



## PRIVACY POLICY GDPR

Dear user,

HORENTEK Srl protects the confidentiality of personal data and guarantees them the necessary protection from any event that could put them at risk of violation.

As required by the European Union Regulation n. 679/2016 (the so-called "GDPR"), and in particular to art. 13, implemented in Italy with Legislative Decree 10 August 2018, n. 101, which amends the previous Legislative Decree no. 30 June 2003, n. 196, below we provide the user ("Interested") with the information required by the aforementioned rules, relating to the processing of their personal data.

This information is provided not only to comply with the legal obligations regarding the protection of personal data provided for by the regulations in force, but also because we believe that the protection of personal data is a fundamental value of our business and we want to provide you with any information that can help you. to protect your privacy and to control the use made of your data in relation to the browsing experience on our site.

### SECTION I.

#### Who we are and what data we process

HORENTEK Srl, with registered office in Livorno, Via Aurelio Nicolodi 43 Int. 5, in the person of its Legal Representative, operates as Data Controller and Data Processor; can be contacted at [info@horentek.it](mailto:info@horentek.it) and receives and collects the information provided by the interested party through the appropriate information request page, present on our website.

The personal data processed are the so-called "common" data and concern personal data such as name and / or surname, e-mail address and any other personal data reported by the interested party in the text, in the information request form.

HORENTEK Srl does not require the interested party to provide so-called "particular" data, or, according to the provisions of the GDPR (Article 9), personal data that reveal racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as genetic data, biometric data intended to uniquely identify a natural person, data relating to the health or sexual life or sexual orientation of the person. In the event that the service requested of HORENTEK Srl requires the processing of such data, the interested party will receive specific information in advance and will be asked to give specific consent.

### SECTION II

#### For what purposes do we need the data of the interested party (Article 6, section 1 (b) of the GDPR)

The data of the interested party will be processed for:

#### a) requests for contact and / or information material

The processing of the personal data of the interested party will take place to carry out the management of requests for information and contact and / or to send information material, as well as for the fulfillment of any other obligation deriving from it.

The legal basis of these treatments is the fulfillment of the services inherent to the request for information and contact and / or the sending of informative material and compliance with legal obligations.

#### b) the management of the contractual relationship

The processing of the personal data of the interested party will take place to carry out the preliminary activities and consequent to the purchase of a Service and / or a Product and the management of the related order.

The legal basis of these treatments is the fulfillment of the services inherent to the contractual relationship and compliance with legal obligations.

c) promotional activities / communications in general on Services / Products similar to those purchased by the interested party (Recital 47 GDPR)

The data controller, even without your explicit consent, may use the contact details communicated by the interested party, for the purpose of direct sales of their Services / Products, limited to the case in which they are Services / Products similar to those covered by the request (unless the interested party explicitly objects).

#### [Recipients or categories of recipients of personal data \(Article 13 paragraph 1 \(e\) and \(f\) of the GDPR\)](#)

The communication of the personal data of the interested party takes place mainly towards third parties and / or recipients whose activity is necessary for the performance of the activities inherent to the established relationship and to respond to certain legal obligations, such as:

CATEGORIES OF RECIPIENTS	PURPOSE
Company managers of data processing	Management of the requests of the interested party, including the sending of informative material.  Processing and transmission of the data of the interested party to the designated acoustic center.
Designated Acoustic Center (Horentek supplier)	Services related to the collected request.  Sending information material.
IT infrastructure support and maintenance service providers	Maintenance of the electronic communication infrastructure connected to the requested service.  Management of the Horentek website and its database of contact requests.

The processing of the data of the interested party by the aforementioned subjects will take place as Data Processors designated by the Data Controller, in compliance with the security measures provided.

The Data Controller does not transfer personal data to countries where the GDPR is not applied (non-EU countries) except for specific needs connected with the request, for which the interested party will be informed in advance and specific consent will be requested.

### SECTION III

[What happens if the interested party does not provide his data identified as necessary for the purposes of the execution of the requested service?](#)

The collection and processing of personal data is necessary to follow up on the requests specified by the interested party. If the interested party does not provide the personal data indicated in the form, the Data Controller will not be able to follow up on the treatments or the requests described.

[How we treat the data of the interested party](#)

The Data Controller arranges for the use of adequate security measures in order to preserve the confidentiality, integrity and availability of the data subject's personal data and imposes similar security measures on the Data Processors (including third party suppliers).

[Where we process the data of the interested party \(Article 13, point 1 \(f\) of the GDPR\)](#)

The personal data of the interested party may be stored in paper and / or computer archives, located within the EU.

[How long are the data of the interested party kept? \(Article 13, point 2 \(a\) of the GDPR\)](#)

Unless he explicitly expresses his will to remove them, the personal data of the interested party will be kept as long as they are necessary with respect to the legitimate purposes for which they were collected, and in any case no later than a maximum period of 12 (twelve) months. of its inactivity.

The cases in which the rights deriving from the request are to be asserted in court are reserved, in which case the personal data of the interested party, exclusively those necessary for these purposes, will be processed for the time necessary for their pursuit.

[What are the rights of the interested party? \(Article 13 par. 2 \(b\) of the GDPR\)](#)

The interested party has the right to obtain from the data controller the following:

a) confirmation as to whether or not personal data concerning him is being processed and, in this case, to obtain access to personal data and the following information:

1. the purposes of the processing;
2. the categories of personal data in question;
3. the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular if they are recipients of third countries or international organizations;
4. when possible, the retention period of the personal data envisaged or, if not possible, the criteria used to determine this period;
5. the existence of the right of the interested party to ask the data controller to correct or delete personal data or limit the processing of personal data concerning him or to oppose their treatment;
6. the right to lodge a complaint with a supervisory authority;
7. if the data are not collected from the interested party, all available information on their origin;
8. the existence of an automated decision-making process, including profiling, and, at least in such cases, significant information on the logic used, as well as the importance and expected consequences of such processing for the data subject.
9. the adequate guarantees provided by the third country (non-EU) or an international organization to protect any data transferred.

- b) the right to obtain a copy of the personal data being processed, provided that this right does not affect the rights and freedoms of others;
- c) the right to obtain from the data controller the correction of inaccurate personal data concerning him without undue delay;
- d) the right to obtain from the data controller the cancellation of personal data concerning him without undue delay, if the reasons provided for by the GDPR in art. 17, including, for example, in the event that they are no longer necessary for the purposes of the processing or if this is assumed to be illegal and the conditions provided for by law are always present and in any case if the processing is not justified by another equally legitimate reason;
- e) the right to obtain from the data controller the limitation of the processing, in the cases provided for in art. 18 of the GDPR, for example where the interested party has contested its accuracy, for the period necessary for the Data Controller to verify its accuracy. The interested party must also be informed, in a reasonable time, of when the suspension period has been completed or the cause of the limitation of the processing has ceased, and therefore the limitation itself has been revoked;
- f) the right to obtain communication from the owner of the recipients to whom the requests for any corrections or cancellations or limitations of the processing carried out have been transmitted, unless this proves impossible or involves a disproportionate effort.
- g) the right to receive personal data concerning him in a structured format, commonly used and readable by an automatic device and the right to transmit such data to another data controller without impediments by the data controller to whom he provided them , in the cases provided for by art. 20 of the GDPR and the right to obtain the direct transmission of personal data from one data controller to another, if technically feasible.

For any further information and in any case to send your request, please contact the Data Controller at [info@horentek.it](mailto:info@horentek.it). In order to ensure that the aforementioned rights are exercised by the interested party and not by unauthorized third parties, the Data Controller may request the same to provide any additional information necessary for the purpose.

#### [How and when can the interested party oppose the processing of their personal data? \(Art. 21 GDPR\)](#)

For reasons relating to the particular situation of the interested party, the same may object at any time to the processing of their personal data if it is based on legitimate interest or if it occurs for direct marketing activities, by sending the request to the Data Controller at [info@horentek.it](mailto:info@horentek.it).

The interested party has the right to have their personal data deleted if there is no legitimate overriding reason for the Data Controller with respect to the one that gave rise to the request, in the event that the personal data are no longer necessary for the purposes for which they were collected or otherwise processed and in any case in the event that the interested party has opposed the processing for direct marketing activities.

#### [Right to limitation of treatment and complaint? \(Art. 18 GDPR\)](#)

Without prejudice to any other administrative or judicial action, if the interested party considers that the Data Controller has not operated in accordance with the provisions of the applicable legislation, he can obtain from the Data Controller the limitation of the processing of his personal data and submit a complaint. to the competent supervisory authority on the Italian territory (Guarantor Authority for the protection of personal data) or to the one that carries out its duties and exercises its powers in the Member State where the violation of the GDPR has occurred.

## SECTION IV

### COOKIES

#### General information, deactivation and management of cookies

Cookies are data that are sent from the website and stored by the Internet browser on the user's computer or other device (for example, tablet or mobile phone). Technical cookies and third-party cookies may be installed from our website or its subdomains.

Cookies are short text files that are downloaded to the User's device when visiting a website. At each subsequent visit, the cookies are sent back to the website that originated them (first-party cookies) or to another site that recognizes them (third-party cookies). Cookies are useful because they allow a website to recognize the User's device. They have different purposes such as, for example, to allow you to navigate between pages efficiently, to remember your favorite sites and, in general, to improve the browsing experience. They also help to ensure that the advertising content displayed online is more targeted to the User and his interests. Based on the function and purpose of use, cookies can be classified into technical cookies, profiling cookies, third-party cookies.

The present Site does exclusively use from cookies technicians And cookies from third set off.  
a) Technical cookies

Technical cookies are those whose use does not require the consent of the User. Among these technical cookies, we point out the essential cookies, also called "strictly necessary (strictly necessary) or functionality", which enable functions without which it would not be possible to fully use the Site. These cookies are used exclusively by HORENTEK and are therefore cookies of first part. A cookie of this type is also used to memorize the User's decision on the use of cookies on the Site. The technical cookies also include those used to statistically analyze accesses or visits to the site, also called "analytics", that pursue exclusively statistical purposes (but not also of marketing or profiling) and collect information in aggregate form without the possibility of tracing the identification of the individual user. These cookies can be disabled and / or deleted through the browser settings.

b) Third party cookies

During navigation, the User may also receive cookies from different sites or web servers on his terminal (so-called "third-party" cookies): this happens because the Site may contain elements such as, for example, images, maps, sounds, specific links to web pages of other domains that reside on servers other than the one on which the requested page is located. In other words, these cookies are set directly by website managers or servers other than the website itself. These third parties could theoretically set cookies while you visit the Site and thus obtain information relating to the fact that you have visited a website of the Company. If the User decides not to grant authorization for the use of third-party cookies, through the settings of the navigation browser,

#### List of all cookies, technical and third-party, used by this site

Below is the complete list of cookies used by the site [www.horentek.it](http://www.horentek.it), so that the interested party can know all the characteristics, in particular the name, the purposes of use, the type and storage times, the domain of origin with indication of any third parties and the purpose.

Table 1: list of technical and third-party cookies used by the Site

First name	Purpose of use	Guy	Duration	Domain (Third part)	Purpose
_ga	Technical	Persistent	24 months	. horentek.it	Google Analytics
_gat	Technical	Persistent	24 months	horentek.it	Google Universal Analytics
_icl_current_language	Technical	Persistent	1 day	www.horentek.it	WordPress multilingual plugin from POLYLANG
cookie_notice_accepted	Technical	Persistent	1 month	www.horentek.it	cookies Management informative

Below is the list of third parties that use cookies through this Site with the link to the Privacy Policy provided by the Third Party so that the interested party can view it.

Table 2: link to third party information

Google (DoubleClick, Youtube)	<a href="https://www.google.it/intl/it/policies/privacy/?fg=1">https://www.google.it/intl/it/policies/privacy/?fg=1</a>
Twitter	<a href="https://twitter.com/privacy?lang=it">https://twitter.com/privacy?lang=it</a>
Facebook	<a href="https://www.facebook.com/policy.php">https://www.facebook.com/policy.php</a>
Linkedin	<a href="http://it.linkedin.com/legal/cookie-policy?trk=hb_ft_cookie">http://it.linkedin.com/legal/cookie-policy?trk=hb_ft_cookie</a>

#### How to manage cookies (blocking, selective management and deletion of cookies)

the interested party can express their options regarding the use of cookies through the browser settings. By changing the browser settings you can accept or reject cookies or decide to receive a warning message before accepting a cookie from the website visited. Furthermore, cookies can be deleted periodically by deleting the contents of the "cookie" folder used by the browser.

Since each browser is different from another, it is advisable to check the procedures for changing the preferences relating to cookies in the specific browser guide. Please refer to the instructions of your browser to refuse all cookies or to exclude only some of them.

#### How to manage only third-party cookies

In order to deny consent to third-party cookies, the interested party must block the application of the cookies indicated in Table 1 for which the "Domain" does not contain the word "horentek.it" and is indicated as "Third party" , through the settings of the browser with which you browse the Site, using the "domain" of the cookie and following the instructions specified above. Some browsers also allow the total blocking of all third-party cookies. If you block all or part of the Site's cookies, navigation is not precluded, but it will not be possible to fully use its functions and applications.