



PRIVACY POLICY ON THE PROCESSING OF PERSONAL DATA OF WWW.REPI.COM

According to the Federal Data Protection Act (FDPA), we provide you with the necessary information regarding the processing of personal data collected and processed **during your experience on our website www.repi.com**.



1. CATEGORIES OF PERSONAL DATA PROCESSED | DEFINITIONS

The personal data provided by you - or otherwise acquired in compliance with the legislative and contractual provisions in force - inherent in, connected with and/or instrumental to the assessment of your experience on our website, will be processed in compliance with the provisions of the FDPA and the obligations of confidentiality.

Personal Data: all information relating to an identified or identifiable person. In particular, **we will process the following personal data:** browsing data (for information on data collected through cookies, please see our Cookie Policy); data provided voluntarily by the user (when sending the form in the "Contacts" area of our website, such as: name, surname, email address, telephone number).

We specify that the computer systems responsible for the operation of this website acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols. This category of data includes IP addresses or domain names of the computers and devices used by users, the addresses in URI/URL (Uniform Resource Identifier/Locator) notation of the resources requested, the time of the request, the method used in submitting the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the user's operating system and computer.

Data subjects: natural or legal persons whose data is processed (also referred to as "you").

Processing: any operation with personal data, irrespective of the means applied and the procedure, and in particular the collection, storage, use, revision, disclosure, archiving or destruction of data.

Disclosure: making personal data accessible, for example by permitting access, transmission or publication.



2. IDENTITY AND CONTACT DETAILS OF THE DATA CONTROLLER

The company that determines the purposes and means of this processing of personal data is **FERLINE SA**, a company under Swiss law with registered office in 6900 Lugano, via Pasquale Lucchini 2, VAT no CHE-382.515.192 (also referred to as "Ferline" or the "Data Controller" or the "Company" or "we").

The contact details of the Data Controller are as follows: privacy.ferline@repi.com



3. PURPOSES OF THE PROCESSING | DATA RETENTION PERIOD

PURPOSE OF THE PROCESSING JUSTIFICATION	DATA RETENTION PERIOD
a) Activities strictly necessary for the navigation on this website, and to control website's correct functioning.	Data will be retained until the end of the browsing session. For personal data processed with technical cookies, please read our Cookie Policy.
b) Obtaining anonymous statistical information on the use of the website.	Please read our Cookie Policy.
c) Reply to requests received through the "Contact" area, on this website.	Data will be kept for as long as necessary to achieve the purpose and, in any case, no longer than 10 years in case a commercial relationship is started.
d) Direct marketing activities (upon consent) by automated means.	Data will be retained until you withdraw your consent.

3.1 MEANS OF DATA PROCESSING

The processing will be carried out in automated and/or manual form, using methods and tools designed to ensure maximum security and confidentiality, by subjects specially trained to do so. The personal data collected will be kept in a form that allows the identification of data subjects for a period of time not exceeding the achievement of the purposes for which the personal data are processed.



4. RECIPIENTS OF PERSONAL DATA

We may share your personal information with employees and/or staff acting under the Data Controller's authority (duly instructed for the former purposes), as well as third parties contractually linked to Ferline, in order to fulfill contractual obligations and achieve one or more of the aforesaid purposes of processing. Such third parties will process your data in their capacity as data processors, or as independent data controllers. More in detail, we may share your personal information to the following categories of recipients: a) subjects who provide services related to the functioning of this website, the information system of Ferline and the telecommunications networks (e.g., hosting provider, webmaster); b) firms or companies within the scope of assistance and consultancy relations (e.g. web agencies); c) competent Authorities for the fulfilment of legal obligations and/or provisions of public bodies, upon request; d) Repi Group companies including those having seat outside the Swiss Confederation.



5. TRANSFERS OF PERSONAL DATA OUTSIDE THE CONFEDERATION

This website is hosted in Switzerland. According to the choice of the user, personal data inserted in the Contact form may be communicated to one of the Repi Group companies based outside the Swiss Confederation. In such a case, this data transfer will be performed in accordance with the provisions of the FDP, specifically on one of the following grounds:

- in the presence of appropriate guarantees, in particular contractual measures, which ensure adequate protection abroad;



- the processing is in direct connection with the conclusion or performance of a contract and the data processed concern the other contracting party;
- the communication takes place within the same legal entity or company or between legal entities or companies under a single management, provided that the issuer and recipient are subject to data protection rules ensuring adequate protection.



6. RIGHTS OF THE DATA SUBJECT

According to the conditions established by the FDPA, the Data Controller acknowledges the following rights to you as a Data Subject (non-exhaustive list):

- to obtain confirmation from the data controller as to whether or not personal data concerning him or her are being processed, and if so, to obtain access to the personal data (Access);
- to obtain the rectification of inaccurate or obsolete personal data;
- to be informed in writing and free of charge if personal data concerning you are being processed;
- to revoke the consent to the processing of data that you have previously given;
- prevent the communication to third parties of sensitive personal data;
- to obtain the portability of personal data or to demand their transmission to a third party;
- to request the restriction or blocking of data processing, the prevention of data disclosure to third parties or rectification or destruction of personal data;
- the right to request that a given processing of personal data be prohibited, that a given communication of personal data to third parties be prohibited, or that certain personal data be deleted or destroyed;
- if neither the correctness nor the inaccuracy of the personal data can be proved, to request that a note be added to the data to indicate its disputed nature;
- to request that the rectification, destruction, blocking, in particular the communication to third parties, as well as the mention of the disputed character or the judgment be communicated to third parties or published;
- to have the unlawfulness of the processing of personal data declared.

With the exemption of any other administrative or jurisdictional remedy, if the user considers that the processing of his or her data breaches the provisions of the FDPA, he or she has the right to file a complaint with the competent supervisory authority (i.e. the Federal Data Protection and Transparency Commissioner).

You may exercise your rights under the FDPA by contacting the Data Controller by writing at the above-indicated contacts. To unsubscribe from our newsletter service (direct marketing) you can also use the automatic unsubscription tools provided.



7. ADDITIONAL INFORMATION | MODIFICATIONS | UPDATES

Data security

We take appropriate technical and organizational measures to ensure a risk-adequate level of protection in accordance with Article 8 DPA and Articles 1, 2, 3 OPDa, taking into account the state of the art, implementation costs, and the nature, scope, circumstances, and purposes of the processing, as well as the varying likelihood and severity of the risk to the rights and freedoms of natural persons.

Amendments and updates

The Data Controller reserves the right to revise, update, add or remove any part of this privacy policy at its discretion at any time. If changes are made, the date of update will be indicated.

Date of last update: 11/11/2024