

# PRIVACY & COOKIE POLICY

(in accordance with art.13 of EU Regulation 2016/679 and the Provision no.229 of 08/05/2014 of the Italian Data Protection Authority)

MARPOL F.R. S.r.l. considers the protection of personal data of the Users of the website [www.marpolfr.com](http://www.marpolfr.com) (hereinafter "Website") to be of fundamental importance; therefore, through this Policy, drafted and delivered pursuant to art. 13 of EU Reg. 2016/679 (General Data Protection Regulation or GDPR), MARPOL F.R. S.r.l. has decided to share its policy regarding the processing of personal data.

## 1. Data Controller

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The Data Controller is MARPOL F.R. S.r.l., in the person of its legal representative *pro tempore*, with registered office in Sasso Marconi (BO) - 40037, Via San Lorenzo no. 7, VAT no. 02109531208.

## 2. Type of data processed by MARPOL F.R. S.r.l.

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### Navigation data

The computer systems and software procedures used to operate the Website acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols (Internet domain and IP protocol, browser type and operating system of the computer used, date, time and stay on the site, pages viewed, any search engine from which you entered the site). This information is not collected in order to be associated to identified data subjects, but due to its same nature could, by means of processing and integration with data held by third parties, allow users to be identified.

This category includes the IP addresses or domain names of the computers used by the Users to connect to the Website, URI (Uniform Resource Identifier) type of addresses of the resources requested, the time of the request, the method used to submit the request to the server, the size of the response file, the numerical code indicating the status of response from the server (successful, error, etc.) and other parameters concerning the users operating system and computer environment. These data are used only to obtain anonymous statistical information on the use of the Website and will be deleted immediately after processing, except for the need to ascertain crimes by the Judicial Authority.

### 3. Processing of Users' Data

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The Data Controller guarantees that Users' data will be processed in full compliance with current legislation on the protection of personal data.

In particular, the personal data acquired by MARPOL F.R. S.r.l. will be processed by personnel expressly authorised and appointed by the Data Controller, in compliance with the principles of fairness, lawfulness, transparency and protection of the confidentiality and rights of the data subject. MARPOL F.R. S.r.l. will process the data of the data subject for the period of time strictly necessary to pursue the purposes of the processing, in full compliance with the retention obligations established by law.

Personal data will be processed with the aid of computer/telematic or paper instruments, ensuring the use of adequate technical and organisational security measures, pursuant to and for the purposes of art. 32 of EU Reg. 2016/679, suitable to reduce the risk of destruction, loss, unauthorised access or processing of personal data that is not allowed or otherwise not in accordance with the purposes of their collection.

### 4. Purposes pursued through the website

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#### Purposes of the data processing **Enquiry and/or quotes**

Personal data	Data necessary for the identification of the User and the consequent processing of requests (name and surname, physical address, telephone number and email)
Legal basis	Execution of pre-contractual measures (art. 6, par. 1, lett. b) of EU Reg.2016/679)
Consequences of omitted or incomplete provision of data	Inability to follow up on requests made by the User
Duration of data processing	Proportionate to the pursuit of the purposes underlying the processing

#### Purposes of the data processing **Creation of the User Account and access to download the contents of the Website**

Personal data	Data necessary for the purposes of the Request of the Personal Code and the consequent creation of the User account (name, surname, email, company, city, state)
Legal basis	Consent of the data subject (art. 6, par. 1, lett. a) of EU Reg.2016/679)
Consequences of omitted or incomplete provision of data	Inability to complete the Personal Code Request procedure and the consequent creation of the User Account to access the download of the contents of the Website
Duration of data processing	Until revocation of consent communicated to the Data Controller or manifested through the closure of the Account by the User

## Sending promotional communications/newsletters from Marpol F.R. S.r.l. (Direct marketing)

<b>Purposes of the data processing</b>	Sending the User communications with commercial/promotional content through the traditional contact channels (email/SMS/instant messaging) with reference to the activities and services offered by Marpol F.R. S.r.l.
Personal data	Data necessary for sending commercial communications
Legal basis	Consent of the data subject (art. 6, par. 1, lett. a) of EU Reg.2016/679)
Consequences of omitted or incomplete provision of data	Inability to send the User updates on new products and services provided by Marpol F.R. S.r.l.
Duration of data processing	Until revocation of consent by the User and/or proportionate to the pursuit of the purposes underlying data processing

### 5. Scope of data communication

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The personal data provided by the data subjects may be communicated to public, institutional or professional bodies authorised by law to request the acquisition thereof as well as, exclusively for the purposes envisaged in art. 3), to third-party companies or professionals, on which MARPOL F.R. S.r.l. Relies in carrying out its business activities such as, purely by way of example and not of limitation, accounting and tax consultants, legal and industry consultants, third-party companies supplying and servicing IT systems. It should be noted that these "third parties" - unless they act as Data Controllers - have the role of Data Processors, in accordance with the provisions of art. 28 of EU Reg. 2016/679, and consequently comply with the security standards with regard to the processing of data communicated to them, by virtue of a specific contractual agreement. The list of third parties is available upon express request sent to MARPOL F.R. S.r.l. at the addresses indicated at the bottom of this privacy policy. It should be noted that, in any case, the personal data of the data subjects are not disseminated or transmitted to third countries (non-EU).

### 6. Cookies

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Cookies are short text strings (usually in .txt or .xml format) sent by a web server to the User's browser, stored by the latter on the browsing device and automatically re-sent to the server during the same visit to the website (session cookies) or at the next access (persistent cookies). Cookies store information about visitors' preferences in order to improve the functionality of the website and simplify navigation, automating procedures (e.g. login, website language).

Based on the characteristics of the cookies, they can be:

**Persistent cookies:** these cookies remain stored, until their respective expiry dates, on the user/visitor's device. They are used to facilitate navigation within the Website and proper use of the latter, to facilitate access to services that require login (avoiding that users must re-enter their login credentials each time they access the services), for statistical purposes, to know which areas of the website have been visited, and, in some cases, for optimal management of advertising spaces and pages or to provide content and advertising in line with the choices made by visitors.

**Session cookies:** these cookies remain active for the reference session only, i.e. until the browser is closed. They are used to transmit session identifiers necessary to allow the safe and efficient exploration of the website.

**First-party cookies:** these can be either persistent or session cookies; they are managed directly by the owner and/or manager of the website and are used, for example, to ensure website technical operation or to keep track of preferences expressed in relation to the use of the website.

**Third-party cookies:** these can be either persistent or session cookies; they are generated and managed by managers who are not part of the Website visited by the user and are used, for example, to find out the number of pages visited on the same website (so-called "statistical cookies" or "analytics cookies") or to publish content or advertising on the website you are visiting. Third-party cookies include those related to external domains such as social media plugins from Facebook, Twitter, Google+ and LinkedIn. The presence of these plugins involves the transmission of cookies to and from the websites managed by third parties. The management of information acquired by third parties is governed by the relevant privacy policies.

According to their main purposes, cookies may be:

**Technical cookies:** they are used for the sole purpose of "carrying out the transmission of a communication on an electronic communication network, or to the extent strictly necessary for the provider of an IT service explicitly requested by the subscriber or user to provide such service". The aforementioned cookies do not collect any of the User's personal information, they are necessary for the correct functioning of the Website and functional to guarantee normal browsing and use. These cookies are not used for any further purposes and are normally installed directly by the owner or operator of the website. Technical cookies can be divided into navigation or session cookies, which ensure the normal browsing and use of the website (for example, allowing login to access restricted areas); analytics cookies, assimilated to technical cookies when used directly by the website manager to collect information, in aggregate form, on the number of users and how they visit the website; functionality cookies, which allow the user to navigate according to a series of selected criteria (for example, language) in order to improve the service provided to the same. Users' prior consent is not required for the installation of such cookies.



Please note that before we can provide or change any information, we may need to verify the identity of the data subject.

#### INFORMATION ON PRIVACY POLICY

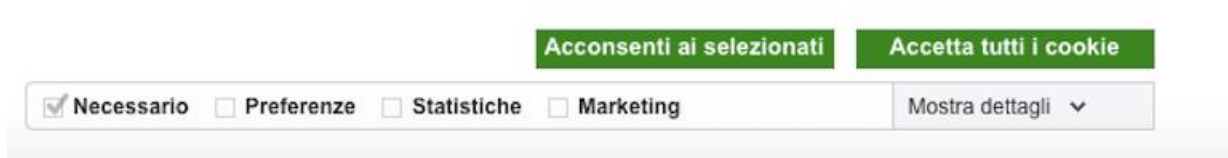
This Privacy Policy was updated on 15/07/2021. The Data Controller reserves the right to amend or update this document; therefore, the Data Controller invites Users to periodically consult this web page. It is expressly specified that MARPOL F.R. S.r.l. is in no way liable for the contents and services provided by websites managed by third parties and accessible through links on the Website.

#### COOKIE BANNER TEMPLATE

Cookie banner with the possibility to accept or not the cookies for which consent is required ( third-party analytical cookies with non-anonymised IP, first- and third-party profiling cookies).

##### Questo sito web utilizza i cookie

Questo sito utilizza i cookie tecnici ed analitici di terze parti per offrirti un'esperienza di navigazione migliore e più ricca e cookie di profilazione per inviarti messaggi pubblicitari in linea con le preferenze manifestate nell'ambito della navigazione in rete. Per maggiori informazioni consulta la cookie policy.



#### TO BE ADDED TO EACH FORM WITH FLAG BOX

##### NEWSLETTER FORM:

- "I declare that I have read the [privacy & cookie policy](#) and I consent to the processing of my personal data for the purpose of subscribing to the newsletter of Marpol F.R. S.r.l. " (if not checked, it must preclude subscription to the newsletter)

##### CONTACTS:

"I declare that I have read the [privacy & cookie policy](#)"

- "I give my consent to the processing of my personal data for the purpose of receiving commercial communications sent by Marpol F.R. S.r.l. (Direct Marketing)" (free flag)

##### ACCOUNT CREATION

- "I declare that I have read the [privacy & cookie policy](#) and I consent to the processing of my personal data" (if not checked it must preclude the creation of the account)
- "I give my consent to the processing of my personal data for the purpose of receiving commercial communications sent by Marpol F.R. S.r.l. (Direct Marketing)" (free flag)