contact forms on this Site, as well as for the period necessary to defence rights with legal claims. In case of registration to the Site, the data will be kept until the User is registered.

Personal data processed for the aforementioned marketing purposes may be retained for 2 years from the date in which the consent was obtained by the User for this purpose, subject to any opposition to receive further communications.

In any case, personal data will be processed and stored for the period necessary for the proper fulfillment of the conservation obligations for fiscal purposes or for other purposes provided for by law or regulation, to which the data controller is subject.

9. DATA COMMUNICATION.

The User's personal data may be disclosed to, or become aware of, for the purposes listed above and to provide, improve, protect and promote our services:

- subjects authorized to treatment, that is collaborators and/or employees of the data controller;
- data processors, and their authorized subjects, such as, by way of non-exhaustive example: accountants, consultants, service providers, IT service providers or their assistance, and related technical staff, any collaborators, in charge of occasional maintenance operations, all adequately trained in the protection of confidentiality;
- judicial or administrative authorities, for the fulfillment of legal obligations;
- subjects who process data in execution of specific legal obligations.

10. PROFILING.

The User's personal data are not subject to any fully automated decision-making process, including profiling.

11. TRANSFER OF DATA TO THIRD COUNTRIES.

Some of your personal data may be transferred to third countries in relation to the European Union, availing the holder of the treatment of services provided by lenders established in the United States. In one case, these suppliers adopt standard contractual clauses (available upon request to the data controller and/or the DPO at the above addresses) and in any case comply with the regulations of the EU-US Privacy Shield (Privacy Shield), as established by the United States Department of Commerce regarding the collection, use and storage of personal

INDUSTRIA CHIMICA REGGIANA - I.C.R. S.p.A.

42124 Reggio Emilia - Via M. Gasparini, 7 - Tel. +39 0522 517803 - Fax +39 0522 514384

e-mail: icr@icrsprint.it - www.icrsprint.it - PEC: amministrazione.icrsprint@legalmail.it

Off. Comm.le Italia: 42124 Reggio Emilia - Via Neviani, 5 - Tel. +39 0522 517803 - Fax +39 0522 231819

International Department: 42124 Reggio Emilia - Via Neviani, 5 - Tel. +39 0522 513738 - Fax +39 0522 512446

Stabilimento: 42124 Reggio Emilia - Via Gasparini, 7 - Tel. +39 0522 517803 - Fax +39 0522 514384

Stabilimento: 26817 S. Martino in Strada (LO) - Via del Commercio, 1 - Tel. +39 0371 475313 - Fax +39 0371 475370

CAPITALE SOC. € 557.820,00 – R.E.A. N. 82109 M. R.E. 000534 - Reg. Imprese, COD. FISC. e PART. IVA 00140910357 COD. INTRA IT00140910357



data from the European Union and transferred to the United States. This instrument was deemed appropriate by the European Commission with Implementing Decision (EU) 2016/1250 of 12 July 2016.

12. RIGHTS OF THE DATA SUBJECT.

Pursuant to articles 15-18 and 20-21 of Regulation (EU) 2016/679, the User has the right to obtain:

- a. confirmation of the existence or not of personal data concerning them, even if not yet registered, and their communication in an intelligible form;
- b. indication:
 - of the origin of personal data;
 - of the purposes and methods of processing;
 - the logic applied in case of treatment carried out with the 'Auxiliary I of electronic instruments;
 - of the identification details of the owner and any responsible parties;
 - the subjects or the categories of subjects to whom the personal data may be communicated or who can learn about them as managers or agents;
- c. updating, rectification or, when interested, the integration of data;
- d. cancellation, transformation into anonymous form or blocking of data processed unlawfully, including data whose retention is unnecessary for the purposes for which the data were collected or subsequently processed;
- e. attestation that the operations referred to in c) and d) have been brought to knowledge, also as regards their content, of those to whom the data have been communicated or distributed, except in the case where this proves impossible or involves a manifestly disproportionate use of resources with respect to the protected right.

The User has the right to object, in whole or in part:

- a. for legitimate reasons, to the processing of personal data concerning him, even if pertinent to the purpose of the collection;
- b. to the processing of personal data concerning him for the purpose of sending advertising or direct sales material or for carrying out market research or commercial communication.

You have the right to revoke, at any time, the consent given in relation to the processing activities of which it represents the legal basis, without affecting the lawfulness of the processing based on consent given before the revocation.

The User has the right to data portability, namely to receive personal data concerning him in a structured format, in common and automatically readable by automatic device, and the right to transmit this data to another data controller without hindrance. The User also has the right to lodge a complaint with a supervisory authority (in Italy, the Authority for the Protection of Personal Data: www.garanteprivacy.it; for other Countries, please visit: edpb.europa.eu/about-edpb/board/members_en).

The User can exercise his rights with a written request sent to the data controller, at the addresses indicated above.

13. CHANGES TO THE PRIVACY POLICY.

Industria Chimica Reggiana – ICR S.p.A. reserves the right to modify, update, add or remove portions of this Privacy Policy at its discretion and at any time.

The User data subject must check periodically any changes posted on Site.

INDUSTRIA CHIMICA REGGIANA - I.C.R. S.p.A.

42124 Reggio Emilia - Via M. Gasparini, 7 - Tel. +39 0522 517803 - Fax +39 0522 514384

e-mail: icr@icrsprint.it - www.icrsprint.it - PEC: amministrazione.icrsprint@legalmail.it

Uff. Comm.le Italia: 42124 **Reggio Emilia** - Via Neviani, 5 - Tel. +39 0522 517803 - Fax +39 0522 231819

International Department: 42124 **Reggio Emilia** - Via Gasparini, 7 - Tel. +39 0522 517803 - Fax +39 0522 514384

Stabilimento: 42124 **Reggio Emilia** - Via Gasparini, 7 - Tel. +39 0522 517803 - Fax +39 0522 514384

Stabilimento: 26817 **S. Martino in Strada (LO)** - Via del Commercio, 1 - Tel. +39 0371 475313 - Fax +39 0371 475370

CAPITALE SOC. € 557.820,00 – R.E.A. N. 82109 M. R.E. 000534 - Reg. Imprese, COD. FISC. e PART. IVA 00140910357 COD. INTRA IT00140910357