

Tigieffe srl - Privacy Policy

Data Controller

Tigieffe Srl is the data controller, based in Via Villa Superiore, 82 in Luzzara 42045 (RE). In accordance with EU Regulation 2016/679 we hereby provide the following information regarding the processing of personal data of users of the www.airo.com portal and associated services.

Controller's email address: info@airo.com

Types of Data collected

Consultation of the portal may, for technical reasons, lead to the processing of data relating indirectly or directly to the user.

Personal Data collected by this site, independently or through third parties, include: Cookies, usage Data, first name, last name, email, phone number, company name, country, city.

Full details of each type of data collected are provided in the dedicated sections of this privacy policy or by means of specific information texts displayed before data collection. Personal Data may be freely provided by the User or, in the case of Usage Data, automatically collected during the use of this Application.

Unless otherwise specified, all Data requested by this Application are mandatory. If the User refuses to disclose them, it may be impossible to provide the Service. In cases where this website/application indicates certain Data as optional, Users are free to refrain from disclosing such Data, without this having any consequence on the availability of the Service or on its operation.

Browsing data: this is technical information acquired automatically by the computer system during consultation, through communication protocols; this information is used only to obtain anonymous statistical information on the use of the portal and to check its operation and is not associated with identifiable users, however it may allow indirect identification of the user through the association with data held by third parties.

Data for the use of online services: these are the user's personal data required to carry out their registration and computer authentication in the reserved area of the portal and allow the use of the relative services. In order to make a purchase on the website, further information may also be requested, such as the data relating to the means of payment used and the data for the shipment of the products and any invoicing. The provision of such data is optional but necessary in order to be able to use the services requested.

Contact data submitted through the contact forms on the website for advertising, commercial and informational purposes. Such data will be used only in the case where the specific consent is given by the data subject.

Users who might have doubts about which Data are mandatory are encouraged to contact the Data Controller (info@airo.com).

Any use of Cookies - or other tracking tools - by this portal or by the controllers of the third-party services used by this Application, unless otherwise stated, has the purpose of providing the

Service requested by the User, in addition to the other purposes described in this document and in the Cookie Policy, if available.

No data of a sensitive nature (e.g. on revealing racial or ethnic origin, religious, philosophical or political beliefs, state of health, sex life, etc.) or of a judicial nature (data relating to criminal records or relating to the status of defendant or investigator, etc.) are required.

The User assumes responsibility for the Personal Data of third parties obtained, published or shared through this Application and guarantees that they have the right to disclose or disseminate them, releasing the Controller from any responsibility towards third parties.

Place and methods of processing of Data collected

Processing methods

The Data Controller takes appropriate security measures to prevent unauthorised access, disclosure, modification or destruction of Personal Data.

The processing is carried out by computer and/or telematic tools, with organisational methods and logics strictly related to the purposes indicated.

In addition to the Data Controller, in some cases other subjects involved in the organisation of Tigieffe Srl (administrative, commercial, marketing, legal staff, system administrators, partners, members of the board of directors or other administrative body and in any case the Processor designated by Tigieffe Srl) or external subjects, by way of example but not limited to, such as third-party technical service providers, mail carriers, hosting providers, IT companies, communication agencies, parent, subsidiary, associated and/or affiliated companies, may have access to the Data. These will also be appointed, if necessary, as Data Processors by the Controller. Your Personal Data may therefore be communicated to suppliers, contractors, subcontractors, banking and/or insurance institutions or other subjects and/or bodies that provide on behalf of Tigieffe Srl for the management and/or maintenance of the websites and electronic and/or telematic tools used by the Data Controller and for the dispatch of informative communications regarding the processing status of orders forwarded online, if specific consent has been given by those in charge of commercial and marketing activities.

The complete list of Data Processors pursuant to article 28 of the GDPR is available at the registered office of Tigieffe Srl. and can be accessed by making a specific request to info@airo.com.

This policy may be subject to updates. Tigieffe Srl therefore invites Users who wish to learn about the methods of processing personal data collected to visit this page periodically.

Legal basis of processing

The Data Controller processes Personal Data relating to the User if one of the following conditions is met:

- the User has given consent for one or more specific purposes; Note: in some jurisdictions, the Controller may be authorised to process Personal Data without the User's consent or another of the legal bases specified below, until the User opts out of such processing. However, this does not apply where the processing of Personal Data is governed by European legislation on the protection of Personal Data;

- the processing is necessary for the performance of a contract with the User and/or the execution of pre-contractual measures;
- the processing is necessary to fulfil a legal obligation to which the Controller is subject;
- the processing is necessary for the performance of a task of public interest or for the exercise of official authority the Controller is endowed with;
- the processing is necessary for the pursuit of the legitimate interest of the Controller or of third parties.

The processing of the aforementioned personal data of the user for the purposes of browsing and for the use of online services is necessary and instrumental to the use of online services; it is therefore necessary for the performance of a contract to which the data subject is party or for the performance of pre-contractual measures taken at the request of the same. For this reason, the processing does not require the consent of the data subject. The processing of personal data for contact purposes submitted through the forms is optional and subject to the granting of your consent.

However, it is always possible to ask the Controller to clarify the concrete legal basis of each processing operation and in particular to specify whether the processing is based on the law, required by a contract or necessary to conclude a contract.

Place

The Data are processed at the operating headquarters of the Data Controller and in any other place where the parties involved in the processing are located. For further information, please contact the Controller.

User's Personal Data may be transferred to a country other than the one where the User is located. For further information on the place of the processing, the User can refer to the section on details of the processing of Personal Data.

The User has the right to obtain information on the legal basis for the transfer of Data outside the European Union or about an international organisation under public international law or formed by two or more countries, such as the UN, as well as on the security measures taken by the Data Controller to protect the Data.

The User can check whether one of the transfers described above takes place by examining the section of this document relating to the details of the processing of Personal Data or by asking the Controller for information by contacting them at the contact details given in the section entitled "data controller".

Storage period

The Data are processed and stored for the time required by the purposes for which they were collected. Therefore:

- Personal Data collected for purposes related to the performance of a contract between the Data Controller and the User will be stored until the performance of such contract is completed.
- Personal Data collected for purposes related to the legitimate interest of the Controller will be stored until such interest is satisfied. The User may obtain further information on the legitimate interest pursued by the Controller in the relevant sections of this document or by contacting the Controller.

When processing is based on the User's consent, the Controller may keep the Personal Data for longer until such consent is withdrawn. In addition, the Controller may be obliged to store Personal Data for a longer period in compliance with a legal obligation or by order of an authority.

All personal data of the users of the portal are processed with the aid of computer tools in a lawful and correct manner for the fulfilment of the above-mentioned purposes and are protected by suitable security measures that guarantee their confidentiality, integrity, accuracy, availability and updating and, in any case, stored for a period of time not exceeding that necessary for the purposes for which they were collected or subsequently processed.

At the end of the storage period, the Personal Data will be deleted. Therefore, at the end of this period, the right of access, cancellation, rectification and the right to data portability can no longer be exercised.

Place and methods of processing of the collected Data

The User's Data are collected to enable the Controller to provide the Service, comply with legal obligations, respond to requests or enforcement actions, protect their rights and interests (or those of Users or third parties), detect any malicious or fraudulent activities, and for the following purposes: Statistics, Contacting the User, Interaction with social networks and external platforms, Managing contacts and sending messages, Displaying content from external platforms, Interaction with data collection platforms and other third parties and Tag management.

To obtain detailed information on the purposes of the processing and on processed Personal Data for each purpose, the User may refer to the following section "Details of the processing of Personal Data".

Details of the processing of Personal Data

Personal Data are collected for the following purposes and using the following services:

Contacting the User

Contact form

By filling in the contact form with his or her own Data, the User consents to their use to respond to requests for information, quotes, or any other type of requests indicated by the header of the form.

Personal Data processed: city; last name; email; country; first name; phone number; company name.

Mailing list or newsletter

By registering to the mailing list or newsletter, the User's email address is automatically inserted in a list of contacts to which email messages containing information, also of a commercial and promotional nature, relating to this Application may be transmitted. The User's email address may also be added to this list as a result of registering to this Application or after making a purchase.

Personal data processed: email.

Managing contacts and sending messages

This type of service allows the management of a database of email contacts, telephone contacts or contacts of any other type used to communicate with the User.

These services may also allow the collection of data about the date and time of the User's displaying of messages, as well as the User's interaction with them, such as information about clicks on links in messages.

Mailchimp (The Rocket Science Group, LLC.)

Mailchimp is an address management and emailing service provided by The Rocket Science Group, LLC.

Personal data processed: email.

Place of processing: United States - specific privacy policy: <https://mailchimp.com/legal/privacy/>

Tag management

This type of service is functional for the centralised management of the tags or scripts used on this Application. The use of such services involves the flow of User Data through them and, where applicable, their retention.

Google Tag Manager (Google Ireland Limited)

Google Tag Manager is a tag management service provided by Google Ireland Limited.

Personal data processed: Usage Data.

Place of processing: Ireland - specific privacy policy: <https://policies.google.com/privacy>

Interaction with data collection platforms and other third parties

This type of service allows Users to interact with data collection platforms or other services directly from the pages of this Application in order to save and reuse data.

If one of these services is installed, it is possible that, even if Users do not use the service, the service will collect Usage Data relating to the pages where it is installed.

Widget Mailchimp (The Rocket Science Group, LLC)

The Widget Mailchimp allows you to interact with the Mailchimp email address management and message delivery service provided by The Rocket Science Group LLC.

Personal data processed: email.

Place of processing: United States - specific privacy policy: <https://mailchimp.com/legal/privacy/>

Interaction with social networks and external platforms

This type of service allows you to interact with social networks or other external platforms directly from the pages of this Application. The interactions and information acquired by this Application are in any case subject to the User's privacy settings for each social network. This type of service may still collect traffic data for pages where the service is installed, even when Users do not use it. It is recommended that the User disconnects from the respective services to ensure that the data processed on this Application is not linked back to the User's profile.

Google+ +1 Button and social widgets

The Google+ +1 button and social widgets are interaction services with the Google+ social network, provided by Google Inc.

Personal data processed: Cookies; Usage Data.

Place of processing: United States and/or Ireland - specific privacy policy: <https://policies.google.com/privacy>

Linkedin button and social widgets (LinkedIn Corporation)

The LinkedIn button and social widgets are interaction services with the LinkedIn social network, provided by LinkedIn Corporation.

Personal data processed: Cookies; Usage Data.

Place of processing: United States - specific privacy policy: www.linkedin.com/legal/privacy-policy

Facebook Likes and social widgets (Facebook, Inc.)

The Facebook 'Like' button and social widgets are interaction services with the Facebook social network, provided by Facebook, Inc.

Personal data processed: Cookies; Usage Data.

Place of processing: United States – specific privacy policy: www.facebook.com/privacy/explanation

Tweet button and Twitter social widgets (Twitter, Inc.)

The Tweet button and Twitter social widgets are interaction services with the social network Twitter, provided by Twitter, Inc.

Personal data processed: Cookies; Usage Data.

Place of processing: United States - specific privacy policy: <https://twitter.com/it/privacy/>

Statistics

The services contained in this section allow the Data Controller to monitor and analyse traffic data and serve to keep track of the User's behaviour.

Google Analytics with anonymised IP (Google Ireland Limited)

Google Analytics is a web analysis service provided by Google Inc. ('Google'). Google uses the Personal Data collected in order to track and examine the use of this Application, compile reports and share them with other services developed by Google.

Google may use Personal Data to contextualise and personalise ads of its advertising network. This Google Analytics integration makes your IP address anonymous. Anonymisation works by shortening the IP address of Users within the borders of the member states of the European Union or in other countries that are members of the to the EEA Agreement. Only in exceptional cases will the IP address be sent to Google's servers and shortened within the United States.

Personal data processed: Cookies; Usage Data.

Place of processing: Ireland - specific privacy policy: <https://policies.google.com/privacy>

Google Analytics

Google Analytics is a web analysis service provided by Google Inc. ('Google'). Google uses the Personal Data collected in order to track and examine the use of this Application, compile reports and share them with other services developed by Google.

Google may use Personal Data to contextualise and personalise ads of its advertising network.

Personal data processed: Cookies; Usage Data.

Place of processing: United States and/or Ireland - specific privacy policy: <https://policies.google.com/privacy>

The user's consent is not required for the installation of technical or analytics cookies, but it is always possible to disable their use, by selecting the appropriate setting through the browser commands used by the user or just to disable analytics cookies, by installing the opt-out add-on provided by Google Inc

Browser add-on to disable Google Analytics: [https:// tools.google.com/dlpage/gaoptout?hl=it](https://tools.google.com/dlpage/gaoptout?hl=it)

To learn about and disable profiling cookies on the Website, please refer to: <http://www.youronlinechoices.com/it/>

Displaying content from external platforms

This type of services makes it possible to display contents hosted on external platforms directly from the pages of this Application and to interact with them.

This type of service may still collect web traffic data relating to the pages where the service is installed, even when users do not use it.

Google Maps widget (Google Ireland Limited)

Google Maps is a map display service operated by Google Ireland Limited, which allows this Application to integrate such content into its pages.

Personal data processed: Usage data; Tracking tool.

Place of processing: United States and/or Ireland - specific privacy policy: <https://policies.google.com/privacy>

Google Fonts (Google Ireland Limited)

Google Maps is font style display service operated by Google Ireland Limited, which allows this Application to integrate such content into its pages.

Personal data processed: Usage Data; various types of Data as specified by the privacy policy of the service.

Place of processing: United States and/or Ireland - specific privacy policy: <https://policies.google.com/privacy>

User rights

Users may exercise certain rights with respect to the Data processed by the Controller. In particular, the User is entitled to:

- **withdraw consent at any time.** The User may withdraw consent to the processing of their Personal Data previously expressed.
- **object to the processing of his or her Data.** The User may object to the processing of his or her Data when it takes place on a legal basis other than consent. Further details on the right to object are given in the next section.
- **access their Data.** The User has the right to obtain information on the Data processed by the Controller, on certain aspects of the processing and to receive a copy of the Data processed.
- **verify and request rectification.** The User may check the accuracy of his or her Data requesting their updating or correction.

- **obtain the restriction of processing.** When certain conditions are met, the User may request the restriction of the processing of his or her Data. In this case, the Data Controller will not process the Data for any purpose other than their storage.
- **obtain the deletion or removal of his or her Personal Data.** When certain conditions are met, the User may request the deletion of his or her Data by the Data Controller.
- **receive their Data or have them transferred to another data controller.** The User has the right to receive his or her Data in a structured, commonly used and machine-readable format and, where technically feasible, to have them transferred without hindrance to another data controller. This provision is applicable when the Data are processed by automated means and the processing is based on the User's consent, on a contract to which the User is a party or on contractual measures related to it.
- **propose a complaint.** The User may lodge a complaint to the competent data protection enforcing authority or take legal action.

The data subject may therefore assert the rights set out in Articles 15, 16, 17, 18, 20 and 21 EU Regulation 2016/679 and in particular has the right to obtain from the Data Controller confirmation of the existence or otherwise of his or her personal data, their updating, rectification or, if he or she has an interest in doing so, their integration, erasure, transformation into an anonymous form or blocking in whole or in part of those processed in breach of the law and portability of the personal data provided.

Details of the right to object

When Personal Data are processed in the public interest, in the exercise of public powers the Controller is endowed with or in pursuit of a legitimate interest of the Controller, Users have the right to object to the processing for reasons connected to their particular situation.

Users are reminded that if their Data are processed for direct marketing purposes, they may object to the processing without giving any reason.

How to exercise rights

To exercise the User's rights described in the preceding paragraph, Users may address a request to the contact details of the Controller or by e-mail info@airo.com. Requests are filed free of charge and processed by the Controller as soon as possible, in any case within one month.

Cookie Policy

This site uses Tracking Tools. For more information, the User may consult Tigieffe srl's Cookie Policy.

Further information on processing

Legal defence

The User's Personal Data may be used by the Data Controller in court or in the preparatory phases for its possible establishment for defence against abuses in the use of this Application or of the related Services by the User. The User claims to be aware that the Data Controller may be obliged to disclose the Data by order of public authorities.

Specific information

At the User's request, in addition to the information contained in this privacy policy, this Application may provide the User with additional and contextual information regarding specific Services, or the collection and processing of Personal Data.

System logs and maintenance

For operational and maintenance purposes, this Application and any third-party services used by it, may collect system logs, i.e. files recording interactions and which may also contain Personal Data, such as the User's IP address.

Information not contained in this policy

Further information in relation to the processing of Personal Data may be requested at any time to the Data Controller by e-mail info@airo.com.

Response to "Do Not Track" requests

This application does not support 'Do Not Track' requests.

To find out whether any third-party services used support them, the User is invited to consult the respective privacy policies indicated in the preceding paragraphs.

Changes to this privacy policy

Tigieffe srl reserves the right to make changes to this privacy policy at any time by notifying Users on this page and, if technically and legally feasible, by sending a notification to Users through one of the contact details in its possession. Therefore, please consult this page frequently, referring to the date of last modification indicated at the bottom.

If the changes affect processing whose legal basis is consent, the Controller will collect the User's consent again, if necessary.

Definitions

Personal Data (or Data)

Personal data is any information which, directly or indirectly, even in conjunction with any other information, including a personal identification number, makes a natural person identified or identifiable.

Usage Data

This is the information collected automatically through this Application (also from third-party applications integrated into this Application), including: IP addresses or domain names of the computers used by the User who connects with this Application, URI (Uniform Resource Identifier) addresses, 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 from the server (successful, error, etc.), the country of origin, the characteristics of the browser and of the operating system used by the visitor, the various temporal connotations of the visit (e.g. the time spent on each page) and the details of the itinerary followed within the site, with particular reference to the sequence of pages consulted, the parameters relating to the operating system and the User's IT environment.

User

The individual who uses this site and related services which, unless otherwise specified, coincides with the Data Subject.

Data Subject

The natural person to whom Personal Data relate.

Data Processor (or Processor)

The natural, legal person, public administration and any other entity that processes personal data on behalf of the Controller, as set out in this privacy policy.

Data Controller (or Controller)

The natural or legal person, public authority, service or other entity which, individually or jointly with others, determines the purposes and means of the processing of personal data and the tools adopted, including the security measures relating to the operation and use of this Application. The Data Controller, unless otherwise specified, is the controller of this Application.

This Application

The hardware or software tool by which Users' Personal Data are collected and processed.

Service

The Service provided by this Application as defined in the relevant terms (if any) on this website/application.

European Union (or EU)

Unless otherwise specified, any reference to the European Union contained in this document shall be deemed to extend to all current member states of the European Union and the EEA.

Cookies

Cookies are Tracking Tools consisting of small pieces of data stored within the User's browser.

Tracking Tool

A Tracking Tool is any technology - e.g. Cookies, unique identifiers, web beacons, embedded scripts, e-tags and fingerprinting - that allows Users to be tracked, for example by collecting or storing information on the User's device.

Legal references

This privacy policy is drawn up on the basis of current legislation, including Articles 13 and 14 of Regulation (EU) 2016/679.