

Data Controller

SINCRONIS S.R.L.

Via Ferri, 6
20092 Cinisello Balsamo (MI) - ITALY

email: privacy@sincronis.com

Data Protection Officer

Here are the contacts of our D.P.O.:

email: dpo@sincronis.com

Types of Data Processed

(1) Navigation data

This category of data includes for example browsing data, such as IP address, name and domain of, URI (Uniform Resource Identifier), time of the request, method used to request submission to the server, response file dimension, numerical code of server response status (success, error, etc.) and any other parameter related to the operating system and the user's device.

Navigation data generally are not kept for more than seven days (except for any need of the judicial authorities for detecting crimes).

(2) Data provided directly by you

In order to use some of the services in this Site, it is requested to indicate some personal data; in order to get the information on such processing, please see the relevant privacy notice provided therein.

(3) Cookies

This Site uses only technical cookies and equivalents.

What are cookies?

Cookies are small text files sent to the user's terminal equipment (usually to the user's browser) by the websites the user visits; they are stored in the user's terminal equipment to be then re-transmitted to the websites on the user's subsequent visits.

First party and third party cookies

First-party cookies are put on your device directly by the website you are visiting, instead third-party cookies are placed on your device by a third party (like an advertiser or an analytic system).

Technical, analytical and profiling cookies

Depending on the purpose, cookies can be divided into technical cookies and profiling cookies.

Technical cookies are stored for the sole purpose of “carrying out the transmission of a communication over an electronic communication network or as strictly necessary for the supplier of an information society service explicitly requested by subscriber or user to provide the service” (see Art. 122, paragraph 1 of Privacy Code).

They are essential for you to browse the websites and use its features, such as accessing secure areas of sites (so-called “essential” or “strictly necessary”). They allow a user to navigate back and forth between pages without losing their previous actions from the same session. Cookies that allow web shops to hold your items in your cart while you are shopping online are an example of strictly necessary cookies. These cookies will generally be first-party session cookies.

This category includes also “references cookies” (also known as “functionality cookies”), which allow a website to remember choices you have made in the past, like what language you prefer, what region you would like weather reports for, or what your username and password are so that you can automatically log in.

“Statistics” or “analytical” cookies (also known as “performance cookies”) collect information about how you use a website, which pages you visited and which links you clicked on in order to improve website functions.

Pursuant to the art. 122, paragraph 1 of the Privacy Code, technical cookies do not require consent, but it should be explained to the user what they do and why they are necessary or useful.

Pursuant the Decision, analytical cookies are equivalent to technical cookies (and, therefore, users’ consent is not required) if:

- are stored directly exclusively by the owner of the visited website with the purpose to collect aggregated information on the number of users and how they visit the website, or
- created and made available by third parties if:
 - used by the first party for merely statistical purposes, where the ability to identify users is reduced (for example, through hiding significant portions of the IP address) and such data are processed just for make aggregate statistics in relation to a single site or a single mobile

application (so there is no tracking of the navigation of the user on different applications or navigating different websites);

- such third parties, who provide the web measurement service, do not combine, enrich or cross-reference the data, even minimized as above, with other information available to them (e.g. customer files or statistics of visits to other sites) or transmit them to other third parties.

“Profiling” or “marketing” cookies are used to track your on line activity and behaviour for marketing purposes. They allow advertisers to create profiles of users’ preferences, habits, choices, etc. in order to deliver them targeted advertising.

These kinds of cookies can be stored on the users’ device only after they have given their consent.

Users must be able to access the websites even if they refuse to allow the use of profiling cookies.

Permanent and session cookies

Session cookies are temporary and expire once you close your browser (or once your session ends).

Persistent cookies remain on your hard drive until you erase them or your browser does, depending on the cookie’s expiration date. All persistent cookies have an expiration date written into their code, but their duration can vary.

What are the cookies used by the Site?

Technical cookies

The Site uses only technical cookies stored by the Site itself in order to ensure and monitor its functionalities and to enable efficient browsing of the Site as well as to allow user to access to the contents and services requested.

This type of cookie cannot be disabled.

- Google Analytics
- Google Tag Manager
- Google Fonts
- Google Maps
- Polylang
- Cookie Law Info Consent

Anonymised analytical cookies

The site uses analytical cookies created and made available by third parties to statistically analyse accesses or visits to the site, to allow the Controller to improve its structure, navigation logic and contents and to collect information on the use of the site.

For further details and information you can visit the following link:
<https://support.google.com/analytics/answer/1011397>

These cookies, suitably anonymised (by masking out significant portions of the IP address), allow the collection of aggregate information on the number of users and how they visit the site without being able to identify the individual user.

Provision of data

Navigation data are necessary in order to carry out computer and telematic protocols.

In addition, there are other data necessary for the provision of some services of the Site; therefore, refusal to provide such data may prevent the use of service.

Categories of recipients

Data are processed by the Controller's employees who have been expressly authorised to process such data for the above-mentioned purposes and have received adequate operating instructions.

Data may be processed, on behalf of the Controller, by third parties, appointed as processors pursuant to art. 28 of the GDPR, carrying out activities that are functional to the services provided (e.g., IT services)

Data may be disclosed to parties operating as controllers, such as supervisory and regulatory authorities and, more generally, public or private entities, legally authorized to access to data, as well as to third party providers (or vendors) listed in the above table containing the list of cookies, which also include a link to the relevant privacy notice.

If the data are transferred outside EU/EEA, in countries not deemed adequate by the European Commission, the Standard Contractual Clauses pursuant to Article 46.2(c) of GDPR (hereinafter, "SCC") shall be used, with the possible provision of "supplementary measures" to ensure a level of protection essentially equivalent to that guaranteed within the European Union.

Rights of the Data Subject (User)

Users can exercise certain rights with reference to the Data processed by the Data Controller.

In particular, the User has the right to:

- **withdraw consent at any time.** The User can revoke the consent to the processing of their Personal Data previously expressed.
- **oppose the processing of their data.** The user can oppose the processing of their data when it occurs on a legal basis other than consent. Further details on the right to object are indicated in the section below.
- **access their data.** The User has the right to obtain information on the Data processed by the Data Controller, on the methods of processing and to receive a copy of the Data processed.
- **verify and request rectification.** The User can verify the correctness of their Data and request its updating or correction.
- **obtain the restriction of the processing.** When certain conditions are met, the User may request the restriction of the processing of their Data. In this case, the Data Controller will not process the Data for any other purpose than their conservation.
- **obtain the erasure or removal of their data.** When certain conditions are met, the User can request the cancellation of their Data by the Data Controller.
- **obtain their data or have them transferred to another Data Controller.** The User has the right to receive their Data in a structured format, commonly used and readable by an automatic device and, where technically feasible, to obtain the transfer without obstacles to another Data Controller. This provision is applicable when the Data is processed with automated tools and the processing is based on the User's consent, on a contract to which the User is a party or on contractual measures connected to it.
- **file a complaint.** The User can file a complaint to the competent personal data protection supervisory authority (Garante Privacy - https://www.garanteprivacy.it/home_en) or take legal action.

Details on the right to object

When Personal Data are processed according to the public interest, in the exercise of public authority vested in the Data Controller or to pursue a legitimate interest of the same, Users have the right to object to the processing for reasons related to their particular situation.

Users are reminded that, if their Data is processed for direct marketing purposes, they can oppose the processing without providing any reasons. To find out if the Data Controller processes data for direct marketing purposes, Users can refer to the respective sections of this document.

How to exercise Your Rights

To exercise the User's rights, Users can direct a request to the contact details of the Data Controller indicated in this document. Requests are filed free of charge and processed by the Data Controller as soon as possible, within one month.