

## Privacy Policy

This page describes both the website's practices on the processing of personal data of users visiting the website and personal data processing methods and purposes. This Privacy Policy has been created in accordance with articles 13-14 of the EU Regulation 2016/679 for those who interact with the web services accessible via electronic data transmission through: [www.todo.to.it](http://www.todo.to.it)

This website is property of TODO SRL, TODO SRL, based in Torino, Corso Galileo Ferraris 14, CAP 10121, who manages and maintains this website with the purpose of providing information and communication relevant to the offered products or services. This privacy policy has been created only for the present website and not for other websites which may be browsed through our links, of which TODO SRL is in no way responsible for. TODO SRL – in capacity as Data Controller of your personal data processing, in accordance with and for the effects of EU Regulation 2016/679 – GDPR, with this page informs you that the said regulation provides for the protection of the interested parties as to the processing of personal data and that such processing will be based on principles of fairness, lawfulness, transparency and protection of your privacy and rights. Your personal data will be processed in accordance with the applicable law of the above mentioned regulation and the obligations of protection herein provided for.

## Types of processed data

**Browsing data** In the normal course of their processing, the proposed IT systems and software procedures used to ensure the correct functioning of this website acquire personal data whose transmission is implicit in the use of the Internet communication protocols. This information is not collected to be associated with identified interested parties, but due to its very nature could, by processing and associations with data held by third parties, allow users to be identified. This category of data comprises IP addresses or computer domain names used by the users that connect to the website, URI (Uniform Resource Identifier) addresses of requested resources, the request time, the method used to submit the request to the server, the file size received in response, the numeric code indicating the status of the response given by the server (successful outcome, error, etc.) and other parameters relevant to the operating system and the user's IT environment. Data is used only to extract anonymous statistic information on the use of the website and to control its correct functioning and is cancelled immediately after having been processed. Data could be used to ascertain responsibility in case of hypothetical IT violations to the website. Data provided voluntarily by the user. The facultative, explicit and voluntary sending of an email to the indicated addresses on this website, together with the completion of forms that send specific requests, entail the subsequent acquisition of the sender's address, necessary to reply to the requests, and any other personal data written in the letter or form. Specific synthesis information is provided or visualized in the website pages, provided only for particular services on demand.

## Consequences of the refusal to provide data

Apart from what has been specified for browsing data, the user is free to provide personal data reported in the request forms, to subscribe to a mailing list, to send a CV or however indicated in contacts to solicit the sending of information, technical or commercial material or any other kind of communication. Refusing to provide data may entail the impossibility of obtaining the requested information.

## Processing Methods

Data is processed mainly via IT means and memorized on both IT and paper supports and on any other suitable support, in accordance with methods as per articles 6, 32 of the GDPR and through the adoption of the suitable security measures provided for to prevent data loss, unlawful or incorrect uses and unauthorized access. We inform you that, to provide a complete service, our portal may contain links to other websites not managed by us. We are not responsible for errors, contents, cookies, publishing of unlawful moral content, advertisements, banners or files not compliant with the regulations of applicable law and not in accordance with the Privacy policy of websites managed by us on websites which we refer to. To improve the offered service we would appreciate an immediate advisory with comments on malfunctioning or abuses as well as suggestions to the following email address: [amministrazione@todo.to.it](mailto:amministrazione@todo.to.it). Your data will be processed only by personnel strictly authorized by the Data Controller.

## Processing Purpose

Processing will be carried out for the following purposes:

- To manage the sent CVs;
- To give the opportunity to access the public and/or confidential sections of the website;
- To execute the activation and maintenance of any possible services subscribed on-line or to
- Send newsletters;
- To process requested information, quotations, technical support;
- To provide information on provided services and products and variations of products or
- services;
- To fulfill the obligations required by laws and regulations;
- To protect the Data Controller in front of the Court;
- To permit constant supervision on the effectiveness of the proposed service.

## Subjects to whom personal data is communicated

Personal data concerning the processing in question can be communicated only to subjects to whom the faculty of accessing your personal data is recognized by applicable law or secondary and/or community regulation. Your data can be communicated only to competent subjects who are duly appointed for the fulfilment of the necessary services for the correct management of the relationship, guaranteeing the protection of the rights of the interested party. Also some data can be communicated and diffused to internet operators which TODO SRL employs for the management of its domains. Your personal data will not be disclosed in any way. Your data can also be transferred, insofar to the purposes mentioned above, in the following countries: EU countries and the United States of America.

## **Length of time personal data can be stored**

We inform you that in accordance with principles of fairness, limitation of the purposes and data minimization, in accordance with article 5 of the GDPR, the storage period of your personal data is a necessary period for carrying out of the requested services and in fulfillment of the applicable law concerning fiscal, tributary and contract documentation.

## **Rights of the interested parties**

Reg.to UE 2016/679: Artt. 15, 16, 17, 18, 19, 20, 21, 22 – Rights of the interested parties

1. All those concerned parties have the right to obtain a confirmation as to the existence or not of personal data that interests them, even if they are not registered yet, and its communication in an intelligible form.
2. All the interested parties have the right to obtain indication as to:
  - a. the origin of personal data;
  - b. the purposes and methods of processing;
  - c. the applied logic in case of the processing carried out with the help of electronic tools;
  - d. the personal details of the Data Controller, of the people in charge and the appointed representative according to article 5(2);
  - e. the subjects or subject categories to whom personal data can be communicated or that can come to the attention of it, in capacity as designated representatives in the state's territory, of the subjects in charge or appointed.
3. The interested parties have the right to obtain:
  - a. The updating, rectification and, when interested, integration of data;
  - b. The cancellation, anonymous transformation or interruption of data processed in violation of the applicable law, comprising that of which storage is not necessary in relation to the purposes for which data has been collected or processed at a later time;
  - c. The declaration that the operations described in items a) and b) have been brought to the attention of, also in content, those to whom data has been communicated or disclosed, except in the case that such fulfillment is impossible to carry out or entails the use of means;
  - d. Manifestly disproportionate compared to the protected right;
  - e. Data portability.
4. The interested parties have the right to oppose, completely or partly:
  - a. for reasons legitimate to data processing that concern the interested parties, even though pertinent to the purpose of the collection;
  - b. personal data processing that concerns them for the purpose of sending material regarding advertising, direct sales or research;
  - c. market or commercial communication.

## **The data controller**

The Data Controller is TODO SRL – in the person of the company's pro tempore legal representative. The user has the right to obtain from the Data Controller the cancellation (right to be forgotten), limitation, update, correction, portability or opposition to the processing of personal data concerning you, and in general the user can exercise all the rights provided for by articles 15, 16, 17, 18, 19, 20, 21, 22 of the GDPR. To exercise the above listed rights, the interested party has to send a written request via e-mail. The e-mail has to be sent to: [amministrazione@todo.to.it](mailto:amministrazione@todo.to.it).

## Cookie Policy

Cookies are small files that are stored on a visitor's computer or other device's hard disc by the provider online of the website. Cookies can collect information on the visitor's habits on their use of the said website, by registering the activities of their computer or other device on that website, for example when purchasing goods.

## Cookies can be

### Owner's Cookies (also known as first party)

The owner's cookies are cookies that are saved directly in the computer or other device. They can include cookies such as session and persistent ones (described below). The owner cookies can be used to follow the movements carried out by the visitor's computer or other device when browsing the website, eg for analysis purposes.

### Third-Party Cookie

Third-party cookies are cookies managed by third parties who can collect and trace some browsing data. This website uses Google Analytics services (described in browsing and statistical data collected by third parties).

### Session Cookies

The duration between the time when the Internet browser opens and the time when you close it is called browsing session. Session cookies are memorized in the visitor's computer or other device during a browsing session, but expire and are normally eliminated at the end of a browsing session.

### Persistent Cookies

Persistent cookies are cookies memorized in the visitor's computer or other device during a browsing section, which are stored in the computer or other device after the end of said browsing session (eg password recording). Persistent cookies allow the websites to recognize the visitor's computer or other device when it is used to access one of our websites again, after the end of a browsing session and at the beginning of a new browsing session, with the purpose of essentially helping the visitor reconnect to our website rapidly. Due to strictly technical reasons, this website uses the following types of cookies:

- Technical and session cookies are used e.g. to prevent, where expected, the user to insert the password repeatedly to access reserved sections of the website, or to memorize the favorite browsing language, or to memorize some technical characteristics of the browser used for browsing (including the acceptance of cookies).
- Third-party (googleanalytics) ones to measure the access statistics to this website (in aggregate form) and googlemaps to indicate the office's location.
- The use of cookies can be disabled, but by choosing that option it is likely that the website will present some malfunction, more or less evident depending on the website section that one wants to visit.

## **Block/Limit Cookies**

It is possible to limit cookies by modifying the browser settings (see handbook below):

For Internet Explorer:

Click “tools” in the top part of the browser window and select “Internet Options.” In the options window, access the “Privacy” form. To enable cookies, set the cursor to “Media” or low values. To block all cookies, set the cursor to higher values.

For Firefox:

Click “tools” in the browser menu and select “Options.” Select the “Privacy” panel. Enable cookies by selecting “Accept cookie from websites.” To disable cookies, de-select “Accept cookie from websites.”

For Chrome:

Click the spanner icon in the browser’s toolbar. Select Settings. Click “Show advanced settings.” In the “Privacy” section, click the “Content settings” button. To enable cookies in the “Cookie” section, select “Allow local data to be set;” in this way both first and third- party cookies will be activated. To enable only first-party cookie, select “Block all third-party cookies, with no exception.” To disable cookies, in the “Cookie” section choose “Prevent website to set data.”

For Safari:

if it is not already open, start Safari. Click Safari>Preferences, then click on Privacy. In the “Block cookies” section, specify if Safari has to accept cookies from websites and when. For information on options, click on Computer and then on Details. To view which websites store cookies on the computer, click Details.

For all other browsers and mobile devices:

To limit cookies on any other browser or mobile device, visit the official web page of the producer of the device or browser or consult the provided relevant documentation.

Further information:

For further information on cookies and their use, visit: All About Cookies: [www.allaboutcookies.org](http://www.allaboutcookies.org) Wikipedia: [http://en.wikipedia.org/wiki/HTTP\\_cookie](http://en.wikipedia.org/wiki/HTTP_cookie) Any requests relevant to data inherent to this processing can be sent to the Data Controller (Google Inc.).

## **Browsing and statistics data collected by third parties**

As is now common Internet practice, this website uses tools of statistical analysis issued and managed by third parties that can collect and “trace” some Internet browsing data. Due to the fact that it is collected by different tools and companies, such data is not physically in TODO SRL’s possession, as TODO SRL can use it only for consultation purposes, but cannot modify or cancel it autonomously. For those operations and to know in depth the applied privacy policy to such data it is necessary that the user turn to the Data Controller, i.e. the company directly issuing the used statistic service. The tools belonging to third parties used within this website are the following:

- Google Analytics and Google Maps (both issued by: Google Inc. 1600 Amphitheatre Parkway
- Mountain View CA 94043, USA)

## **Information related to google analytics**

This website uses Google Analytics, a web analysis service provided by Google, Inc. (“Google”). Google Analytics uses “cookies,” i.e. text files that are deposited on your computer to allow the website to analyse how users interact with the website. The information generated by cookies on your use of the website (including your IP address) will be transmitted to, and deposited in, Google servers in the United States. Google will use this information to trace and examine your use of the website, compile reports on website activities for website operators and provide other services relevant to the website activities and the use of the Internet. Google can also transfer this information to third parties when obligated by applicable law or where those third parties process the said information on behalf of Google. Google will not associate your IP address to any other data possessed by Google. You can refuse to use cookies by selecting the appropriate setting on your browser, but that can prevent you from using all the functionalities of this website. By using this website, you give consent to the processing of your data by Google according to the above mentioned methods and purposes. Useful addresses for a better understanding of Google Analytics privacy policy:

<http://www.google.com/analytics/terms/it.html> <http://www.google.com/privacypolicy.html>

If you do not wish for your data to be collected by Google Analytics, you can download the official “opt out” plugin for your browser, by clicking [here](#). Any requests relevant to data inherent to this processing can be sent to the Data Controller (Google Inc.).