



HABA ServizioPiastre s.r.l. a socio unico
Sede Legale:
Via G. Pascoli, 7 – 24121 Bergamo
Sede Amministrativa/Commerciale/Produttiva:
Via Emilia, 27/29 – 24052 Azzano San Paolo (BG)

Uffici Commerciali:
Tel. 035-899190 – Fax 035-899167
<http://www.haba.it> email: info@haba.it

Uffici Amministrativi:
Te. 035-893020 – Fax 035-899924
Cod. Fisc. e Reg. Imprese di Bg n. 01779090123
P.Iva 02093610166 – R.E.A. n. 249182
Capitale Sociale: € 20.000 i.v.

PRIVACY POLICY

Within the meaning and for the purposes (i) of Legislative Decree of 30 June 2003, n. 196, the ‘Privacy Code’, (ii) of EU Regulation 2016/679 on the ‘*protection of natural persons with regard to the processing of personal data, and on the free circulation of such data*’, the “GDPR”, art.13 and 14, and (iii) of the Legislative Decree of 10 August 2018, n. 101 which the provisions for the adaptation of national legislation to the EU Regulation 679/2016, also jointly called ‘Privacy Policy’, some obligations are set forth upon the subjects carrying out the processing – intended as ‘*the collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction*’ – of personal data referred to other subjects (The “Processing”).

HABA ServizioPiastre S.r.l. headquartered in **Via Pascoli 7 - 24121 Bergamo** (la “Società”) wish to inform you, in the following sections, about the modalities and purposes dealing with the processing of your personal data.

A) Data Controller

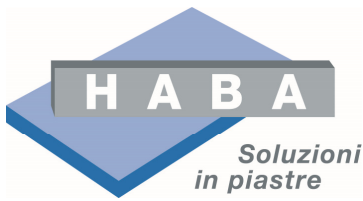
The Data Controller is the person who determines the purposes for which and the manner in which personal data are to be processed (the ‘Data Controller’) and is identified in **HABA ServizioPiastre S.r.l.**

The Data Controller may be contacted by e-mail at the following address Via Emilia, 27/29 – 24052 AZZANO SAN PAOLO (BG) or at the following e-mail address valter.papini@haba.it

B) Modalities to collect data from the Data Subject

The Data Controller may acquire your personal data under the following circumstances:

- C) if you contact us through our website, by email or phone, to require information about our services and products;
- D) if you buy a product and/or a service carried out by our Company, including pre-contractual negotiations;
- E) if you provide your data to receive direct marketing communications, newsletters and/or to be updated on the events organised and the marketing initiatives carried out by the Company;
- F) if the commercial *partners* of the Data Processor transfer to the Controller your personal data lawfully;
- G) if the Data Controller acquires your personal data from other sources in accordance with the applicable laws and the requirements under Art. 14 of the GDPR (i.e. public registers, directories, acts or documents available to whoever within the limits and under the conditions provided by law on their knowability).



HABA ServizioPiastre s.r.l. a socio unico
Sede Legale:
Via G. Pascoli, 7 – 24121 Bergamo
Sede Amministrativa/Commerciale/Produttiva:
Via Emilia, 27/29 – 24052 Azzano San Paolo (BG)
Uffici Commerciali:
Tel. 035-899190 – Fax 035-899167
<http://www.haba.it> email: info@haba.it
Uffici Amministrativi:
Te. 035-893020 – Fax 035-899924
Cod. Fisc. e Reg. Imprese di Bg n. 01779090123
P.Iva 02093610166 – R.E.A. n. 249182
Capitale Sociale: € 20.000 i.v.

H) Categories of data subject to Processing

Data processed by Data controller may include:

- a) Data related to natural persons that are necessary to sign and perform a contractual/commercial relationship with a customer/supplier, such as those referred to the customers/suppliers themselves or those of the legal representative of the customers/suppliers signing the contract for and on behalf of the latter or of the company's internal representatives of the customers/suppliers themselves (for ex. Name, surname, phone number, email, bank account), involved in the activities dealing with the main contractual/commercial relationship, as well as any other information necessary to perform the contractual/commercial relationship and/or provide services;
- b) Information dealing with the modalities in which you use the company's website, you open or send the communications received by the company, including the information collected by the means of cookies and other tracking technologies (our Cookie policy is available at the following link www.haba.it);
- c) Images of you collected with photos/videos realised during any event organised by the company.

(referred to also as "Data")

I) Purposes and legal basis of the processing

Within the meaning of the Privacy Policy, the processing of personal data must be legitimised by one of the legal provisions provided by art 6 of the GDPR. These are specifically described for each purpose under which the Data Controller processes your data:

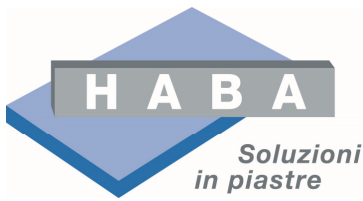
- a) **Management of the contractual relationship**: the Data Controller shall process your data to reply to your requests, and to fulfil the preliminary requirements for the conclusion of the contract

Legal basis: processing is necessary for the performance of your contract or of the pre-contractual measures adopted upon your request (art. 6 par. 1 letter b of the GDPR).

Data storage policy: The data that we collect only for an estimate will be stored for a maximum period of five years. The data processed to perform the contract may be stored for the whole duration of the contract and for the subsequent ten years from the end of the fiscal year following the year in question.

- b) **Fulfilment of legally binding obligations**: The Controller processes your data to fulfil any private law, administrative, fiscal, accounting obligation provided by law, a Regulation, the European legislation or by an order of the Authorities deriving from the outstanding relationship with you;

Legal basis: processing is necessary for the performance of your contract (art. 6 par. 1 letter b of the GDPR) or to fulfil a legal obligation of the Controller (art. 6 par. 1 lett. c del GDPR)



HABA ServizioPiastre s.r.l. a socio unico
Sede Legale:
Via G. Pascoli, 7 – 24121 Bergamo
Sede Amministrativa/Commerciale/Produttiva:
Via Emilia, 27/29 – 24052 Azzano San Paolo (BG)
Uffici Commerciali:
Tel. 035-899190 – Fax 035-899167
<http://www.haba.it> email: info@haba.it
Uffici Amministrativi:
Te. 035-893020 – Fax 035-899924
Cod. Fisc. e Reg. Imprese di Bg n. 01779090123
P.Iva 02093610166 – R.E.A. n. 249182
Capitale Sociale: € 20.000 i.v.

Data storage policy: The Data may be stored for the period of time necessary to fulfil any legal obligation and, in any case, for the whole duration of the contract and for the subsequent ten years from the end of the fiscal year following the year in question.

- c) Defend the case for the Data Controller's rights: if necessary, the Controller will provide all the information dealing with you to the Authorities and the bodies responsible for the enforcement of law, regulation or judicial documents, as well as to third parties into formal dispute. The Data Controller reserves the right to process your personal data to defend his or her rights deriving from the Contract before a judge, also for debt collection, directly or by third parties (debt collection agencies/companies), who will receive your data only for these purposes.

Legal basis: processing is necessary for the purposes of the legitimate interest pursued by the controller, in order to defend a right or make further demands on the outstanding commercial relationship, except where such interests are overridden by the interests or fundamental rights (art. 6 par. 1 letter f of the GDPR).

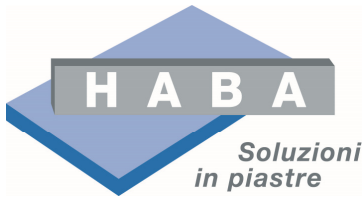
Data storage policy: your data may be stored for the necessary period of time in order to allow the Company to take actions or defend against eventual claims towards you or third parties.

- d) Promotional and marketing activities: The data collected for the selling of a product and/or service also through the company's website may be processed to send you commercial/promotional communications – by automated means (such as email, sms or mms) and/or traditional (i.e. paper mail) related to services offered by the Company – and/or invitations to events organised by the company, as well as for the realisation of market researches, statistical analyses or customer satisfaction collection. At any moment, you will be informed of the modalities to withdraw consent to processing, easily and free of charge. As for promotional purposes of the company, with your consent, the Controller will collect and publish your image on any means of communication, on the company's website, on *social medias* or in the local, national or international newspapers as well as on any other means (existing or to be invented in the future).

Legal basis: you have given your consent as data subject of the processing (art. 6 par. 1 letter a of the GDPR).

Data storage policy: data collected for *marketing purposes* may be stored until you withdraw consent, except when any image of you has been published on our website, social medias or commercial brochures.

If the Controller intend to process your data for other purposes than those mentioned above, he or she is required to inform you of these other purposes before performing it.



HABA ServizioPiastre s.r.l. a socio unico
Sede Legale:
Via G. Pascoli, 7 – 24121 Bergamo
Sede Amministrativa/Commerciale/Produttiva:
Via Emilia, 27/29 – 24052 Azzano San Paolo (BG)
Uffici Commerciali:
Tel. 035-899190 – Fax 035-899167
<http://www.haba.it> email: info@haba.it
Uffici Amministrativi:
Te. 035-893020 – Fax 035-899924
Cod. Fisc. e Reg. Imprese di Bg n. 01779090123
P.Iva 02093610166 – R.E.A. n. 249182
Capitale Sociale: € 20.000 i.v.

J) Nature of consent to data processing

Consent to data processing for letter a), b), c) purposes is compulsory since it is required to perform legal and contractual obligations. Any refusal or successive withdrawal may determine the inability for the Controller to fulfil the outstanding contractual relationship.

Instead, consent to data processing for letter d) is optional and the failure to give consent to the processing to those data will determine the inability to carry out the abovementioned activities.

K) Modalities to process Personal Data

Processing will be carried out by the Company in compliance with the security measures under art. 32 of the GDPR, through manual, information system and computerised tools specifically designed to store, manage and transmit them to pursue only the purposes for which the data were collected and, in any case, to guarantee their security and confidentiality, as well as in full compliance with the principles of fairness, lawfulness and transparency.

No automated tools are used by the Controller to process data.

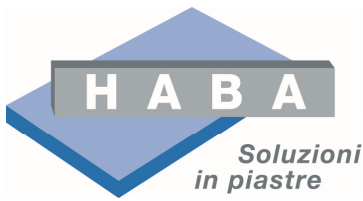
L) Communication of Data

Access may be granted to:

- a) Controller's employees and associates in charge and/or internal Processors and/or system administrators;
- b) External third parties carrying out on behalf of the controller *outsourcing* activities for purposes dealing with support, administrative, accounting, fiscal areas or for purposes related to supply relationship or legal protection;
- c) Supervisory bodies, judicial authorities and all other subjects which by law require such communication in order to achieve these purposes.

M) Data transfer to a third country or an international organisation

Personal data are to be processed within the European Union and stored on servers located in that area. Anyway, if necessary, the Data Controller will have the right to transmit such data to a third country or to an international organisation and / or to move the servers even outside the EU. In this case, the Data Controller ensures that the transfer of non-EU data will be carried out in accordance with the applicable legal provisions under art. 44 and following of the GDPR.



HABA ServizioPiastre s.r.l. a socio unico
Sede Legale:
Via G. Pascoli, 7 – 24121 Bergamo
Sede Amministrativa/Commerciale/Produttiva:
Via Emilia, 27/29 – 24052 Azzano San Paolo (BG)

Uffici Commerciali:
Tel. 035-899190 – Fax 035-899167
<http://www.haba.it> email: info@haba.it

Uffici Amministrativi:
Te. 035-893020 – Fax 035-899924
Cod. Fisc. e Reg. Imprese di Bg n. 01779090123
P.Iva 02093610166 – R.E.A. n. 249182
Capitale Sociale: € 20.000 i.v.

N) Data subject's rights

The Company informs you that, pursuant to articles 15-22 of the GDPR, you, in relation to your personal data, as Data Subject may exercise specific rights at any time, by contacting the Data Controller, such as:

- a) Access to your personal data and information;
- b) Without undue delay, rectification of incorrect personal data, as well as the integration of the incomplete data (with an integrative statement);
- c) The erasure of your personal data if (i) data are no longer necessary in relation to the purposes for which they were collected, (ii) you withdraw consent on which the processing is based and there is no other legal ground for the processing; (iii) you objected to the processing pursuant to art. 21 of the GDPR, (iv) data have been unlawfully processed, or (v) the erasure is necessary to fulfil a legal obligation;
- d) Limitation to the processing of your personal Data as provided by art. 18 of the GDPR.

If the Processing is based on your consent or on the contract and this is carried out by automated means, you have the right to receive these Data in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller unimpeded. This right is not applied if the Processing is necessary to perform a duty of public interest or is connected to the exercise of a public office of the Data Controller.

If you consider that the Processing breaches the Privacy Policy or the Controller has not fulfilled the abovementioned duties, pursuant to art. 77 of the GDPR you have the right to lodge a complaint with a supervisory authority of the Member State in which he or she resides or habitually works, or the State in which the supposed violation has occurred, without prejudice to any other administrative or judicial appeal, in case of a violation to the provisions of the abovementioned Regulation. This is without prejudice of any other administrative or judicial remedy.

If the Processing is based on your consent (art. 6 par. 1 lett. A of the GDPR), you have the right to withdraw consent, at any time, without prejudice to the lawfulness of the processing carried out upon your consent given before the revocation.

If you need further information on the processing of your personal data and to exercise the abovementioned rights, you can send a written request using the contacts provided in the 'Data Controller' section of this statement. If you request more information about your data, the data controller shall respond promptly – unless this proves impossible or involves a manifestly disproportionate effort compared with the right to be protected – and in any case no later than thirty days from the request. The data controller will justify any inability or delay in doing so to meet the request.



HABA ServizioPiastre s.r.l. a socio unico
Sede Legale:
Via G. Pascoli, 7 – 24121 Bergamo
Sede Amministrativa/Commerciale/Produttiva:
Via Emilia, 27/29 – 24052 Azzano San Paolo (BG)

Uffici Commerciali:
Tel. 035-899190 – Fax 035-899167
<http://www.haba.it> email: info@haba.it

Uffici Amministrativi:
Te. 035-893020 – Fax 035-899924
Cod. Fisc. e Reg. Imprese di Bg n. 01779090123
P.Iva 02093610166 – R.E.A. n. 249182
Capitale Sociale: € 20.000 i.v.

COOKIE POLICY

As a Data Controller within the meaning of art. 4 of the GDPR (“Company” or “Controller”), HABA SERVIZIOPIASTRE SRL wish to inform you, as a Data Subject (“Data subject” or “User”) about the cookie types used and the purposes to be achieved with the information collected – also providing the procedures to select/deselect the single cookies.

This Cookie Policy is applied to the website www.haba.it (hereinafter called “website”) and is referred to the processing of personal data carried out by the Company during your visit on the website and the interaction of users with the services and features of the website.

The Privacy policy is compliant with the General Provision of the Italian Data Protection Authority of May 8th 2014 and is also to be considered as a privacy statement to the subjects concerned within the meaning of (i) Art. 13 of the Legislative Decree of June 30th 2003, n. 196 (“Privacy Code”), (ii) EU Regulation 2016/679 on the ‘protection of natural persons with regard to the processing of personal data, and on the free circulation of such data’, the “GDPR”, art.13 and 14, and of (iii) the Legislative Decree of August 10th 2018, n. 101 – as the subsequent compliance of the National Legislation to the GDPR.

This document is valid only for the present official “Website” of HABA SERVIZIOPIASTRE SRL, and not for other external websites possibly visited by the user during the network browsing.

Our website collects the users’ data in two different ways.

Voluntary Data Submission

The website may collect other data in case of voluntary use of services by the User, such as communication services (contact forms, comment boxes), which will be exclusively used to provide the service required and for which a specific statement has been prepared on the relative page of the website.

Automatically collected data:

Navigation Data

The computer systems and software procedures used for this “Website” collect in the normal course some personal data whose transmission is implicit in the use of the Internet communication protocols.

This information is not collected in order to be associated with identified data subjects, but for their very nature they may be able to identify the users through processing and association with data held by third parties.

Also, during the browsing, the following information of the users may be collected and stored in the server log files (hosting) of the website. These shall include, but not be limited to the following:

- Internet protocol address (IP);
- browser;
- parameters of the device used to connect to the website;
- name of the internet service provider (ISP);
- date and time of visit;
- webpage of origin (referral) and exit of the user;



HABA ServizioPiastre s.r.l. a socio unico
Sede Legale:
Via G. Pascoli, 7 – 24121 Bergamo
Sede Amministrativa/Commerciale/Produttiva:
Via Emilia, 27/29 – 24052 Azzano San Paolo (BG)

Uffici Commerciali:
Tel. 035-899190 – Fax 035-899167
<http://www.haba.it> email: info@haba.it

Uffici Amministrativi:
Te. 035-893020 – Fax 035-899924
Cod. Fisc. e Reg. Imprese di Bg n. 01779090123
P.Iva 02093610166 – R.E.A. n. 249182
Capitale Sociale: € 20.000 i.v.

- number of clicks.

These data are used for statistical and analytic purposes, exclusively in aggregated form. The IP address is only used for security purposes and is not cross-checked with other data.

Cookies

Our website uses cookies, in order to make our services as efficient and simple to use as possible.

Cookies are small text files that allow us to compare new and past visitors and to understand how users go through our website. We use the data collected through cookies in order to offer an experience that is able to reflect your interest, preferences and facilitate the access to our services. Cookies do not record any personal data of a user and the relative identifiable data will not be stored. If you wish to disable the use of cookies you have to customise the settings on your computer and delete all the cookies or activate an alert when cookies are stored. To proceed without modifying the use of cookies you only need to continue browsing. Please visit AboutCookies.org for further information about cookies and how they influence your browsing experience.

The website uses the following categories of cookies:

Essential cookies

These cookies are necessary to browse through our website and use its features, such as access to the different restricted areas of the website. Without these cookies some of the necessary services will not be available.

Experience and insight cookies

These cookies collect information on how users use our website, for example what are the most visited pages or the potential error messages from the webpages. These cookies do not collect information that identify a visitor. All the information collected through cookies are aggregated and, thus, anonymous. They are only used to make sure you have the best experience possible. By visiting our website, the user accepts that these cookies are installed on his or her device.

Functional cookies

Cookies allow to remember the choices made by the user (such as name, language or region of origin) and provide advanced customised experiences. These cookies may also be used to remember the modifications made to the text size and font as well as other customisable parts of the website. Also, they may be used to provide services required such as watch a video or comment on a blog. The information collected by this kind of cookies may be anonymous in order to avoid the monitoring of the browsing activity on other websites. By visiting our website, the user accepts that these cookies are installed on his or her device.

Third party cookies

Google Analytics

This website uses Google Analytics, an analysis service offered by Google (“Google”). Google Analytics uses “cookies”, which are text files placed on your computer to allow the website to analyse how the users go through the website. The information generated by cookies on the use of the website (including your anonymous IP address) will be transmitted and deposited among Google servers located in the United States. Google will use this information to analyse your experience on the website, fill in reports on the activities of the website and provide



HABA ServizioPiastre s.r.l. a socio unico
Sede Legale:
Via G. Pascoli, 7 – 24121 Bergamo
Sede Amministrativa/Commerciale/Produttiva:
Via Emilia, 27/29 – 24052 Azzano San Paolo (BG)

Uffici Commerciali:
Tel. 035-899190 – Fax 035-899167
<http://www.haba.it> email: info@haba.it

Uffici Amministrativi:
Te. 035-893020 – Fax 035-899924
Cod. Fisc. e Reg. Imprese di Bg n. 01779090123
P.Iva 02093610166 – R.E.A. n. 249182
Capitale Sociale: € 20.000 i.v.

other services related to the activities of the website and the use of the Internet. Google may also transfer this information to third parties if required by law or if these third parties process the abovementioned information on behalf of Google. Google will not associate your IP address to other data owned by Google. You can refuse to use cookies by selecting the relative setting on your browser, taking into consideration that this will prevent the use of all the functions of the website. By using this website, you give consent to the processing of your data by Google for the modalities and purposes mentioned above.

You can prevent Google from detecting a cookie generated and linked to the use of the present website (including your IP address) and the processing of these data downloading and installing the following plugin for your browser: <http://tools.google.com/dlpage/gaoptout?hl=en>.

Cookie preferences

Your consent to the use of cookies is given as follows:

- By clicking on the button “Accept and close” on the banner containing the short statement that appears when you access the website;
- By continuing your browsing through another area of the website or selecting an element of the same page.

How to modify cookie settings

Please verify that your computer/smartphone settings shall accept or reject cookies. You can set your browser in order to be warned before accepting cookies, or you can configure it to refuse them automatically – even if in this way you won't have access to all the features of the website. Further information is available by clicking on the “Find out more here” button on your browser.

You have to be sure that all the browsers you use, if you use a computer in different locations, is configured on the basis of your cookie preferences.

Below you can find the procedure to follow to manage cookies with these browsers:

Internet Explorer: <https://support.microsoft.com/it-it/help/17442/windows-internet-explorer-delete-manage-cookies>

Microsoft Edge: <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy>

Safari: <https://support.apple.com/guide/safari/manage-cookies-and-website-data-sfri11471/mac>

Chrome: <https://support.google.com/chrome/answer/95647?hl=it-IT&hlrm=fr&hlrm=en>

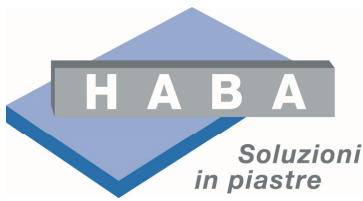
Firefox: <http://support.mozilla.org/it-IT/kb/enable-and-disable-cookies-website-preferences>

For further information about cookies and to manage your marketing cookie preferences, please visit <http://www.youronlinechoices.com>.

Below are the purposes of the processing of data collected by our website:

- Statistical purposes (analysis)

Collection of data and information exclusively in aggregated form in order to verify the correct functioning of the website. None of this information are related to the natural person-user, and do not allow his or her



HABA ServizioPiastre s.r.l. a socio unico
Sede Legale:
Via G. Pascoli, 7 – 24121 Bergamo
Sede Amministrativa/Commerciale/Produttiva:
Via Emilia, 27/29 – 24052 Azzano San Paolo (BG)

Uffici Commerciali:
Tel. 035-899190 – Fax 035-899167
<http://www.haba.it> email: info@haba.it

Uffici Amministrativi:
Te. 035-893020 – Fax 035-899924
Cod. Fisc. e Reg. Imprese di Bg n. 01779090123
P.Iva 02093610166 – R.E.A. n. 249182
Capitale Sociale: € 20.000 i.v.

identification. No explicit consent is required.

– Security

Collection of data and information in order to ensure the safety of the website (antispam filters, firewall, virus detection) and of the User and to prevent or discover fraud or abuse against the website. Data are automatically stored and may also include personal data (IP address) that could be used to block any attempt of damage to the website itself or other users, or harmful activities or constituting a crime. These data are never used to identify or profile the user and are erased periodically. No explicit consent is required.

- Secondary activities

Provide data to third parties to allow them to carry out technical and logistical activities or different activities on behalf of the Company. Suppliers have access only to the personal data required to carry out their tasks, and are engaged not to use data for other purposes and are obliged to process personal data in accordance with the present law.

Our website uses data mainly on the basis of the user consent. Consent is given through the banner placed on the bottom of the page, or through the use of the website – as a conclusive behaviour. By using or visiting the website the user approves the Privacy Policy and accepts the Processing of personal data with respect to the modalities and purposes described therein, including the potential dissemination to third parties if necessary to provide a service. Through the communication or demand for service forms, further consent related to the specific purpose of the services is collected.

Consent to collect and process data is optional. You can refuse to give consent or withdraw a previously given consent at any moment (using the banner placed at the bottom of the page or the cookie browsing settings). However, refusal of consent may prevent from providing some services and the browsing experience through the website may be compromised.

Taking into consideration the technical development of this topic and of the web tools designed for privacy reasons, the Company is committed to periodically update this document, which has to be considered as the Cookie Policy.

Last updated: 25 May 2018