

PRIVACY POLICY

Under Article 13 of European Regulation 679/2016 on the protection of personal data and the free movement of such data (the "Regulation" or "GDPR"), we inform you that the Data Controller of the data communicated by the user or otherwise obtained as a result of the use of the website URL <https://pollution.it/it/> and its subdomains (the "Site") is POLLUTION SRL, with registered office in Via Guizzardi, 52 - BUDRIO (BO) C.F. 04051900373 and VAT 00694631201 (hereinafter the "Company" or "Data Controller"), contactable at the e-mail address privacy-pll@polgroup.it

1) Types of processed data

- **Browsing data**

The computer systems and software procedures used to operate the Site acquire, during their regular operation, some personal data whose transmission is implicit in the use of Internet communication protocols or is used to improve the quality of the service offered. This information is not collected to be associated with identified interested parties, but by its very nature, it could allow users to be identified through processing and association.

This category of data includes the IP addresses or domain names of the computers used by users connecting to the Site, the URI (*Uniform Resource Identifier*) notation addresses of the requested resources, the time of the request, the method used in submitting 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 (successful, error, etc.) and other parameters related to the user's operating system and computer environment.

This data is used to obtain anonymous statistical information on the use of the Site and to check the correct functioning of the computer systems. The data could also be used to ascertain liability in the event of hypothetical computer crimes or damage to the Company or third parties.

- **Data voluntarily provided by the user concerned**

Users are not required to provide personal data to visit the Site. However, contacts between users and the Company, through authentication to the services of the Site and filling in contact forms, sending e-mails, messages, or any kind of communication to the addresses indicated on the Site, entail the consequent acquisition of common personal data, such as by way of example first name, last name, address, and telephone number, as well as any other personal data that will be provided by the user spontaneously by interacting with the Company through the Site.

2) Purpose and legal basis for processing

Personal data may be collected for the following purposes:

- a) for registration and access to restricted areas of the Site to provide the services offered by the Company or for the purchase of products marketed by the Company;



- b) to manage user requests for information;
- c) monitoring and improving the operation and content of the Site;
- d) fulfilling legal obligations to which the Company is subject;
- e) sending advertising material, conducting market research, and carrying out commercial promotion activities of the products provided by the Company;
- f) profiling activities - also through third-party companies - based on the user's choices and/or consumption habits concerning products from the Company in order to send personalized offers;
- g) sending newsletters to periodically update the user on the Company's initiatives (so-called newsletter);
- h) collect information regarding the use of the Site (such as frequency of use, statistics, etc.) through the use of cookie (see the "[Cookie Policy](#)").

Concerning the purposes set out in points a), b), c), and d) above, the provision of personal data is necessary and does not require your consent. Any refusal to provide the data may result in the inability of the Company to comply with the requested service, fulfill legal obligations, and process and respond to your requests. Providing personal data via the contact forms on the Site is not a legal or contractual requirement; however, providing the data is necessary to fulfill your request.

The processing of personal data for the purposes referred to in e), f), and g) requires your consent, subject to particular exceptions provided for in the data protection regulations; such data is optional, and a refusal to provide it will have no consequences.

In addition, the Company - under Article 130, paragraph 4, of Legislative Decree 196/2003 and its subsequent amendments - without your consent, may send you communications for direct sales of products or services similar to those you have already purchased (so-called soft spam) unless you refuse.

3) Mode of data processing and storage

Within the Company's organizational structure, personal data will be processed by authorized persons acting under the authority of the Data Controller, adequately instructed by the Data Controller, mainly with electronic systems in accordance with the principles applicable to the processing of personal data under Article 5 of the Regulations.

4) Data retention period

Your data will be kept for the period necessary to fulfill legal obligations.

The data retention period depends on the purposes for which it is processed and, therefore, may vary. The criteria used to determine the applicable retention period are as follows: the retention of personal data covered by this notice will take place for as long as necessary (i) to manage the contractual relationship with you, (ii) to handle complaints or specific requests from you, (iii) to assert rights in court as well as (iv) for as long as required by applicable legal regulations.



For the purposes referred to in **e)** and **g)** of this privacy policy, the retention time of personal data is 24 months from collection, unless there is a revocation of consent by the data subject before the expiration of this period. At the end of 24 months, personal data will be automatically deleted or permanently and irreversibly anonymized.

For the purpose of **f)** of this privacy policy, the retention time of personal data is 12 months after the collection, unless there is a revocation of consent by the data subject before the expiration of this period. At the end of 12 months, personal data will be automatically deleted or permanently and irreversibly anonymized.

For the purpose of **h)**, please refer to what is stated within the [Cookie Policy](#).

5) Communication, disclosure and transfer of data

To process personal data for the purposes specified in this Privacy Policy, we may transfer your data to third parties located outside the European Union and Europe.

To ensure that your data is processed securely, we will only transfer data to countries outside the European Union in accordance with the GDPR, which requires that one of the following conditions be met:

- the European Commission has decided that the third country ensures an adequate level of protection for Personal Data;
- the transfer is subject to adequate safeguards and provided that data subjects have enforceable rights and effective remedies;
- the transfer is subject to binding corporate rules;
- the transfer is made based on one of the GDPR's exemptions to restrictions on transferring Personal Data outside the European Union.

In particular, please note that if you have opted to receive our newsletter, the contact information you have provided (email address, first and last name) will be transferred to the U.S. if Mailchimp - an online marketing platform of The Rocket Science Group LLC - and/or to Flodesk is used. Transfer of personal data from EU countries to the U.S. is currently permitted and regulated by the Data Privacy Framework. If, for whatever reason, you do not want this transfer to take place, we ask that you do not subscribe to our newsletter because it will be impossible for us to provide the requested service when using Mailchimp and/or Flodesk. If you are already subscribed to the newsletter, you can unsubscribe anytime by simply asking to delete your name and address via the unsubscribe link at the bottom of the newsletter or by writing an email at privacy-pll@polgroup.it.

Your data may be disclosed to the following categories of parties within the scope of the above purposes:

Personal data may also be communicated to the competent Authorities or public or private entities to fulfill obligations required by law.

- data processors identified from time to time;
- third parties who provide any services on behalf of the Company;



- companies and professionals that the Data Controller uses to protect one of its rights (e.g., accountants, lawyers, tax advisors, consultants, etc.);
- public authorities authorized by law, in case of audits, assessments, and/or inspections.

Personal data may also be communicated to the competent Authorities or public or private entities to fulfill obligations required by law.

6) Data subject's rights

As a data subject, you will be able to exercise, concerning the processing of personal data described above, the following rights under Articles 15 to 22 of the GDPR:

- Right of access: to know what data is being processed and all information related to the processing.
- Right of rectification: to request data modification because it is inaccurate or obsolete.
- Right to portability: to obtain a copy of the data being processed in a structured, commonly used, and machine-readable format to facilitate a possible transfer of the data to another data controller other than the Company.
- Right to limit processing: to restrict the processing of one's data, provided that one of the hypotheses provided for by the applicable regulations applies.
- Right to erasure: to request the deletion of data.
- Right to object: to request the cessation of data processing.
- Right to complain to the supervisory authority: to promote any reports or complaints to the Data Protection Authority.

The exercise of these rights can be carried out through postal, electronic, or any additional means of communication chosen by the interested party, using the contacts indicated above and attaching to the request the necessary documents (*e.g.*, a copy of the identity document) to identify the interested party, entitled to promote the request.

Last updated [January 02, 2024]