

## **UPDATED ON 02/10/2025**

This policy has been drafted and tailored for visitors to the [www.pa-etl.it](http://www.pa-etl.it) website. This document cancels and replaces in its entirety the document previously published on privacy and cookies.

## **COOKIE POLICY**

### **WEBSITE INFORMATION PURSUANT TO ARTICLE 13 OF EUROPEAN REGULATION 2016/679 (GDPR)**

Specific summary information is progressively reported or displayed on the pages of the website dedicated to particular services on request that provide forms for data collection. We also inform you that, in order to provide a complete service, our website may contain links to other websites not managed by PA SPA (hereinafter also referred to as PA or Data Controller). PA SPA is not responsible for errors, content, cookies, publication of illegal content, advertising, banners or files that do not comply with current regulations and for compliance with privacy regulations by websites not managed by the Data Controller.

PA SPA, as the Data Controller of your personal data pursuant to and for the purposes of Article 13 of European Regulation 2016/679, hereby informs you that the aforementioned regulation provides for the protection of data subjects with regard to the processing of personal data and that such processing will be based on principles of correctness, lawfulness and transparency and the protection of your privacy and your rights. The information and personal data you provide or otherwise acquire when using the website will be processed in accordance with the provisions of the aforementioned legislation and the confidentiality obligations set forth therein.

### **DATA SUBJECTS AND RETENTION PERIOD**

#### **A) users (visitors) of the website [www.pa-etl.it](http://www.pa-etl.it)**

During navigation, the computer systems and software procedures used to operate the Website acquire certain personal data whose transmission is implicit in the use of Internet communication protocols, such as, for example, the IP addresses or domain names of the computers and terminals used by users, the URI/URL (*Uniform Resource Identifier/Locator*) addresses of the resources requested, the time of the request, the size of the file obtained and other parameters relating to the user's operating system,

For more information, please refer to the cookie policy available on the website

### **METHOD OF PROCESSING PERSONAL DATA**

Your personal data will be processed manually, electronically and/or telematically, in accordance with the procedures set out in Articles 6 and 32 of the GDPR and by adopting the appropriate security measures provided for.

### **RECIPIENTS OF PERSONAL DATA AND DISCLOSURE OF DATA**

Your data will be processed by appropriately appointed personnel and may be processed by third parties belonging, by way of example, to the following categories:

- external parties providing cloud services;

- technical support service providers;
- group companies providing IT system management services, including server hosting and backup services.

The subjects belonging to the above categories operate, in some cases, as data processors specifically appointed by the Data Controller in accordance with Article 28 of the GDPR, and in other cases in complete autonomy as separate data controllers, it being understood that, in the latter case, the communication of your personal data to these independent data controllers is carried out solely for the purposes indicated in this policy.

The complete list can be requested by writing to the Data Controller's contact details.

Your data will not be disclosed.

### **TRANSFER OF PERSONAL DATA:**

Your data is stored in countries belonging to the European Union. Only data processed by cookies will be transferred to countries outside the European Union, as indicated in the cookie policy of the companies that provide services related to third-party cookies. For further information, please write to [privacy@pa-etl.it](mailto:privacy@pa-etl.it).

### **DATA CONTROLLER**

The Data Controller is PA SPA, with registered office in Via Milano, 13 - 42048, Rubiera (RE), Italia, +39 0522 623612, [privacy@pa-etl.it](mailto:privacy@pa-etl.it), in the person of its pro-tempore legal representative.

You have the right to obtain from the Data Controller the erasure (right to be forgotten), restriction, updating, rectification, portability and opposition to the processing of your personal data, and in general you may exercise all the rights provided for in Articles 15, 16, 17, 18, 19, 20, 21 and 22 of European Regulation 2016/679 by writing to [privacy@pa-etl.it](mailto:privacy@pa-etl.it).

You also have the right to lodge a complaint with the Supervisory Authority

### **RIGHTS OF DATA SUBJECTS**

EU Regulation 2016/679: Articles 15, 16, 17, 18, 19, 20, 21, 22 - Rights of the Data Subject

1. The data subject has the right to obtain confirmation of the existence or otherwise of personal data concerning him/her, even if not yet recorded, and its communication in intelligible form and the possibility of lodging a complaint with the Supervisory Authority.

2. The data subject has the right to obtain information on:

- a) the origin of the personal data;
- b) the purposes and methods of processing;
- c) the logic applied in the case of processing carried out with the aid of electronic instruments;
- d) the subjects or categories of subjects to whom the personal data may be communicated or who may become aware of it in their capacity as designated representative in the territory of the State, managers or personnel authorised to process personal data.

3. The data subject has the right to obtain:

- a) the updating, rectification or, when interested, integration of the data;
- b) the 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;
- c) certification that the operations referred to in letters a) and b) have been brought to the attention, also as regards their content, of those to whom the data have been communicated or disseminated, except in the case where this proves impossible or involves a use of means manifestly disproportionate to the protected right;
- d) data portability.

4. The data subject has the right to object, in whole or in part:

- a) on legitimate grounds, to the processing of personal data concerning him/her, even if they are relevant to the purpose of the collection;
- b) to the processing of personal data concerning him/her for the purpose of sending advertising or direct sales material or for carrying out market research or commercial communication.