

## PRIVACY POLICY

Information on the processing of personal data pursuant to art. 13 of the Privacy Code and in compliance with the Recommendation n. 2/2001 that the European Authorities for the Protection of Personal Data, gathered in the Group established by art. 29 of the Directive n. 95/46 / EC, they adopted on 17 May 2001 to identify some minimum requirements for the collection of personal data online.

### 1. Nature of the data processed - Data controller

Personal data will be processed by Leader-cam s.r.l., based in Maniago (PN), Via Dei Fabbri No. 11, P.I. 00181080938, telephone 0427/72549 - fax 0427/71142 - email [leadercam@leadercam.com](mailto:leadercam@leadercam.com), , acting as the data controller in relation to the personal data provided by the user when registering at [www.leadercam.com](http://www.leadercam.com)(Website) , or on the occasion of the purchase of products on the Site. This notice is also intended for any person who interacts with the pages of the Site without making any registration.

### 2. Purpose of the treatment

Leader-cam s.r.l. will process personal data provided by the user for the following purposes::

- to allow registration on the Site and use services reserved for registered users;
- in the event that the user makes use of the e-commerce service provided by Leadercam on the Website:
  - to allow the correct execution by Leadercam of the operations connected with the online purchase and, therefore, to allow it to correctly and punctually fulfill the obligations arising from the contractual relationship established with the user, as well as for administrative obligations and of the law connected to it;
  - limited to the e-mail coordinates provided by the user in the context of the purchase of a product from the Site, to allow direct sale of similar products (so-called soft spamming), creation of a database by mailing list, provided that the user does not oppose this treatment;
- to reply by email to user requests;
- for administrative-accounting purposes connected to the registration on the Site and the making of an online purchase as well as to fulfill legal obligations;
- with the express consent of the user, for the transmission, by Leadercam of informative and promotional communications - including the newsletter - in relation to products and services of their own or third parties, as well as for carrying out market research also aimed at evaluating the degree of customer satisfaction (customersatisfaction), by email and / or postal service (so-called "marketing purposes"), with your consent, for the processing of your business profile, through detection and processing of your choices and habits of purchase on the Site, in order to monitor the degree of customer satisfaction to ensure a better satisfaction of the needs of the same, and to send advertising material, related to products and / or services of the Company and / or third parties, of your specific interest, by means of automated systems, such as e-mail, text message or MMS, or through traditional methods (eg: paper mail or telephone) (profiling purposes) is.
- for statistical purposes.

### 3. Method of treatment.

The processing of personal data concerning the user will mainly be carried out with the aid of electronic or automated means, according to the methods and with the appropriate tools to ensure the security and confidentiality of the data, in compliance with the provisions of the Code of Privacy. In particular, all technical, informatics, organizational, logistic and procedural security measures will be taken, so that the minimum level of data protection provided by law is guaranteed, allowing access to only those in charge of processing by the owner. of the treatment or of the responsible eventually designated by the holder. In fact, a Virtual Private Server will be used, whose provider has ensured that the service will allow the storage of online data accessible exclusively by Leadercam. The supplier is not / will be able to recover data / credentials to access the operating system and can / can access the physical machine (in case of malfunction) only with the permission of Leadercam and, in any case, in rescue mode (credential generation temporary access to login). The information acquired and the methods of processing will be relevant and not excessive compared to the type of services rendered. The data will also be managed and protected in environments whose access is under constant control.

### 4. Credit card details

To make a payment on the Site by credit card, the user must enter the confidential data of the credit card (card number, holder, expiry date, security codes). These data will be acquired by the payment service provider who will act as autonomous data controller, without transiting from the Leadercam server, which therefore will not process such data in any way. The user who has registered on the Site may request, via the Site, the saving of such data but the data will be saved directly from the payment service provider and will not be acquired by Leadercam itself.

### 5. Sensitive data

/ The sensitive or judicial data of the user are not the object of the processing by Leadercam.

### 6. IP addresses and log files

Leader-cam s.r.l. will keep, within the terms established by law, the log files and IP addresses used when making an online purchase, in order to prevent and verify possible fraud in online transactions.

### 7. Internet browsing

It is possible to access the site without being required to provide any personal data. However, the computer systems and software used to operate the Site 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 also due to their very nature could, through processing or association, allow the identification of the user. This category includes the IP addresses or domain names of the computers used by the user who connects to the Site, the URL addresses in the URL of the requested resources, the time of the request, the method used in submitting the request to the server, the size of the file obtained in response, etc. These data are used only to obtain anonymous statistical information on the use of the Site (such as, in particular, the number of

accesses) and to check its correct functioning and are deleted immediately after processing. In this process the processing of directly identifying information is not foreseen.

#### 8. Provision of data and consequences in case of non-consent to treatment

The provision of data for the purposes referred to in paragraph 2 is purely optional. However, as this processing is necessary to allow registration to the Site and the performance of the online purchase service, any refusal by the user to provide the data in question will make it impossible to register on the Site and to conclude an online purchase.

#### 9. Scope of data communication

Personal data submitted by the user, for the purposes described in art. 2 above, may be brought to the attention of or communicated to the following subjects:

- Employees and / or collaborators of Leadercam for carrying out administrative, accounting and IT and logistic support activities acting respectively as managers and processors;
- to the company sending, on behalf of Leadercam, promotional communications and newsletters transmitted on behalf of Leadercam;
- to the subjects who manage online payment transactions;
- to all those public and / or private entities, natural and / or legal persons (legal, administrative and fiscal consultancy), if the communication proves necessary or functional to the correct fulfillment of the contractual obligations assumed in relation to the services provided through the Site, as well as the obligations deriving from the law;
- to shippers and to the subjects in charge of the delivery and / or collection of the purchased products;
- to all those subjects (including Public Authorities) who have access to data under regulatory or administrative provisions.

All personal data submitted by the user in connection with the registration to the Website and / or the purchase through the Website are not subject to disclosure. The updated list of data processors and persons in charge of processing is available at the registered office of the data controller.

#### 10. Data retention

User data will be kept only for the time necessary to guarantee the correct performance of the services offered. In the case of closure of the Site's account at the user's initiative, the data reported in it will be kept for administrative purposes for a period not exceeding 5 years, without prejudice to any specific legal obligations on the conservation of accounting documentation or for purposes of public security. In order to close your personal account on the Website, the user can contact Leader-cam s.r.l. at the addresses indicated in the art. 1. In any case, it is understood that personal data will be stored and processed for the purposes referred to in art. 2 above, for the period of time allowed by the law and the provisions of the Guarantor for the Protection of Personal Data. Before this period Leadercam may ask the user to renew consent to the processing of their data for such purposes or to make them anonymous and keep them only for statistical purposes.

#### 11. Right of the interested party

Pursuant to art. 7 of the Privacy Code and of the European Regulation No. 679/2016, the interested party has the right to:

1. obtain confirmation of the existence or not of personal data concerning him and their communication in an intelligible form;
2. get indications:
  - on the origin of personal data, on the purposes and methods of processing, on the logic applied in case of treatment carried out with the aid of electronic tools;
  - on the identification data of the data controller;
  - on the subjects or the categories of subjects to whom the data may be communicated or who may become aware of them as representative appointed in the territory of the state, managers or agents;
3. obtain:
  - updating, rectification or integration of data concerning him;
  - The cancellation, transformation into anonymous form or blocking of data processed in violation of the law, including those whose retention is necessary in relation to the purposes for which the data were collected or subsequently processed;
  - the attestation of the fact that the operations referred to in the preceding points have been brought to the attention also with regard to their content, of those to whom the data have been communicated or disseminated, except in the case in which this fulfillment proves impossible or involves the use of means that are manifestly disproportionate to the protected right;
4. for legitimate reasons, to the processing of data concerning him, even if pertinent to the purpose of the collection;
  - for legitimate reasons, to the processing of data concerning him, even if pertinent to the purpose of the collection;
  - to the processing of personal data concerning him, provided for the purposes of commercial information or the sending of advertising or direct sales material or for carrying out market research or commercial communication.

object, in whole or in part:

- obtain from the data controller the limitation of processing when one of the hypotheses provided for by art. 18 of the European Regulation No. 679/2016

object, in whole or in part:

- to receive, in a structured, commonly used and automatically readable form, personal data concerning him / her provided to a data controller and has the right to transmit such data to another data controller without impediment by the data controller which he provided them in the cases provided for by art. 20 of the European Regulation No. 679/2016

object, in whole or in part:

- propose a complaint to the national supervisory authority; to the processing of personal data for the purpose of commercial information or the sending of advertising or direct sales.