

Website Privacy Policy

(Privacy Policy for <https://www.modulblok.com/>)

MODULBLOK S.p.A. (hereinafter also referred to as "**MODULBLOK**"), pursuant to Art. 24 of EU Regulation 2016/679 (hereinafter "**GDPR**"), acts as the **Data Controller** and, in implementation of Articles 13-14 of the GDPR, provides the following information.

General Information

Data subjects are informed of the following general profiles, applicable to all areas of processing:

- This disclosure is also valid for the purposes of Legislative Decree no. 196/2003 as amended by Legislative Decree 101/2018 (**Personal Data Protection Code**) and for the purposes of Art. 13 of EU Regulation no. 2016/679, concerning the protection of natural persons with regard to the processing of personal data and the free movement of such data, for individuals interacting with <https://www.modulblok.com/>;
- This notice is valid only for the domain https://www.modulblok.com and not for other websites that may be consulted by the user via links contained therein;
- Modulblok S.p.A. exercises no control over content and materials published by or obtained through third-party sites, nor over their methods of processing the user's personal data, and expressly disclaims any liability in such cases. The user is required to check the privacy policies of third-party sites accessed while browsing https://www.modulblok.com and to inform themselves about the conditions applied by third parties to the processing of their personal data;
- Specific short notices regarding specific processing activities (for example, following the completion and submission of a contact form) will be displayed on the pages of the https://www.modulblok.com site dedicated to particular services upon request;
- This disclosure may undergo changes due to the introduction of new regulations; therefore, the user is invited to check this page periodically.

Data Controller

- **Company Name:** Modulblok S.p.A.
- **VAT Number:** IT00812590305
- **Registered Office:** Via Vanelis, 6 Pagnacco (UD) 33010
- **Operational Headquarters:** Via Candoni, 5 Amaro (UD) 33020
- **Telephone Contact:** 0432-991711

- **Email Contact:** info@modulblok.it
- **Certified Email (PEC):** pec.modulblok@pec.modulblok.it

Data Processing

General Considerations Personal data processing is carried out using IT tools suitable for ensuring the security and confidentiality of the data, and in compliance with adequate security measures as required by **Art. 32 GDPR**, via secure communication protocols with SSL encryption algorithms. Personal data will be processed in accordance with the legislative provisions of the aforementioned regulations and the confidentiality obligations provided therein. Good practices considered include the Italian Data Protection Authority's "Guidelines on promotional activities and anti-spam" of July 4, 2013, the "Guidelines on personal data processing for online profiling" of March 19, 2015, and the "Guidelines on Automated individual decision-making and Profiling" - WP251, defined based on the provisions of Regulation (EU) 2016/679. All data of individuals we interface with are processed lawfully, fairly, and transparently, in compliance with the general principles set out in **Art. 5 of the GDPR**. Specific security measures are observed to prevent data loss, illicit or incorrect use, and unauthorized access, pursuant to **Art. 32 of the GDPR**.

Browsing Data The computer systems and software procedures used to operate this website acquire, during their normal operation, some 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 could, through processing and association with data held by third parties, allow users to be identified. This category of data includes IP addresses or domain names of computers used by users connecting to the site, URI (Uniform Resource Identifier) addresses of 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 (successful, error, etc.), and other parameters related to the user's operating system and IT environment.

Personal Data Voluntarily Provided Personal, identifying, and non-sensitive data include, for example, name, surname, tax code, VAT number, e-mail address, telephone numbers, residence address (hereinafter "personal data" or "data") which are directly provided by users when requesting registration for particular services offered by the site and/or the newsletter service and/or to formalize the purchase of goods or services potentially marketed in the e-commerce area of the site.

Summary Table of Obligations under Art. 13 GDPR

<p>Purpose and Legal Basis of Processing (GDPR-Art. 13, para. 1, letter c)</p>	<p>Browsing data is used solely to obtain statistical information on site usage and to monitor its correct functioning. Furthermore, the data may be used to ascertain liability in the event of hypothetical cybercrimes against the site (GDPR-Art. 6, para. 1, letter f).</p> <p>Personal data may be provided voluntarily by the user to obtain information on the services offered by the Controller and/or to join promotional offers and marketing initiatives that require the completion of registration forms (GDPR-Art. 6, para. 1, letter b).</p> <p>Certain data may be requested from the user for the issuance of tax documents (GDPR-Art. 6, para. 1, letter c).</p> <p>The optional, explicit, and voluntary sending of e-mail messages to the addresses indicated on the site involves the subsequent acquisition of the sender's e-mail address, which is necessary to respond to requests, as well as any other personal data included by the user in the communication (GDPR-Art. 6, para. 1, letter b).</p> <p>In the event that, through the site, the user decides to submit their CV for potential employment, the Controller may receive—in addition to the user's personal identifying data (e.g., name, surname, e-mail address, telephone number, educational background)—any contact details of third parties. By submitting their CV, the candidate may also provide data concerning their health status, information referring to other legal entities and/or natural persons, racial or ethnic origin, religious or philosophical beliefs, trade union membership, or sexual orientation. Such data is understood to be provided voluntarily and spontaneously by the user at the time of submitting the CV (GDPR-Art. 6, para. 1, letter a). A specific dedicated notice has been drafted for the processing of such data.</p>
<p>Scope of Communication (GDPR-Art. 13, para. 1,</p>	<p>Data may be processed exclusively by internal personnel, duly authorized and instructed in processing (GDPR-Art. 29), or by any entities responsible for the maintenance of the web platform, who are appointed</p>

letters e - f)	in such cases as External Processors (GDPR-Art. 28) . Data will not be communicated to other parties, disseminated, or transferred to non-EU countries. The server for the domain https://www.modulblok.com is hosted on servers located within the E.E.A. (European Economic Area).
Data Retention Period (GDPR-Art. 13, para. 2, letter a)	Browsing data is typically kept for short periods of time, is not stored in databases, and is periodically deleted if no longer necessary for the purposes of processing. Personal data voluntarily provided to request information or complete online purchases follows the retention obligations to which the Controller is subject for tax purposes and/or any extensions related to investigative activities. Any CVs received that are not deemed of immediate interest are deleted within six months of receipt.

Rights of Data Subjects

In relation to the personal data covered by this notice, the data subject has the right to exercise the rights provided by the EU Regulation as listed below:

- **Right of Access:** The right to be informed about the processing of one's personal data and potentially receive a copy (**Art. 15**).
- **Right to Rectification:** The right to correct inaccurate personal data (**Art. 16**).
- **Right to Erasure ("Right to be Forgotten"):** The right to have one's data deleted (**Art. 17**).
- **Right to Restriction of Processing:** In cases of unlawful processing or contestation of data accuracy (**Art. 18**).
- **Right to Data Portability:** The right to receive personal data in a structured format to transmit it to another controller (**Art. 20**).
- **Right to Object:** The right to object to the processing of personal data (**Art. 21**).
- **Right not to be subject to automated decision-making:** The right not to be subject to a decision based solely on automated processing (**Art. 22**).

Requests can be addressed to the Data Controller at the PEC address **pec.modulblok@pec.modulblok.it** using the form provided by the Italian Data Protection Authority (Garante), downloadable from our site or from the Garante's website. In case of an alleged violation, the user has the right to lodge a complaint with the **Garante per la Protezione dei Dati Personali**.

1. Cookies

Cookies are short fragments of text that allow the web server to store information on the client (the browser) to be reused during the same visit (session cookies) or later, even days later (persistent cookies). Cookies are stored, based on user preferences and the browser used, on the specific device being utilized (computer, tablet, smartphone).

Types of cookies potentially present on the site

CATEGORY	GOALS
Technical (Browsing/Session):	To ensure normal navigation and use of the site
Technical (Analytical):	To collect information on the number of visitors and pages viewed
Technical (Functionality):	To allow navigation based on selected criteria
Profiling	To create user profiles to send advertising messages in line with preferences

Preference Management.

In compliance with the "**Guidelines on cookies and other tracking tools**" issued by the Italian Data Protection Authority (Garante) on June 10, 2021, users can decide whether or not to accept the cookies present on the site by interacting with the dedicated banner. These settings can also be modified after the browsing session. The Site may contain links to other websites (so-called "third-party sites"). **Modulblok S.p.A.** does not access or exercise any control over cookies, web beacons, or other tracking technologies that may be used by third-party sites accessed by the user through the Site. Modulblok S.p.A. does not control the content or materials published by or obtained through third-party sites, nor their methods of processing the user's personal data, and expressly disclaims any liability in this regard. The user is responsible for checking the privacy policies of third-party sites accessed via the Site and for informing themselves about the terms applicable to the processing of their personal data.

Policy Updates

Please note that this disclosure may be subject to periodic revision, including in relation to relevant changes in legislation and case law. In the event of significant changes, appropriate notice will be displayed on the website's homepage for a reasonable period of time. Nevertheless, data subjects are encouraged to consult this policy periodically.

Modulblok S.p.a.

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