Total ERP S.r.l.
Via I Maggio 4
25055 Pisogne (BS)
PI e CF: 04335950988

PRIVACY AND COOKIE POLICY

INFORMATION ON THE PROCESSING OF PERSONAL DATA PURSUANT TO ARTICLES 13 AND 14 OF EU REGULATION 679/2016

We hereby inform you that, pursuant to Articles 13 and 14 of EU Regulation 679/2016 (hereinafter referred to as the 'GDPR'), your data provided to us through the use of the website ***www.totalerp.it*** (hereinafter, also referred to as the "Website") will be processed as follows, in compliance with the principles of correctness, lawfulness, transparency and protection of your privacy and your rights. This information provides the user (data subject) with any additional information necessary to ensure correct and transparent processing, in relation to the specific context in which personal data are collected and subsequently processed.

This information is provided only for the Site and the subdomains related to it and not for third-party websites accessible through any hyperlinks contained in the Site, for which the Data Controller is in no way responsible. For such processing, independent information must be provided by the respective data controllers.

Data Controller	The Data Controller is **TOTAL ERP S.r.l.** Via I Maggio 4, 25055 Pisogne (BS), PI e CF: 04335950988 Telefono: 0364 191 6054 - Email: info@totalerp.it

Purpose of the processing	**Legal basis of the processing and mandatory nature of the provision of data**	**Retention period**
1. Monitor the technical operation and performance of the site.	Legitimate interest of the data controller (art.6, paragraph 1, letter f) of the GDPR).	Until the end of the session/browser closure or according to the provisions of the Cookie Policy
2. Acquire browsing data (cookies) that can be disabled from the browser settings (number of visitors per time slot or day, most visited pages, etc.).	Consent of the user given by clicking on the "accept" button of the banner that appears when accessing the site. In this regard, you can review your choices by clicking on "update your preferences" at the bottom ("footer") of the site (art.122 of Legislative Decree 101/2018 "Privacy Code" - Guidelines for cookies and other tracking tools - 10 June 2021 of the GPDP)	
3. Respond to requests received through the contacts on the site	Performance of a contract to which the data subject is a party or the execution of pre-contractual measures taken at the request of the data subject (Article 6, paragraph 1, letter b) of the GDPR). The provision of data is mandatory with reference to this purpose, if it is denied this will make it impossible to respond to your communications.	Up to the time necessary to respond to requests received on the user's initiative.
4. Newsletter subscription	Consent of the data subject.	2 years since the last interaction.

Data categories	The data processed can be: a) *Browsing data* Browsing data, collected automatically, exclusively for the purpose of obtaining aggregate and anonymised statistical information relating to the use of the Website (including, by way of example, IP addresses, browsing times, geographical data and other parameters relating to the user's operating system and IT environment); however, this information could, also through processing and/or association with other data, held by the provider or by third parties, allow the identity of the user to be traced, as well as be used to ascertain any liability in the event of hypothetical computer crimes against the site or, in any case, related to navigation on any links. *b) Cookies* This site uses cookies or markers, which are technically packets of information sent by a web server (in this case, by this site) to the user's browser and stored by the latter on their device (personal computer, tablet, mobile phone, etc.) and automatically sent back to the server at each subsequent access to the site. Consult the specific cookie policy for further information.

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Processing methods	d) *Data provided voluntarily by users/visitors* If you decide to send messages to the contact details on the site, the Data Controller will process such data only to respond to your requests. The processing will be carried out using IT tools, also by means of authorised subjects, who operate under the direct authority and according to the instructions given by the Data Controller, with logics strictly related to the purposes indicated and, in any case, in such a way as to guarantee the security and confidentiality of the data processed. The processing operations are carried out in such a way as to guarantee the security of data and systems. Specific security measures are adopted in order to minimize the risks of destruction or loss, even accidental, of the data themselves, unauthorized access, unauthorized processing or processing that does not comply with the purposes indicated in this policy. In particular, the Site uses the HTTPS protocol for server authentication and encryption of the communication channel. The security measures adopted, however, do not allow the risks of interception or compromise of personal data transmitted by electronic means to be absolutely excluded. It is therefore recommended to check that the device in use by the user is equipped with adequate software systems for the protection of electronic data transmission, both incoming and outgoing (such as, for example, updated antivirus systems, firewalls and spam filters).
Recipients 	In addition to the Data Controller, other parties involved in the organization (appointed personnel) or external parties (web agency, hosting provider, other third-party technical service providers) may have access to the Data, also appointed, if necessary, as Data Processors or Joint Controllers by the Data Controller. The updated list of Data Processors can always be requested from the Data Controller. This is without prejudice to any communication of data at the request of the judicial or public security authority, in the manner and cases provided for by law.
Diffusion 	Under no circumstances will personal data be communicated, disseminated, transferred or otherwise transferred to third parties for unlawful purposes and, in any case, without providing adequate information to the Data Subjects and obtaining their consent, where required by law.
Data transfer abroad 	The transfer of your data to countries outside the European Economic Area (EEA) takes place by third-party cloud service providers that Total ERP S.r.l. uses for the management of its activities. In this case, personal data will not be transferred to countries or international organizations that do not belong to the European Union that do not guarantee an adequate level of protection, recognized, pursuant to art. 45 GDPR, on the basis of an adequacy decision of the EU Commission. In the event that it is necessary for the provision of the services of the Site, the transfer of personal data to non-EU countries or international organizations, for which the Commission has not adopted any adequacy decision pursuant to art. 45 GDPR, will only take place in the presence of adequate guarantees provided by the recipient country or organization, pursuant to art. 46 GDPR and provided that data subjects have enforceable rights and effective remedies. In the absence of an adequacy decision by the Commission, pursuant to art. 45 GDPR, or adequate guarantees, pursuant to art. 46 GDPR, including the binding corporate rules, the cross-border transfer will only take place if one of the conditions indicated in art. 49 GDPR.
Rights 	The GDPR grants the data subject various rights, which can be exercised by contacting the Data Controller at the addresses indicated in this policy, provided that the conditions provided for by the legislation from time to time are met: **access their Data:** they have the right to obtain information on the Data processed by the Data Controller, on certain aspects of the processing and to receive a copy of the Data processed. **verify and request rectification:** you can verify the correctness of your Data and request that it be updated or corrected. **obtain the deletion or removal of your Personal Data:** when certain conditions are met, you may request the deletion of your Data by the Data Controller. **withdraw consent at any time**: you can revoke the consent to the processing of your Personal Data previously expressed. **object to the processing of your Data**: you can object to the processing of your Data when it takes place on a legal basis other than consent. **obtain the restriction of processing:** when certain conditions are met, you may request the restriction of the processing of your Data. **obtain data portability:** you have the right to receive your Data in a structured, commonly used and machine-readable format and, where technically feasible, to obtain its unhindered transfer to another controller. This

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	provision is applicable when the Data are processed by automated means and the processing is based on consent, on a contract to which you are a party or on contractual measures connected to it. **lodge a complaint:** you can lodge a complaint with the competent data protection supervisory authority or take legal action. **How to exercise your rights** To exercise your rights, you can send 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, in any case within one month. The Data Subject may avail himself/herself, for the exercise of his/her rights, of non-profit bodies, organizations or associations, whose statutory objectives are of public interest and which are active in the field of the protection of the rights and freedoms of the Data Subjects with regard to the protection of personal data, conferring, for this purpose, an appropriate mandate. The Data Subject may also be assisted by a trusted person. To find out about their rights, submit a complaint/report/appeal and be kept up to date on the legislation on the protection of individuals with regard to the processing of personal data, the Data Subject may contact the Data Protection Authority, by consulting the website at http://www.garanteprivacy.it/.

COOKIE POLICY



Cookies

What are Cookies

Cookies consist of portions of code installed within the browser that the sites visited by users send to their terminals where they are stored to be retransmitted to the same sites on subsequent visits.

These technologies are used to perform computer authentication, session monitoring and storage of information regarding the activities of users who access a service and may also contain a unique identification code that allows you to track your browsing within the site for statistical or advertising purposes.

There are in fact different types of cookies that, depending on their characteristics and functions, may persist on your device for different periods of time: the so-called session cookies, which are automatically deleted when you close the browser; and so-called persistent cookies, which remain on your device for up to a set time.

In line with the Applicable Legislation, your prior consent for the use of cookies is not always required. In particular, such consent is not required for "technical cookies", e.g. those used for the sole purpose of transporting a communication through an electronic communication network, or strictly necessary to provide a service expressly requested by the user. In other words, cookies that are essential for the operation of a site.

Your prior consent is instead required for non-anonymized "analytical" cookies and for profiling cookies, e.g. those that provide statistical analysis on the use of a website or that create user profiles to send them advertising messages in line with the preferences they have expressed while browsing.

What Cookies does this site use?

First-party cookies:

- technical, for purposes related to the proper functioning of the site, for the provision of the service and to allow or improve navigation on the site or store searches, statistical cookies used directly by the site manager to collect information in aggregate and anonymous form. This category of cookies does not require the collection of the consent of the data subject and are automatically installed when the Site is accessed;
- statistical, which are used to understand how visitors interact with the site, collecting and transmitting information;
- analytical, to analyze page traffic anonymously, without storing personal data, to collect statistical information on the use of the service by users such as the number of visitors and pages visited

How to Change and Disable Cookies

Cookies can be completely deactivated by the browser using the appropriate function provided in most browsers. However, it is good to know that if you disable cookies, some of the functions of the Site may not be usable.

You can disable them at any time by manually changing the configuration of your browser and following the instructions contained in the policies of the cookie managers of the individual browsers.