

# Privacy Policy for Users of [www.pse-group.com](http://www.pse-group.com) Art. 13 Reg Art. 13 Reg. UE 2016/679 (“GDPR”)

## What is this privacy policy?

Personal data are processed through the website [www.pse-group.com](http://www.pse-group.com) (“Website”) according to the law and the rules on confidentiality and security, which inspired the Controller.

This privacy policy contains the information to understand which data are processed and why.

## Controller

The Controller is Precision Spring Europa S.p.A., C.F. and VAT number 723660155, 20056 Grezzago (MI), Via Umbria n. 4.

The Controller can be contacted as follows:

- e-mail: [privacy@pse-group.com](mailto:privacy@pse-group.com)
- telephone: +39 02 9201941
- mail: 20056 Grezzago (MI), Via Umbria n. 4
- by using the contact form you can find here

## Processing and purpose

The User’s personal data – e.g. IP address, device, browser, name and surname, contact information – are used for:

- TECHNICAL MANAGEMENT: it is the systematic efforts used to enable the Website’s navigation and functionalities.
- COMMUNICATION MANAGEMENT: it allows the Controller to contact the User in case of request via e-mail or any other means of communication.
- LEGAL OBLIGATION: it allows the Controller to fulfil the legal obligations to which it is subject.

## Legal basis and data retention

PURPOSE	LEGAL BASE	DATA RETENTION
Technical management	Processing is necessary for the purpose of the legitimate interest (e.g. the Website can correctly be used).	As long as it is necessary to render a page of the Website or to execute a script.
Communication management	Processing is necessary for the performance of the contract.	No longer than 5 years since the provision of the service.
Legal obligation	Processing is necessary for compliance with a legal obligation.	No longer than 10 years since the last contact with the User.

The data retention period can be increased in case of litigation with other users or with third parties.

## Data processing

The Controller respects the principles of lawfulness, fairness and transparency. It guarantees the confidentiality and rights of the data subjects and therefore adopts the necessary means.

The Controller treats the data subjects’ personal data with manual, IT and telematic tools within the Purposes.

## Transmission of data

The provision of the data indicated as mandatory is necessary to make the Website work.

If those data are not provided, the Website could work not correctly (E.g. if the e-mail address is missing in the contact form, the Site does not send any communication due to the Controller's impossibility to reply).

### **Data processing and disclosure**

- Personal data are only processed by the Controller's employees and co-workers or by third parties designated by the Controller as Processors – E.g. business consultants, webmasters, etc.
- The personal data won't be disseminated, except for the case of the explicit consent of the data subject.

Data can always be processed whether it is necessary for compliance with a legal obligation.

### **Transfer of personal data to third countries**

Personal data might be transferred to third countries in order to provide effective protection to the rights of the data subjects, as it is determined under the European standard clauses about the protection of data.

These transfers are limited to what is necessary in relation to the technological means, namely:

- management of the Website requests, through the CloudFare's CDN (for any further information you can visit this page)
- protection from unwanted communications or SPAM, through Google ReCaptcha v.3
- anonymized statistics data, through Google Analytics

For any further information, you can see the Website cookie policy

### **Rights of the data subject**

The User can exercise any right provided under the GDPR and under the national law, namely:

- access to his/her own personal data
- rectification or erasure of personal data
- the restriction of processing
- the right to object
- data portability, where required
- withdraw consent, where required. The withdrawal of the consent shall not affect the lawfulness of processing based on consent before its withdrawal.
- right to lodge a complaint with a supervisory authority

These rights can be exercised by sending a request using the aforementioned channels.