



## Privacy Policy for [www.metalwork.es](http://www.metalwork.es) website visitors

This Privacy Policy has the objective of describing the procedures adopted for managing this [www.metalwork.es](http://www.metalwork.es) website, with regard to the processing of personal data of users/visitors consulting it.

This policy disclosure is provided only for the aforementioned website and not for any other websites consulted by the user via specific links.

Metal Work Iberica S.A. guarantees compliance with the law on the protection of personal data (Italian Legislative Decree 196/03 and European Regulation 2016/679/EU). All users/visitors are therefore invited to read this Privacy Policy carefully before submitting any personal information and/or filling in any electronic form on the site itself.

### Data Controller

The Data Controller is Metal Work Iberica S.A., with registered office at Pol. Ind. Can Magí c/Can Magí, 9 - 08210 Barberà del Vallès (Barcelona) España - Telf. 937 180 244, email: [metalwork@metalwork.es](mailto:metalwork@metalwork.es).

In addition, any partner's websites that from time to time take part in data processing activities on their own can take on the role of independent data controllers.

### Scope

#### 1) Browsing data

The computer systems and software procedures used to operate this website acquire, during normal operation, certain personal data which is then implicitly transmitted when using Internet communication protocols.

This is information which by its very nature could, through the processing and association with data held by third parties, allow users to be identified (e.g. IP addresses, domain names of computers used by users/visitors connecting to the websites, etc.).

This data is used solely for the purpose of acquiring statistical information and to verify the correct functioning of the website.

The data acquired on web contacts is not stored, however, for more than seven days, except for any investigations of cybercrimes against the website.

No data deriving from the web service will be disclosed or disseminated.

#### 2) Data voluntarily provided by users/visitors

If users/visitors connecting to this website send their personal data to access certain services or to make requests via e-mail, they are aware that this involves the acquisition by the Data Controller of the sender's address and/or any other personal data that will be processed solely for the purpose of responding to the request or for the provision of the service.

Personal data provided by users/visitors will be disclosed to third parties only should this be necessary to fulfil the requests of said users/visitors or for legal obligations (e.g. billing).

#### 3) Cookies

In addition to data expressly provided to the Data Controller, other data may be recorded as a result of browsing the website by the user: when the user accesses it, a "cookie" can be sent to the user. A cookie is a small text file that the website automatically sends to the user's computer when our pages are viewed. Cookies are used to facilitate browsing the website, obtain information on each user browsing inside the

website and allow proper fruition of some services that require identification of the user in order to know which areas of the website have been visited.

Regardless of the presence of a "cookie", for any access to the website, our website records the type of browser (e.g. Internet Explorer, Chrome, Firefox), the operating system (e.g. Windows, Macintosh) and the host and the URL from the user-navigator, in addition to the data entered in the request page. This data may be used in aggregate and anonymous form for statistical analysis on the use of the website. For the complete management of cookies, please refer to the Cookie Policy page of this website.

### **Processing methods**

Processing is performed using automated tools (e.g. electronic procedures and media) and/or manually (e.g. on paper) for the time strictly necessary to achieve the purposes for which the data was collected and, in any case, in compliance with applicable legislation.

### **Processing purposes**

In addition to the purposes specified in each disclosure preceding the filling out of the registration forms provided in the various sections of the website, the purposes of the processing by the Data Controller are to be understood as:

- a) the collection, storage and processing for the purposes of the establishment and operational and administrative management of the contractual relationship connected with the provision of the service offered on the website;
- b) the use of the user's personal data (namely the email address) to establish communications relating to the performance of the contractual relationship;
- c) the processing of personal data provided and those obtained from browsing the website in order to provide a service consistent with the information transmitted during the use of the service;
- d) the collection, storage and processing of data to perform statistical analyses in an anonymous and/or aggregate form;
- e) purposes connected with the conduction of our business, including the offering of personalised contents, such as newsletter services;
- f) the communication of commercial information on future initiatives, the announcement of new products or services;
- g) market surveys, statistical and economic analyses;
- h) the sending of advertising or promotional material, and the execution of games with prizes and promotional campaigns in general.

### **Legal basis of the processing**

The legal basis of the processing of customer data by the Data Controller via the [www.metalwork.es](http://www.metalwork.es) website is the agreement stipulated with the Data Subjects and the legitimate interest is to be found in the free economic initiative envisaged in article 41 of the Constitution as to any additional purposes requiring consent, which shall be considered an equally valid legal basis.

### **Recipients**

In addition to the Data Controller, data may also be accessed by categories of managers involved in the organisation of the website (administrative, sales and marketing employees, legal consultants and system managers). The Data Controller may also entrust third parties (e.g. independent technical service providers,



hauliers, hosting provider, cloud services, computer companies, communication agencies), which can be appointed as External Data Processors.

The updated list of Managers can be obtained at all times from the Data Controller, by sending a request to the address specified above.

### **Transfer to a third country**

For the services offered by the website, the Data Controller uses servers situated in the following countries:

- Italy  
and hence, according to European Regulation 2016/679/EU, they are deemed suitable as they operate within the EU.

Data processed by Metal Work Iberica S.A. will never be disseminated.

### **Place of data processing**

Data associated with web services in this website are processed at the headquarters of the Data Controller only by the technical staff of the Department in charge of processing. In case of need, the data related to the newsletter service can be processed by in-house Data Centre operators (responsible for data processing under article 29 of the Italian personal data protection code) at the company's headquarters.

### **Data storage time and place**

The data are processed for the time necessary to render the service requested by the User and then destroyed by safe means of destruction, such as paper shredders and computer data wiping.

### **Optional and mandatory nature of the provision of data**

Except for that specified for browsing data that automatically acquire data, users/visitors are free to provide their personal data. Failure to do so may only involve the impossibility to obtain what is requested.

### **Rights of data subjects**

The subjects to whom personal data refers have the right, at any time, to obtain confirmation of the existence or otherwise of said data and to know its content and source, verify its accuracy or request its integration, updating or rectification, pursuant to the GDPR.

They also have the right to obtain information concerning the following aspects from the Data Controller:

1. confirmation of existence or otherwise of personal data concerning them, communication of the same in an intelligible form, their source and the logic on which the processing is based;
2. cancellation, within a reasonable time, transformation into anonymous form of data concerning them or blocking of data processed in violation of law;
3. updating, rectification or, when interested, integration of data;
4. certification that the operations pursuant to points 2) and 3) above have been brought to the attention of those to whom the data has been communicated, unless this requirement proves to be impossible or involves a manifestly disproportionate use of resources compared to the right protected.
5. Customers have the right to obtain the correction or deletion of the concerning them or the limitation of processing.
6. Customers also have the right to revoke the consent to optional processing not relating to the execution of the agreement entered into with the Data Controller.



7. Customers also have the right to object, for legitimate reasons, to the processing of personal data concerning them, even if relating to the purpose of collection, to request the portability, to exercise the right to withdraw and to contact the Supervisory Authority for the protection of personal data for any violations they claim to have suffered, which for Spain is the Agencia Española de Protección de Datos, by Tel 901 100 099 - 912 663 517, or mail, based in C/ Jorge Juan, 6. 28001 – Madrid, or <https://www.aepd.es/index.html>.

#### **Automated decision-making processes**

No automated decision-making processes are carried out on aggregate data collected, unless they are aimed at better management of the website.

#### **Final clauses**

Please uncheck the consent box on the statement form in another section of this website to express your consent to the use of your personal data upon receiving information, communications on future events and newsletters from Metal Work Iberica S.A..

Given the current state of evolution of the legislation on personal data protection, we inform you that this privacy policy is subject to updates.

May 2018.