

## Privacy Policy - Terms & Condition

### Information for the interested party in relation to the processing of personal data pursuant to the European Regulation on the protection of personal data 2016/679

We inform you, in your capacity as an interested party, in accordance with the art. 13 of the European Regulation G.D.P.R. on the protection of personal data 2016/679 that the personal data you provide and those that you will provide us in the future will be treated by us according to the current legislation and registered on paper and/or electronic form, in compliance with the confidentiality obligations.

Personal data processing means any operation or set of operations, carried out even without the aid of electronic tools, concerning: collection, registration, organization, storage, consultation, processing, modification, extraction, selection, comparison, use, interconnection, blocking, communication, dissemination, deletion and destruction of data even if not recorded in a database.

1) The aforementioned personal data will be processed lawfully, correctly and transparently in accordance with articles 5 and 6 of the GDPR European Regulation 2016/679 and limited to the reciprocal obligations deriving from contractual relationships and the consequent legal obligations, as well as, to carry out an effective administrative management of existing relationships established with You. The processing will take place both through paper archives and through the use of electronic tools for which C.R. TECHNOLOGY SYSTEMS SPA has taken steps to adopt the Security Measures provided by the European Regulation 2016/679 regarding the protection of personal data and further measures to ensure that the treatment is carried out in safe conditions. The data collected will be communicated to our trusted tax consultancy firm, to companies connected to us for purposes strictly related to the contract and the service you have accepted and to fulfil legal obligations. Processing of data for this purpose is compulsory and any refusal to provide the requested data and/or not to authorize the processing of data may result in the objective impossibility for our company to observe the legal obligations and related contractual obligations.

2) Personal data may also be processed to send newsletters and advertising material and to make it aware of the new products/services that may be offered to You by our company.

3) The company name and personal data may be published and then distributed on our website or on promotional brochures as a reference.

4) Personal data may be communicated to Group companies, to Foreign Companies connected to us and to Service Companies with which C.R. TECHNOLOGY SYSTEMS SPA has a collaboration relationship for contractual, commercial, promotional and advertising purposes.

C.R. TECHNOLOGY SYSTEMS SPA has verified the correct application of the GDPR European Regulation 2016/679 of these companies and the adhesion of Codes of Conduct or standard contractual clauses according to the provisions of articles 44 and 45 of the GDPR European Regulation 2016/679; 5) Use of cookies: visiting our website [www.crtsgroup.com](http://www.crtsgroup.com) you can browse the pages anonymously and have access to some information without revealing your identity. In order to access the services reserved for customers, we use temporary "cookies" to allow safe browsing.

The cookie consists of a reduced set of data transferred to your browser by a web server and can only be read by the server that made the transfer. Therefore, it works as an identity card, recording passwords and user profile. This is not executable code and does not transmit viruses. Almost all browsers are initially programmed to accept cookies. You can set your browser to alert you when you receive a cookie, allowing You to choose whether to accept it or not. However, for those Web pages that require authorization, cookies are not optional. Users who choose not to receive cookies will therefore not be able to access the services reserved for customers.

## Types of Cookies

### Strictly Necessary Cookies

These cookies are essential in order to enable you to move around the website and use its features, such as accessing the various secure areas of the website. Without these cookies some necessary services, such as filling out a form for a competition, cannot be provided.

### Performance Cookies

These cookies collect information about how visitors use a website, which are the most visited pages, and if you receive error messages from web pages. These cookies do not collect information that identifies a visitor. All information these cookies collect is aggregated and therefore anonymous. It is only used to improve the functioning of a website. By using our website, you agree that these cookies can be installed on your device.

### Cookies of functionality

Cookies allow the website to remember the choices made by the user and provide advanced, more personal features. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customize. They can also be used to provide services that you have asked for, such as watching a video or commenting on a

blog. The information these cookies collect can be set anonymously, thus they cannot track your browsing activity on other websites.

### **Cookies profiling third parties**

Third party analytic cookies are used to detect information about user behaviour. The survey takes place anonymously, in order to monitor the performance and improve the website usability. Cookies profiling third parties are used to create profiles related to users, in order to propose advertising messages in line with the choices made by users. The use of these cookies is governed by the rules established by the third parties themselves, therefore, user is invited to view the privacy policies and directions to manage or disable cookies posted on the relevant web pages.

### **Navigation Cookies**

The computer systems and software procedures used to operate the website acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols. This information is not collected to be associated with identified interested parties, but for those whose very nature could, through processing and association with data held by third parties, allow users to be identified.

This category of data includes IP addresses or domain names of the computers used by users connecting to the site, the URL notation addresses of the requested resources, the time of the request, the method used to submit the request to the server, the file size obtained in response, the numeric code indicating the status of the response given by the server and other parameters related to the operating system and the user's computer environment.

This data is used only to obtain anonymous statistical information on the use of the website and to check its correct functioning and it is deleted immediately after processing. The data could be used to ascertain responsibility in case of hypothetical computer crimes against the website.

### **The following cookies are used on this site:**

Profiling cookies and analytic cookies of third parties for marketing and re-marketing activities, or for analyzing the user behaviour through the services provided by:

- Google Ads: for marketing and remarketing campaigns;
- Microsoft Clarity: for user profile tracking purposes

Moreover, we use LinkedIn and Twitter social network platforms.

For further information it is necessary to consult the specific Privacy Policy of the services provided by aforementioned Third parties:

- Google Ads at the following link: <https://policies.google.com/technologies/cookies>
- Microsoft Clarity at the following link: <https://privacy.microsoft.com/it-it/privacystatement>
- LinkedIn, at the following link: <https://www.linkedin.com/legal/cookie-policy>
- Twitter, at the following link: <https://twitter.com/en/privacy>

"Navigation" or "session" cookies (i.e cookies that are not stored permanently on the user's computer and disappear when the browser is switched off). These cookies avoid the use of other more invasive computer techniques for users and do not allow the acquisition of personal identification data of the user; You can choose at any time to disable or accept cookies by configuring your browser. To manage the use of cookies, select the appropriate setting on your browser.

Below are links that explain how to manage cookies for the most popular browsers:

- Internet Explorer™: <http://windows.microsoft.com/it-IT/windows-vista/Block-or-allow-cookies>
- Google Chrome™: <https://support.google.com/chrome/answer/95647?hl=it&hlrm=en>
- Mozilla Firefox™: <https://support.mozilla.org/it/products/firefox> Apple Safari™: <http://www.apple.com/it/support>

The processing of the data referred to in points 2 and 3 is to be considered optional; any refusal to provide it and/or to process it will have no effect on the existing contract but will not allow us to inform you about the new opportunities that our company can offer you.

We also inform you that pursuant to the GDPR European Regulation on the protection of personal data 2016/679 articles 7,12,13,15,16,17,18,19,20,21 you have the right to access, know, update, rectify, modify, block, transfer, delete all your data, the right to complain and to exercise all the remaining rights to the aforementioned articles, by sending an email to [privacy@crtsgroup.com](mailto:privacy@crtsgroup.com) or by registered letter R/R to C.R. Technology Systems S.p.A. Via Rossaro, no. 9 24047- Treviglio (BG).

The data will be processed throughout the entire duration of the established contractual relationships and also subsequently until the fulfillment of all legal obligations in compliance with the methods indicated in the G.D.P.R. European Regulations on the protection of personal data.

The Data Controller is C.R. Technology Systems S.p.A. Via Rossaro, no. 9 24047- Treviglio (BG)



# NEWSLETTER PRIVACY POLICY

INFORMATION ON THE PROCESSING OF PERSONAL DATA IN RELATION TO THE NEWSLETTER SERVICE PURSUANT TO ART. 13-14 of the GDPR (GENERAL REGULATION ON DATA PROTECTION) 2016/679

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## Data processing legal base and purpose

According to the guidelines of the General Data Protection Regulation (GDPR) valid from May 25 2018, we hereby inform you that you are receiving our Newsletter because you have been included in a special list, that we use only to send to our contacts news about our projects, activities and events.

You can be part of the list because:

1. by accessing our site, you have given your consent to the processing of your personal data and to the sending of the Newsletter. In this case, the processing of your data is based on your express consent.
2. You are our customer or our supplier. If you belong to this category, we think that you have the desire to be informed on the latest news concerning us. The processing of your data for the purpose of sending our Newsletter is based on our legitimate interest to promote our activities to all those who have expressed their interest in our work.
3. at fairs or events you have given us your business card, showing interest in our business. If you belong to this category, we think that you have the desire to stay up to date on the latest news concerning us. The processing of your data for sending our Newsletter is based on our legitimate interest to promote our activities to all those who have expressly shown their interest in our work.
4. you are a journalist, or a publicist and you contact us for information or press releases about our business. If you belong to this category, we believe that you have the desire to stay up to date on the latest news concerning us. The processing of your data for sending our Newsletter is based on our legitimate interest to promote our activities to all those who have expressly shown their interest in our work.

In any case, if you no longer wish to receive our communications, you can always revoke your consent or ask to be removed from our Newsletter list, as recognized by art. 21 of the GDPR.



## Login details

In order to subscribe to our Newsletter you only need to provide us your email address, which is the only personal data that we process, unless you wish to provide us with other information (such as your first name, last name, city of residence). This would enable us to personalize our email.

## Data collection and treatment based on consent

It's possible to start receiving our Newsletter by accepting the service, pressing the opt-in button in our website or in our email sent to you.

The Newsletter registrations are recorded in order to verify that the registration process is in accordance with the legal requirements. This includes storing the confirmation time and the IP address.

The changes of your data are also recorded.

We collect your personal information in our server in Treviglio (Italy), and we use them only to send you our emails.

Our staff, using our database, is acting on our specific instructions concerning purposes and arrangements of such processing.

The Privacy Policy relating to the Newsletter service used on the Site, contains all the information you need to know in order to be able to use the service with serenity, and in full awareness of the data you provide or will provide for subscribing to the service itself.

This information is an integral part of our privacy policy which you can find at the following link [https://www.crtsgroup.com/wp-content/uploads/2019/11/PrivacyPolicy\\_CRTechnologySystems\\_SpA-ITA.pdf](https://www.crtsgroup.com/wp-content/uploads/2019/11/PrivacyPolicy_CRTechnologySystems_SpA-ITA.pdf)

The Newsletter allows you to receive periodic updates relating to issues in the energy sector.

The newsletter is sent by e-mail to those who have given explicit consent, or to those who explicitly request it, by filling out the form on the WWW.CRTSGROUP.COM website and authorizing the Technology Systems S.p.A. DATA CONTROLLER to the processing of your personal data.

## COMMUNICATION OF DATA AND TRANSFER ABROAD FOR USE OF THE SERVICE

Your email address and your name will be processed to send you emails relating to our updates through the MailChimp platform (for the management of newsletters), owned by "The Rocket Science Group LLC" (Atlanta, USA), which acts as controller and adheres to the Privacy

Shield agreement which regulates the transfer of personal data between the European Union and the USA.

A transfer of extra EU data covered by adequate guarantees is therefore set up. You can consult the privacy policy of the Mailchimp service at the following link:

<https://mailchimp.com/legal/privacy/>

## HOLDER OF THE TREATMENT

The data controller of the collected data, except as expressed in the previous point about the communication and transfer of the same abroad, is C.R. Technology Systems S.p.A. Via Rossaro 9, Treviglio 24047 (BG) Italy, Tel: +39 0363 34 981. Email address [info@crtsgroup.com](mailto:info@crtsgroup.com)

The data processing connected to the newsletter service takes place at the C.R. Technology Systems S.p.A. Your personal data will not be forwarded or transferred to third parties and will be stored and protected in our databases located at our office.

## TYPES OF DATA PROCESSED AND PURPOSE OF PROCESSING DATA COMMUNICATED BY THE USER

To subscribe to the newsletter that allows you to receive periodic updates on news and services related to C.R. Technology Systems' activity automatically and free of charge via e-mail. C.R. Technology Systems uses the registration forms on the site by entering your name and e-mail address.

The data entered are used for the sole purpose of allowing us to send the newsletter by e-mail and will not be disclosed to third parties. The purpose of treatment is to send newsletters.

## TREATMENT / ACCESS TO DATA

The company providing the Newsletter service (MailChimp service) can have access to data only for technical reasons of necessity and urgency that require intervention in order not to compromise the functionality of the service and the security of the platform. Appropriate security measures are observed to prevent data loss, illicit or incorrect use and unauthorized access. You can consult the privacy policy of the MailChimp service at the following link <https://mailchimp.com/legal/privacy/>



## DURATION OF DATA

The data provided by the user is kept in the database as long as there is an interest in continuing to receive updates on the company's activities. You can at any time request the modification or cancellation of your data based on art. 7 of the GDPR European regulation 2016/679 by sending an e-mail [news@crtsgroup.com](mailto:news@crtsgroup.com)

## CONSEQUENCES OF FAILURE TO REGISTER A DATA

Failure to consent to the communication and transfer of data as detailed above will make it impossible to use the free Newsletter service.

## RIGHTS OF THE INTERESTED PARTIES UNDER ARTICLES 7-21 OF THE GDPR EUROPEAN REGULATION 2016/679

Data subjects have the right to obtain from the Data Controller, in the cases provided, access to personal data and the correction, modification, blocking, cancellation of the same or limitation of the processing that concerns them or to oppose the processing

Requests should be addressed to the Data Controller Technology Systems S.p.A. at the email address [news@crtsgroup.com](mailto:news@crtsgroup.com)

## CANCELLATION FROM THE SERVICE

To stop receiving the newsletter, click on the word "Unsubscribe" at the bottom of the newsletter itself.

In case of problems, send a report or a cancellation request to the Data Controller at the e-mail address specified above.

## RIGHT TO CLAIM

Interested parties who believe that the processing of personal data referred to them through this site occurs in violation of the provisions of the Regulation have the right to lodge a complaint with the Guarantor, as required by art. 77 of the Regulation itself, or to take appropriate judicial offices (art. 79 of the Regulation).