

Narda Safety Test Solutions S.r.l.

Privacy and Cookie Policy

This Privacy Policy is intended to describe the purposes and modalities through which Narda Safety Test Solutions S.r.l., acting as Controller (“**Company**” or “**Controller**”), collects and processes the personal data related to the user (“**User**”) who interacts with the website [www.narda-sts.it] (“**Site**”) and with the various services offered by it.

The information contained in this Privacy Policy is provided pursuant to Article 13 of Regulation (EU) 679 of 27 April 2016 (“**Regulation**”), as well as pursuant to the applicable domestic rules and regulations and the Measures issued by the Data Protection Authority and the Guidelines of European Authorities.

The information about the processing of personal data is disclosed exclusively for the Site and the processing carried out by the Company, but not for the processing operations carried out by third parties through other websites the User may visit through a link. The Company shall not be liable for such additional processing operations, as the User has to refer to the individual Privacy Policies of third party websites.

1. Controller and place of the processing

The Controller is Società Narda Safety Test Solutions S.r.l., with offices in Via Benessea, 29/B - 17035 Cisano sul Neva (SV).

The data are prevalently processed at the Controller’s office, by the technical staff of the Company appointed as person in charge of the processing, within the territory of the European Union and, in relation to the services entrusted to, or offered by, third parties, also outside the Italian State and/or the European Union. In the case of transfer of the data to Countries that do not ensure standards of protection equal to Italy’s, the Company undertakes to take all the measures necessary for such transfer.

2. Modalities to process the data

The Company shall process the User’s data by adopting all the appropriate security measures intended to prevent any unauthorised access, as well as the unauthorised disclosure, modification, or destruction of the data. The data shall be processed both with manual and computer and/or telecommunication means, with organisational modalities and logics strictly connected with, and limited to, the specified purposes.

3. Purposes and legal basis of data processing

The Company, through the Site, may process the data of the User for the following purposes:

- a. **Purposes connected with the collection of applications through the “Work with us” section.**
The Company shall give the User the chance to send their applications to work for Narda Safety Test Solutions S.r.l. by email. For this purpose, the Company shall acquire and use the personal information provided by the User exclusively for the purpose of selecting and managing applications. However, Users are required to refrain from including in their resume and/or in the data disclosure form, any sensitive data (relating for example, without limitation, to their state of health, political opinions, and sexual life), apart from those that are strictly necessary pursuant to law for the purposes of selecting and assessing resumes (for example, the fact of belonging to categories enjoying special protection).
- b. **Contacting the Company** The Company shall give the User the chance to send notices to the Company, in addition to questions and requests for information on the Company’s activities, initiatives,

and services. To this subject, the personal data disclosed by the User (for example, email address, possible telephone number and/or other information spontaneously provided to the User) shall be processed by the Company to receive, correctly manage, and answer the User's communications. The legal basis of the processing is represented by the performance of the service expressly requested by the User, and any refusal to provide the personal data shall cause the impossibility for the Company to manage and answer the notice or request for information.

- c. **Sending promotions and other newsletters and notices**, by email to the address supplied by the User, in connection with services offered by the Company that are similar to those already provided to the User. In these cases, the User's consent is unnecessary, but the same may at any time object to the processing. To enable the User to easily object to the sending of promotional communications, any notice related to such services shall give the User the chance to reject additional similar communications.

The legal basis of the processing of the User's data for such purposes is represented by the legitimate interest of the Company in sending the User informational notices and updates related to services similar to those used by the User and potentially interesting them, pursuant to recital no. 47 of the Regulation.

- d. **Disclosure of the data to the Company's distributors for marketing purposes**. In the context of requests for contact to the Company, the User may freely express, by selecting the appropriate tick box, their consent to the use of personal and contact data entered by them (for example, email address) for the purpose of disclosing the data to the Company's distributors, who may send the User their own marketing communications, such as newsletters, invitations to take part in events, informational and promotional material on services and/or offers, both through automated means (e.g., email, SMS) and traditional means (e.g., ordinary mail, telephone calls with operator). In this case, the legal basis of the processing is the consent expressed by the User, who may freely choose whether or not to consent to this notice: as a matter of fact, giving consent for this purpose is an absolutely optional choice of the User that shall in no way prevent the use of the Company's services and of the Site. The User may object to the sending of notices and revoke their consent, even partially for individual channels of communication, by contacting the individual distributors.

- e. **Pursuance of the legitimate interests of the Company and/or third parties**. The User's data may also be used for the exercise of the rights and legitimate interests of the Company and/or third parties, for example, the right of defence in court, the management of complaints and situations of litigation, the recovery of receivables, fraud prevention and/or unlawful activities. In these cases, even if the disclosure of the personal data of the User is not compulsory, it is in any case necessary in that such data are strictly connected and expedient to the pursuance of the said legitimate interests, which do not prevail on the fundamental rights and freedoms of the User, and any refusal to disclose them could cause the impossibility to provide the services required (for example, requesting information to the Company).

- f. **Fulfilling legal obligations and/or applicable obligations**. The Company may also use the personal data disclosed by the User or otherwise acquired during the interaction of the User with the Site for purposes related to the fulfilment of legal obligations, regulations, domestic and EU legislation, and purposes resulting from provisions issued by authorities empowered to do so by law, which represent the legal basis of the processing, without the need to obtain the prior consent of the User.

- g. **Performing aggregate statistics on an anonym basis** in order to improve the performances and services offered by the Company through the Site. In this case, no consent shall be required of the User, in that the processing specified shall be carried out exclusively on anonym data.

4. Categories of data to be processed

The Company shall receive and collect, through the Site, information related to the Users who visit the pages of the Site and use the web services available thereon. In particular, the Company shall acquire and process the following information.

4.1 Data collected through surfing and cookies

When the User visits the Site, the latter shall collect some data such as the pages viewed, the links or the buttons clicked by the User, the date and time of access, the User's IP address, the surfing browser, and the operating system used (so-called "*surfing data*"). The surfing data could, by their very nature, enable the identification of the User also through elaborations and associations with data stored by third parties. However, the Company shall use these data for the sole purpose of obtaining statistical and anonym information on the use of the Site for purposes strictly connected with the operation thereof. The surfing data could also be used to ascertain liability in the case of computer crimes that damage the Site. Secondly, in relation to the collection of data of the User through similar cookies and technologies, read the **Cookie Policy**.

4.2 Data voluntarily supplied by the User

The Company shall limit the collection of the information voluntarily provided by the User to the information necessary to pursue the purposes illustrated in paragraph 3 above and the services expressly requested. Moreover, the Company may collect and process additional personal data, if the same have been voluntarily disclosed by the User within the services offered by the Site, for example in the case in which the User contacts the Company to report failures or malfunctioning, exercise their rights on data processing, etc. Such data shall be processed by the Company exclusively for the purposes strictly connected to the User's request. The failure to disclose the data may cause the impossibility to obtain the service required.

5. Disclosure of data to third parties

The data supplied by the User and those collected by the Site within the relevant services (for example, IP address) shall not be disclosed and may be notified, for the purposes and modalities illustrated in this Privacy Policy, to the categories of parties indicated below:

- companies of the Group, for administrative-accounting purposes, for the pursuance of legitimate interests of the Company and/or third parties, and for the purpose of performing the services expressly requested by the User;
- companies, consultants, advisors or independent contractors of whom/which the Company avails itself for the performance of technical or organisational duties (such as, for example, providers of IT services), or with whom/which the Company cooperates (including the other Companies of the Group), in order to provide and operate their services, or for any communication activities;
- distributors of the Company, subject to prior consent and for the purposes specified in paragraph 3(d);
- natural persons, companies, or professional firms that provide the Company with assistance and advisory services or activities, especially, but not exclusively, with reference to accounting, administrative, legal, tax, and financial issues;
- parties whose right to access the data is provided for by legal provisions or orders of the relevant authorities.

The parties belonging to the categories indicated above shall use the data in their capacity as independent data controllers pursuant to law or as data processors duly appointed by the Company.

Such parties may be based in EU Member States or non-EU Countries. In particular, in the case that such parties are based in non-EU Countries, the Company shall adopt the measures provided for by the Regulation to legitimate the transfer of the personal data to them, including the execution of specific Data Transfer Agreements that incorporate the standard privacy protection clauses approved by the European Commission.

The list of the persons to whom the data are or may be disclosed, as well as the details of the privacy measures adopted to legitimate data transfers outside the EU, may be requested to the Company by contacting the persons specified in the “Rights of Data Subjects and Contact Persons” section.

6. Storage of personal data

The Data shall be processed for as long as it is necessary for the performance of the activities indicated in paragraph 3 above, and they shall be erased when the purposes for which they have been collected and processed do not apply any longer.

In particular, the Company shall erase the personal data of the User who has asked for information or sent communications by contacting the Company through the Site 12 months after disclosure thereof. Secondly, the Company shall erase the personal data of the User who has sent their application in connection with jobs offered by the Company 24 months after disclosure thereof, in the case in which the applicant fails to enter into an employment/professional relationship with the Company.

Finally, the data collected for the marketing purposes of the Company shall be stored until the cancellation of registration / objection of the User, after which they shall be stored in anonym form for analysis and statistical purposes.

7. Rights of the User and contact persons

The User may exercise the rights provided for by the Regulation in the cases expressly provided for by law and where applicable. In particular, Users shall have the right to:

- request confirmation as to whether or not your personal data are being processed and, in this case, request from the controller access to the information related to the same processing (for example, purposes, categories of data processed, intended recipients, or categories of intended recipients of the data, the storage period, etc.);
- right to request from the controller the rectification of inaccurate or incomplete data;
- right to request from the controller the erasure of the data (for example, if the personal data are no longer necessary for the purposes for which they have been collected, in the case of revocation of the consent on which the processing is based, etc.);
- request the restriction of the processing (e.g., in the event that the User challenges the accuracy of the data; if the processing is unlawful and the User objects to the erasure of personal data; if the data are necessary to exercise or defend in court one of the User’s rights, even if the controller no longer needs them; in the event that the right to object is exercised, for the time necessary to verify the existence of legitimate grounds).
- receive the data concerning the User in a commonly used and machine-readable format (for example, PDF), and transmit them to another controller, or obtain the transmission of those data directly from one controller to another, if technically possible (so-called data portability).

Moreover, the User shall also have the right to object in whole or in part to the processing of the personal data regarding them, on legitimate grounds, also for marketing purposes (including for individual channels).

Such rights may be exercised directly by sending a notice to the following email address:

nardait.privacy@L3T.com

Finally, if the User deems that the processing of the data disclosed is in breach of data protection provisions, the User shall have the right to file a complaint with the Italian Data Protection Authority (www.garanteprivacy.it).

8. Collecting data through Cookies

A cookie is a small string of text that the websites visited send to the browser of the User's computer, where they are stored when the latter visits an Internet website, and are then re-transmitted to the same sites on the occasion of the next visit.

Cookies are used by the Company to operate the Site or improve performance.

The Site uses cookies for technical purposes only: the technical cookies are used in that they are strictly necessary for the technical operation of the Site and to provide the service expressly requested by the User (for example, language setting, etc.).

8.1 Technical cookies

Technical cookies are fundamental to enable the User to surf the Site and use its functionalities, remember User's preferences (for example, language, country of origin, etc.), distribute requests on more servers, remember when the User consents to certain options (for example, by accepting the use of certain cookies to remove the informative banner), in order to enable the User to view contents and videos through Adobe Flash Player. Such cookies shall last for 12 months and do not require the User's consent.

8.2 Disabling cookies through the browser

The User may remove from its browser the cookies set by the Site through the browser's settings.

Most of surfing browsers are set to accept cookies. However, the User may set their browser in such a way as to restrict the number of cookies accepted or block all the cookies, changing the browser settings as follows:

Microsoft Internet Explorer

Click on the "Tools" icon in the top corner on the right and select "Internet Options". Select "Privacy" in the pop-up window. Here the User may change the cookies settings.

Google Chrome

Click on the "wrench" icon in the top corner on the right and select "Settings". At this point, select "Show advanced settings" and change the "privacy" settings.

Mozilla Firefox

From the menu button in the top corner on the left, select "Options". Select "Privacy" in the pop-up window. Here the User may change the cookies settings.

Safari

From the menu button in the top corner on the right, select "Preferences". Select "Security" and there the User may change the cookies settings.

However, it is pointed out that by disabling the use of all the cookies on the Site (including technical cookies) some functionalities will be compromised.

8.3 Additional information related to the cookies

The www.allaboutcookie.org Site contains the instructions to manage the cookies on the most common browsers; alternatively, it is possible to consult the documentation attached to the software used on their device.

9. Changes to the Privacy and Cookie Policy

The Company reserves the right to make changes to this Privacy Policy at any time, giving notice thereof through publication on the Site. We ask the User to check such updates on the Site.

If the changes were particularly significant and/or their impact on the User's rights were substantial, the Company may notify the User of such changes also through other modalities (for example, by sending an email).

*Privacy and Cookie Policy as at **25 May 2018***