

# Filados-Gabac SA

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## **Privacy Policy pursuant to the New Federal Law Pursuant to art. 6 and art. 19 LPD**

Filados-Gabac SA (P.IVA CHE-108.012.734), in the person of its legal representative pro tempore, with registered office in Via Girella, 20 - 6814 Lamone (Ticino), as Data Controller, informs you that, in compliance with the new Federal Data Protection Act (FADP) which governs and regulates the protection of personal data and their free circulation, your personal data will be processed in accordance with the aforementioned Federal Law, based on the principles of correctness, lawfulness, proportionality of interests and transparency as well as the protection of your privacy and your rights, for the purposes, with the methods and for the terms better indicated below.

### **- 1- Purposes, methods and legal bases of data processing**

This privacy policy applies exclusively to the online activities of this site and is valid for visitors/users of the site. It does not apply to information collected through channels other than this website [www.filados-gabac.ch](http://www.filados-gabac.ch). The purpose of the privacy policy is to provide maximum transparency regarding the information that the site collects and how it uses it.

Your personal data will be processed exclusively for purposes strictly connected, instrumental and necessary to the fulfillment of the obligations inherent to the relationships with our Company; in particular:

The processing of personal data is carried out through the operations of collection, registration, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, cancellation and destruction.

The processing of personal data will be carried out via computer media by the owner, the manager/managers and the authorized persons (appointed) with the observance of every precautionary measure, which guarantees its security and confidentiality. The data will not be subject to profiling.

The data will be stored by the data owner and by the data controllers designated by the data owner. In any case, your personal data will be stored and processed within the borders of the Swiss Confederation and will be transferred outside of this border only with your explicit consent.

In the event that you provide comments and/or personal data for the request of information and/or specific services requested by the user (for example and not limited to request for commercial information, registration on our portal, registration for our newsletter), such data are understood to be voluntarily provided by the user at the time of requesting the provision of the service. By inserting a comment or other information, the user expressly accepts this privacy policy.

The data received will be used exclusively for the provision of the requested service and only for the time necessary to provide the service.

The information that users of the site will deem to make public through the services and tools made available to them, are provided by the user knowingly and voluntarily, exempting this site from any liability regarding any violations of the laws. It is up to the user to verify that they have permission to enter personal data of third parties or content protected by national and international laws.

The data collected by the site during its operation are used exclusively for the purposes indicated above and stored for the time strictly necessary to carry out the specified activities. In any case, the data collected by the site will never be provided to third parties, for any reason, unless it is a legitimate request by the judicial authority and only in the cases provided for by law.

### **- 2- Nature of data collection and consequences of any failure to provide data**

Like all websites, this site also uses log files in which information collected automatically during user visits is stored. The information collected could be the following:

- internet protocol (IP) address;
  - type of browser and parameters of the device used to connect to the site;
  - name of the Internet service provider (ISP);
  - date and time of visit;
  - web page from which the visitor came (referral) and exited;
  - possibly the number of clicks.
- Your email address in case you decide to subscribe to our newsletter, for which your explicit consent will still be required.

The above information is processed automatically and collected in an exclusively aggregated form in order to verify the correct functioning of the site, for security reasons and for the legitimate interests of the owner provided for by current legislation. For security purposes (spam filters, firewalls, virus detection), the automatically recorded data may also include personal data such as the IP address, which could be used, in accordance with the laws in force on the matter, in order to block attempts to damage the site itself or to cause damage to other users, or in any case harmful or criminal activities. Such data is never used for the identification or profiling of the user, but only for the purposes of protecting the site and its users and the legitimate interests of the Owner in data processing. By using or consulting this site, visitors and users explicitly approve this privacy policy and consent to the processing of their personal data in relation to the methods and purposes described below, including any disclosure to third parties if necessary for the provision of a service. Providing data and therefore consent to the collection and processing of data is optional, however denying consent may make it impossible to provide certain services and the browsing experience on the site may be compromised.

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Consent to the use of your data for marketing and/or advertising purposes (sending e-mails and/or communications with advertising offers, newsletters) is optional and requires, in addition to the provision of your personal data, an explicit request via the opt-in function on this website.

## **- 3- Timings and terms**

The Data Controller, the managers and the subjects authorised to process the data (appointees) will process the personal data for the time necessary to fulfil the purposes set out above and, in any case, for no more than 10 years from the termination of the relationship where foreseen or required by current legislation. With regard to the provision of data by you for the receipt of commercial information, newsletters and periodic information, the data will be processed until you request to unsubscribe.

## **- 4- Communication and dissemination of data**

Your personal data, for the purposes of executing the contract or the services requested by you and for the purposes indicated above, may be communicated:

- to all natural and legal persons (for example and not limited to legal, administrative, tax consultancy firms, auditing firms, couriers and freight forwarders, data processing centres, IT consultants, suppliers, etc.) in cases where communication is necessary for the purposes illustrated above;
- to banking institutions for the management of collections and payments;
- to factoring or debt collection companies;
- to our collaborators and employees specifically appointed and within the scope of their respective duties.
- to SMTP providers for sending newsletters

## **- 5- Rights of the interested party**

By calling +41919661314 or writing to [info@filados-gabac.ch](mailto:info@filados-gabac.ch) you may at any time exercise your rights towards the data controller (Data Controller) pursuant to the Federal Law on the Protection of Personal Data LPD which we reproduce for your convenience.

The interested party has the right to obtain confirmation of the existence and/or the fact that the processing of personal data concerning him/her is in progress, even if not yet registered, as well as their communication in an intelligible form. The interested party has the right to obtain the indication:

- of the origin of the personal data (with particular regard to the case in which the same are not collected from the interested party and, in the case of transfer of data to a third country, of the existence of adequate guarantees, of the purposes and methods of the processing;
- of the logic applied in case of processing carried out with the aid of electronic instruments;
- of the identifying details of the Data Controller, the persons in charge and the designated representative;
- of the subjects or categories of subjects to whom the personal data may be communicated or who may become aware of them in their capacity as designated representative in the territory of the State, as managers or authorised subjects;
- of the categories of personal data being processed;
- of the period for which the data will be retained or the criteria used to determine that period;
- of the existence of automated decision-making processes, with particular regard to profiling, and of the logic applied thereto;
- the right to obtain a copy of the personal data being processed;

The interested party also has the right to obtain:

- the updating, rectification or, when there is interest, the integration of the data;
- the cancellation, transformation into anonymous form or blocking of data processed in violation of the law, including data whose retention is not necessary in relation to the purposes for which the data were collected or subsequently processed;
- the certification that the operations referred to in letters a) and b) have been brought to the attention of the parties, also with regard to their content, of those to whom the data has been communicated or disseminated, except in the case in which such fulfillment proves impossible or involves the use of means manifestly disproportionate to the right protected;
- the portability of data to other subjects for which an explicit request must be made to the following addresses +41919661314, [info@filados-gabac.ch](mailto:info@filados-gabac.ch)
- the deletion of data from our archives (cd. right to be forgotten), by communicating to +41919661314, [info@filadosgabac.ch](mailto:info@filadosgabac.ch)
- to limit the processing of data pursuant to the Federal Act on Data Protection (FADP)

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The interested party has the right to oppose, in whole or in part, the processing of data:

- for legitimate reasons and related to his particular situation, even if the processing is relevant to the purpose of the collection;
- to the processing of personal data concerning him/her for the purpose of sending advertising or direct sales material or for carrying out market research or commercial communication;
- to the processing of data including profiling on the basis of these provisions.

If the data processing is based on the consent of the interested party, the latter has the right to revoke such consent at any time by making an explicit request to the following addresses +41919661314, info@filados-gabac.ch .

Furthermore, the interested party has the right to lodge a complaint with the Supervisory Authority.

The exercise of the aforementioned rights may be exercised by making a request to the Data Controller or the Data Processor, transmitted by telephone, by email to the addresses indicated above or even by registered letter with return receipt.

## ***Consent of the interested party***

By requesting your express consent to the processing (which we will however consider to have been given orally in the event of failure to return this signed document), we will consider you, from now on, informed about the processing carried out by us, pursuant to and for the purposes of the Federal Law on Data Protection LPD.