

PRIVACY POLICY

Circular letter on personal data processing performed by the website: www.transcoop.com pursuant to art. 13 of the European General Data Protection (GDPR – 2016/679)

Transcoop Società Cooperativa, as data controller, give to data subjects the following information on personal data processing.

This circular letter is referred to and is valid only for this website (www.transcoop.com) and not for other websites surfed by the user through links available in www.transcoop.com. The data controller isn't responsible of processing done by third part websites. Please take a look to data processing policy when you visit a third part website.

DATA CONTROLLER AND DATA PROTECTION OFFICER

The data controller is **Transcoop Società Cooperativa**, VAT number: IT01174150357 and established in Via Danubio 2, 42124 Reggio Emilia (RE) - Italy. You can contact the data controller by the following mail address: info@transcoop.com

You can also contact our Data Protection Officer (DPO) at the following e-mail address: dpo@transcoop.com

PURPOSES OF PROCESSING, LEGAL BASIS AND RETENTION TIME

We process personal data only with a proper legal basis established by law. In the following list you can find all the information concerning the purposes of processing, the types of personal data processed, the legal basis and the data retention time.

Purposes of processing	Categories of personal data	Legal Basis	Data retention time
To browse on the website and guarantee the proper functionality and cyber security of the website and other users.	Browsing data	Legitimate interest pursued by the controller to promote his own business through his website and to defend it and the other visitors against possible cyber attacks	Data controller will keep the browsing data for the time strictly necessary to reach processing purposes. For what concern cookies retention time more information are available consulting the website's Cookie Policy.
To manage commercial and information requests received through the contact forms or other communication channels available on the website	Identification data Data concerning contact details and postal address	Legitimate interest of Data Controller concerning the management of communications with data subjects to satisfy specific forwarded requests To the perform a contract in which the data subject is party or to manage pre-contractual request forwarded by data subjects	This data will be processed for the time strictly necessary to manage your request. After this process, this data would be deleted or processed for other purpose (ex. to manage the service provision).
User's registration to	Identification	To the perform a	The data controller will

the website	<p>data</p> <p>Data concerning contact details and postal address</p> <p>Other necessary data requested in registration form.</p>	contract in which the data subject is party or to manage pre-contractual request forwarded by data subjects	keep this personal data until account cancellation.
"Careers" area	<p>Identification data</p> <p>Data concerning contact details and postal address</p> <p>Browsing data</p> <p>Personal data included in data subject's CV or in the application form</p>	To the perform a contract in which the data subject is party or to manage pre-contractual request forwarded by data subjects	Your data will be stored for the time strictly necessary to evaluate your application. Retention time won't anyway exceed 24 months since the submission of your requests.

TYPES OF PERSONAL DATA PROCESSED

Surfing data: The computer systems and software procedures responsible for the functioning of this website acquire, during their normal operation, some personal data, the transmission of which is implicit in the use of Internet communication protocols.

This information is not collected to be associated with identified Data Subjects, but by their very nature could allow users to be identified through processing and association with data held by third parties.

This category of data includes:

- IP addresses or domain names of computers utilized by users connecting to the site;
- the URI (Uniform Resource Identifier) addresses of the requested resources;
- the time of request;
- the method used in submitting the request to the server;
- the size of file obtained in response;
- the numeric code indicating the status of response given by the server (good result, error, etc.),
- other parameters relating to the operating system and the user's IT environment.

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

The site could also automatically process data through sending of cookies to the user. Cookies are small strings of text sent during consultation on the website and, based on their purpose and the value assumed, they allow the site and/or third parties to collect information related to the user. The use of this electronic tool is analytically described through the Cookie Policy of the website.

Personal data sent by the user: The user can submit his personal data to data controller by the following tools available on the website:

- a) **Contact form:** through the contact form available on the website the users can submit specific requests to data controller. It's necessary to provide personal identification data and contact details as other information to allow data controller to manage the request. Data collected will be exclusively employed to answer requests submitted and will be processed further only if a business relationship is established between user and Data Controller.
- b) **Registration and login to reserved area:** your personal information submitted through the registration form of personal area is mandatory to create the your account. All data sent and collected through personal area will be employed to answer your specific requests (for ex. to recover access credentials, information concerning data controller's activities, to manage business relations, etc.), as well as to ease business relations with the data subjects. Registration would be eventually required to use E-Commerce functions available on the website.
- c) **"Careers" area:** Inside the website is available a "Careers" area, where the user can submit applications to job opportunities or send his own CV. The personal data sent to data controller will be processed to evaluate the fitness of applicant to the open job positions available in the company.

TRASMISSION OF PERSONAL TO THIRD PARTIES

Your personal data may be transmitted only to the following third parts:

- Companies which provide IT system and website management services (as e-commerce and secure payment infrastructure, web development consultants, etc.);
- Companies and professional offices which provide business assistance and consultancy (IT technologies, accounting, etc.);
- Transport companies associated to Transcoop;
- Public institutions for the fulfillment of legal obligations related to commercial relationship, and so far as crime or cyber-attacks to our systems or to other website visitors be detected, or to manage the litigations.

More information related to the third parts who may process your personal data are available by contacting the data controller.

PROVISION OF DATA AND CONSEQUENCES OF REFUSAL TO REPLY

The communication of your personal data is mandatory when the process is necessary to browse on the website, to carry out commercial and information requests received through the contact forms, to provide the services or to perform a contract with customer. If this personal data wouldn't be transmitted it will be impossible to carry out data subject's requests.

In the other cases the transmission of data it's optional and, when necessary, dependent to data subject's explicit consent.

RIGHTS OF DATA SUBJECTS

You are informed of the existence of your right to request **access** to your personal data, **rectify** and **cancel** the same, **restrict the processing of data** concerning yourself, **object** to their processing, **data portability** (Articles 15 to 22 of the EU Regulations 2016/679 GDPR);

You can exercise your rights and know the third parties to whom data may be communicated by writing to the e-mail address: info@transcoop.com

Or you can contact our Data Protection Officer through this e-mail address:

dpo@transcoop.com

If the data processing has his foundation on your explicit consent (art. 6, § 1, lect. a), you have the right to revoke this consent whenever you want, without prejudice the lawfulness of previous processing activities.

You are entitled to file your complaints with the control authority at the Supervisory Authority address for the protection of personal data, by sending a certified e-mail to the address protocollo@pec.gpdp.it, or with the control authority of another EU member country.

This circular letter was updated on 02/11/2020.