

## PRIVACY POLICY

Consorzio ERP Italia (hereafter "ERP"), with its registered office in Via Roma no. 74 -20051 Cassina dè Pecchi (MI) - Tax code/VAT no. 05495760968, in its capacity as data controller under Art. 13 of EU Reg. 2016/679 (GDPR) provides its information on personal data processing type and extent carried out by this website (hereafter "Site") for those who interact with Site services through consultation or use of its services. Users should consult this policy and other information posted on the Site before disclosing data to ERP. This policy does not cover other websites that the user may consult through links. The services provided by this Site are for those older than 18 years. ERP will delete any data which it confirms has been sent by a minor. Contact details: tel. 02/92147479, fax 02/92592334 email [segreteriaerp@erp-recycling.org](mailto:segreteriaerp@erp-recycling.org)

**1. Data provided voluntarily by users.** The user can send third-party personal data while using some Site services. In these cases, the user acts as an independent data controller, assuming all legal obligations and liabilities, including: 1) ensuring the processing is grounded on one of the legal bases provided for in GDPR Article 6; 2) indemnify ERP in any dispute or claim for damages from data processing by third parties whose data has been processed by the user using the Site functions in violation of data protection regulations. Personal data (name, address, email, contact details, etc.) shared voluntarily, e.g. in a request sent by email to the addresses indicated on the Site, is processed to respond to user requests. The legal basis of the processing is Article 6 paragraph 1 letter b) of the GDPR as the processing is necessary to provide services or respond to user requests (performance of pre-contractual or contractual services). The user is obliged to communicate only the necessary data. The provision of data for these purposes is optional, but failure to do so would make it impossible to activate the Site's services. If the user data falls under one of the "special data categories" (GDPR art. 9: data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning health, sex life, or sexual orientation), users are requested to provide such data only if strictly necessary. Please note that if special data is communicated but there is no user's explicit consent (an eventuality which, however, obviously allows users to send a résumé), ERP cannot be held liable nor receive any complaints as the processing concerns data made public by the data subject (GDPR art. 9 paragraph 2) letter e)). In any case, it is emphasized the importance of users expressing their explicit consent to the processing of particular categories of data if they decide to communicate them to ERP. The data is kept for a year after the last message.

### **2. Data collected in the RESERVED AREA.**

**Purpose:** to allow the creation of a user account, access to the user personal area of the Site and send communications relating to WEEE equipment sold or placed on the national market (Legislative Decree 188/2008 and Legislative Decree 49/2014). **Data processing legal basis:** contractual and legal obligations. **Data recipients:** WEEE Coordination Centre (cdcraee.it), National Coordination Centre for Batteries and Accumulators (cdcnpa.it), and the Ministry of Environment, Land and Sea protection. Please refer to the sections "Data recipients" and "Data transfer to non-EU States" of this Privacy Policy. **Data retention:** data is stored for ten years. **Rights:** users may exercise the rights indicated in the "User rights" section of this Privacy Policy. **Data provision and refusal:** the provision of data for these purposes is optional but is a necessary requirement to create user accounts and send the above communications. Refusal to provide such data makes it impossible to perform the above activities. Only those older than 18 years can send their data. ERP will delete any data which it confirms has been sent by a minor.

**3. Use of cookies.** Cookies are text files that websites send to users' Internet access devices (usually browsers) where they are stored and retransmitted to the same sites at the next user visit. There can be: 1) technical cookies: session cookies (they ensure the navigation and the usability of the sites), functional cookies (they allow users to select specific parameters when browsing, e.g. the choice of a product to buy or the language used), user authentication cookies (login); 2) profiling cookies: used to send promotional messages in relation to the preferences expressed by users in navigation or the sections visited; 3) third-party cookies: cookies not installed by the sites that users visit but by third-party sites that install cookies through the initial site. Cookies may disappear when the browser is closed (session cookies) or remain on users' devices until they expire (permanent cookies). User consent is not required for technical cookies as these are used to send a communication over an electronic network or provide a user-requested service. Analytical cookies, when used directly by a website operator to collect information, in aggregate format, on the number of users and how they visit the website, do not require user consent.

Users can always choose which cookies to authorise through browser configurations:

<https://support.microsoft.com/it-it/help/17442/windows-internet-explorer-delete-manage-cookies>

<https://support.mozilla.org/it/kb/Attivare%2520e%2520disattivare%2520i%2520cookie>

<https://support.google.com/chrome/answer/95647?hl=it&topic=14666&ctx=topic>

<https://help.opera.com/en/latest/web-preferences/#cookies>

<https://support.apple.com/it-it/guide/safari/sfri11471/mac>

<https://support.apple.com/it-it/HT201265>

Various advertising platforms also offer the possibility of rejecting or accepting the cookies used by the companies that use the platforms, through mechanisms that do not prevent the display of advertising but prevent the installation of cookies in order to adapt the advertising of the platforms to the centers of interest of the users. For example, it is possible to use [www.youronlinechoices.com](http://www.youronlinechoices.com) to prohibit these cookies' installation on a device. In this way, users can identify the companies registered with the platform that allow them to refuse or accept cookies which adapt their advertising to their browser data: <https://www.youronlinechoices.com/uk/your-ad-choices> This European platform is shared by hundreds of Internet advertising professionals.

If users disable technical cookies, they risk not being able to use certain parts of a website.

Types of cookies: this Site only uses its technical session cookies.

**4. Data recipients.** Users' data may be shared with: 1) parties with whom it is necessary to interact to provide the services and who may act as data processors, e.g. hosting providers, and the party managing the Site's technology and security of data collected; 2) subjects, bodies or authorities, independent data controllers to whom communicating users' data is mandatory under legal provisions or authorities' orders; 3) persons authorised by ERP to process the data necessary to provide services through the Site (e.g. ERP employees or partners); 4) ERP Italia Servizi srl for the existing contractual relationship with ERP.

**5. Data transfer to non-EU States.** Data is not transferred outside the European Union, or to an international organisation (an organisation and subordinate bodies governed by public international law, or any other body established by or based on an agreement between two or more States).

**6. Data retention.** ERP processes data for the time necessary to provide the services requested and fulfil contractual and legal obligations. The various retention periods are detailed in the specific information. Further information may be requested by writing to ERP.

**7. User rights.** Under GDPR Articles 15 et seq., users have the right to request access to their data, data modification or deletion, processing limitation in the cases provided for by GDPR Art. 18, obtain data in a structured, commonly used and electronically readable format, in the cases provided for by GDPR Art. 20, lodge a complaint with the relevant supervisory authority under GDPR Article 77 (Data Protection Authority) if they consider that the processing of their data is unlawful, make a reasoned request to object to the processing of their data under GDPR Article 21 or withdraw their consent. ERP reserves the right to evaluate requests that would not be accepted if there is a compelling legitimate reason to proceed with the processing that prevails over the interests, rights and freedoms of users.

**8. Modifications.** ERP reserves the right to change the content of this Privacy Policy also due to changes in the law and invites users to review it periodically to be always updated on the data collected and on the use made of it by ERP. This Privacy Policy was updated on 2 March 2021.