

PRIVACY POLICY

pursuant to Articles 13 of the GDPR

Website, apps and portals

Why this document is important

This document is of interest to you because it informs you of how and why we process your personal data.

This information only concerns processing carried out for the purposes specified below.

This information does not replace any specific information you may be given when you use other services provided by the Data Controller.

This document may be updated over time, so please check back periodically!

Data controller

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What are your rights?

Where provided by law, you have the right to access your data, request its rectification, and erasure. You also have the right to object to the processing of your data or request that its processing be restricted. You also have the right to data portability. Furthermore, you have the right to withdraw your consent to the Data Controller at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

In any case, if you have any questions or requests, please contact us; we'd be happy to hear from you!

As the Data Subject, you can exercise your rights and withdraw your consent by notifying us at the contact details indicated.

You can also file a complaint with the AEPD – Spanish Data Protection Agency (Agencia Española de Protección de Datos) for the protection of personal data or contact the judicial authority if you believe that the processing of your data is unlawful.

Why we can process your data (legal bases)

Any processing of personal data must be based on an appropriate legal basis.

Processing is lawful when:

contract: it is necessary to perform a contract to which the Data Subject is party or pre-contractual measures requested by the Data Subject

consent: the interested party expresses his/her consent in a free, specific, informed and unequivocal manner

legal obligation: it is necessary to fulfill a legal obligation to which the Data Controller is subject

legitimate interest: it is necessary to pursue the legitimate interest of the Data Controller or third parties

protection of vital interests: it is carried out to prevent serious and current dangers to the life of the interested party

public interest: it is necessary to carry out a task carried out in the public interest or in the exercise of official authority

Why we process your data (purpose)

Website, apps and portals

The Data Controller processes personal data to manage the website <https://www.marafatto.com/> and to allow navigation.

Legal basis: contract | legitimate interest

Providing data for this purpose is essential. If you do not provide them to us, we will not be able to provide the service or carry out the activity.

Requests received via email, contact form or other tools

The Data Controller processes personal data to manage requests received (via email or other available communication tools, such as contact forms, instant chats, or phone calls), to respond to requests, and to improve service delivery.

Legal basis: contract | legitimate interest

Providing data for this purpose is essential. If you do not provide us with your data, we will not be able to respond to your request.

CVs and job applications received through the website or other tools

The Data Controller processes personal data to manage the applications of those who apply spontaneously or simply submit a CV. This involves preparatory activities for establishing an employment relationship, such as: search, selection, assessment, and contact with the candidate.

Legal basis: contract | legitimate interest

Providing data for this purpose is essential. If you do not provide us with your data, we will not be able to process your application.

Reserved area

The Data Controller processes personal data to allow registration and access to the reserved area where you can manage and/or purchase the products and/or services offered and manage your profile settings. Furthermore, the data is processed to perform all operations related to the sale/management of products and services (e.g., product shipping, order management, etc.). The processing is also aimed at improving the service.

Legal basis: contract | legitimate interest

Providing data for this purpose is essential. If you do not provide us with your data, we will not be able to, in whole or in part, perform and fulfill our obligations, provide all the services, or transmit all the information to you.

Marketing and newsletter

If the interested party agrees, the Data Controller processes personal data for advertising and marketing purposes: these consist of sending newsletters, communications, notifications on new features, content, products, and services offered by the Data Controller and its partners (such as those with whom it collaborates in the provision of services or the sale of products).

Legal basis: consent

Consent is required for this purpose. You may withdraw your consent to data processing at any time by notifying us (opt-out). Failure to provide consent or subsequent withdrawal will prevent us from providing any related activities and services.

Tracking

The Data Controller processes browsing data to generate statistics on the use of the website/app/portal in order to track and monitor user behavior. The processing is also aimed at improving the service.

Examples of statistics generated by the Tracking process

most visited pages

use of services

number of visitors per day

number of visitors per time slot

geographical area of origin of visitors



Legal basis: consent

This is the activity carried out through analytics cookies and in some cases the law provides that the user's consent is not required: more information in the Cookie Declaration and in the Cookie Policy

Legitimate interest

Data subjects' data often need to be processed to perform tasks related to company operations, but which are not required by law or by the existing contract between the parties. This refers in particular to actions aimed at protecting company assets; verifying the quality of the company's work; verifying regulatory compliance; preventing fraud; conducting direct marketing; transferring data within a group for administrative purposes; recovering company debts; managing any disputes; and exercising or defending rights in litigation or prior to litigation.

Legal basis: legitimate interest

We never process your data based on legitimate interest if this could prejudice your rights and freedoms!

Obligations related to what we do and complying with the law

The Data Controller processes the data to perform activities related and instrumental to the performance of the contractual or pre-contractual relationship with third parties (e.g., administrative, management, tax, and accounting obligations; managing correspondence; issuing estimates; receiving orders; arranging appointments; providing information on the status of the activity; managing payments and invoicing).

Legal basis: contract | legal obligation | legitimate interest

The Data Controller also processes the personal data of the Data Subjects to fulfill the legal obligations (such as administrative, accounting, and tax) to which it is subject, to protect its rights, and to enable the exercise of the functions of judicial authorities.

Legal basis: legal obligation

Providing data for this purpose is essential.

Processing for this purpose is based on legitimate interest and legal obligation, so your consent is not required.

What data do we process?

Personal data

We process personal data, that is, any information relating to an identified or identifiable natural person.

Important

Your data is valuable: do not share data that is not necessary for your request, and do not share third-party data unless you have their consent to do so!

We may also become aware of your sensitive data that you voluntarily share with us (such as: health, genetic, or biometric data; trade union membership; political opinions; philosophical or religious beliefs; ethnic or racial origin; sexual life and orientation).

Examples of personal data we process:

identification data and contact details Name and surname; tax code; place and date of birth; nicknames; telephone number, email address, residence, domicile, abode, registered office; username and password to access the systems that the Data Controller makes available to the Data Subject (company devices; e-commerce and reserved areas; websites and apps)

work data: employer; characteristics of the employment relationship (start date, classification, qualification, job description, level, type of working hours, etc.); remuneration paid or received, contributions paid or received; training and certifications; suitability for the job and any limitations

navigation data IP addresses or domain names of computers and terminals used by users; URI/URL addresses of requested resources; time of request, method used to submit the request to the server and size of the file obtained in response; numeric code indicating the status of the response given by the server (successful, error, etc.); parameters relating to the user's operating system and IT environment

Browsing data

The computer systems and software procedures that operate this site, during their normal operation, acquire some personal data whose transmission is implicit in the use of Internet communication protocols.



This data is necessary to use the site's services and is used anonymously to obtain statistical information on site usage and to monitor its proper functioning. Once processed, it is automatically deleted (except where required by judicial authorities to investigate criminal offenses).

Examples of browsing data

IP addresses or domain names of computers and terminals used by users

URI/URL addresses of the requested resources

time of the request, method used to submit the request to the server and size of the file obtained in response

numeric code indicating the status of the response given by the server (successful, error, etc.)

parameters relating to the user's operating system and computing environment

Web usage statistics

The Owner uses Google Analytics to generate statistics on website usage. All user IP addresses are anonymized as soon as they are received from the network and before being stored or processed.

Examples of statistics generated by Google Analytics

most visited pages

use of services

number of visitors per day

number of visitors per time slot

geographical area of origin of visitors

Cookies and other tracking tools

Like almost all websites, this site uses cookies and similar technologies.

Cookies are short strings of programming code that are installed on the device (computer, smartphone, tablet) of the user who visits the site to improve the browsing experience (during the visit to the site and subsequent ones) by automating certain procedures and to analyze how the site is used.

There are other technologies that collect information on the use of services, user behaviour and choices (e.g. tracking pixels): for simplicity, in this document we refer to cookies and these other technologies generically as [Tracking Tools](#).

For all the specific information on this site's Tracking Tools (what they are and how long they are stored), you can refer to the [Cookie Policy](#) and the [Cookie Declaration](#).

These are technical and complex issues: if you have any questions or requests, please contact us; we'll be happy to hear from you!

Where we get your data (sources)

We process the data that you share directly with us (optionally, explicitly and voluntarily) using various channels (such as when you call or write to us, when you interact with our social profiles or when you use our website or app) and the data that you have made public.

We also process data present in public registers, lists, and other public sources (e.g., balance sheets and other information from the Company Register at the Chamber of Commerce; real estate deeds, mortgage registrations, and other so-called prejudicial documents; mass media and websites accessible to anyone).

Who we share your data with

We share data with internal members of our organization involved by virtue of their assigned tasks and specifically charged with processing (such as: subordinate and freelance workers; interns, volunteers, temporary workers; partners, investors, directors; consultants and collaborators).

We may share data with third parties, external to our organization, who help us carry out our work and achieve the indicated purposes. These parties operate as independent data controllers or as external data processors: contact us if you want to know who they are!

With the interested party's consent, the data may be disclosed.



Examples of data recipients

Public Administrations, Public Bodies and entities, including private ones, with functions of public importance, to the extent that the conditions established by the legislation are met

External consultants and professionals (such as lawyers, accountants, labor consultants and data processing centers, DPO, RSPP, freelancers, journalists, coaches) partners, directors, other persons with corporate functions; auditing firms

organizations of our business group or entities connected to the same central body to which we are connected

social networks and other digital platforms (such as systems for managing video conferences or file exchange)

entities that manage the operation of the website, app, and in general of the company's IT systems and telecommunications networks (e.g., web agencies; providers of cookies and other tracking tools; newsletter providers; software houses; web providers; hosting providers)

entities that provide communications assistance and consultancy (e.g., market research aimed at determining the level of satisfaction with the quality of services and the activities performed, telemarketing, etc.)

marketing agencies, communications agencies, copywriters, printers or other entities that provide services related to the communication and promotion of the company

How long we keep your data

We retain data for the minimum time necessary to achieve the purposes.

In particular:

1. CVs and job applications received via the website or other tools: we retain the data for a maximum of 1 year
2. Marketing and newsletter: we retain data as long as the interested party agrees.
3. Profiling: we retain data as long as the interested party agrees

Longer only if necessary to comply with legal obligations, fulfill orders given by Public Authorities, or pursue a legitimate interest (such as exercising or defending a right in court)

If your consent is required (e.g., for marketing purposes), we process your data for as long as you agree. You can withdraw your consent to data processing at any time by notifying us (opt-out), but in that case we may no longer be able to provide you with certain activities and/or services.

How we process your data

We adopt appropriate security measures to protect your data and carry out the processing required by law: collection, recording, organization, storage, consultation, processing, use, modification, selection, extraction, limitation, communication, deletion and destruction of data.

Transfer of data abroad

If necessary to achieve the indicated purposes, we may transfer your data to non-EU countries that guarantee a level of personal data protection deemed adequate by the European Commission, or in any case on the basis of other appropriate guarantees such as the Standard Contractual Clauses adopted by the European Commission.

Essential Glossary

Personal data: any information relating to an identified or identifiable natural person)

Diffusion: providing data to unspecified parties, in any form, including by making it available or consulting it. For example, posting a photo online or on a social network.

DPOData Protection Officer, whose duties also include that of intermediary between the Data Controller and the Data Subject)

Interested: natural person to whom the personal data refers)

Data controller: who determines the purposes and means of the processing)

Treatments: any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means.