Privacy Policy

Document		Review	Issue Date
Privacy Policy		1	April 2025
Drafted	**Verified**	**Approved**	
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This Privacy Policy of Growermetal S.p.A. (hereinafter, "**Growermetal**") fulfils the information function pursuant to Article 13 of Regulation (EU) 679/2016, *concerning the protection of individuals with regard to the processing of personal data, as well as the free movement of such data (hereinafter, "**GDPR**").*

1. DATA CONTROLLER

The data controller is Growermetal, with registered office in Via Nazionale no. 3, 23885, Calco (LC); telephone: + 39 039 9535300; e-mail address: gdpr@growermetal.com.

2. DEFINITION OF "PERSONAL DATA"

For the purposes of this Privacy Policy, "personal data" – in accordance with Article 4 of the GDPR – means "*any information concerning an identified or identifiable natural person ("data subject"); an identifiable natural person is one who can be identified, directly or indirectly, with particular reference to an identifier such as a name, an identification number, location data, an online identifier or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person*".

This Privacy Policy applies exclusively to personal data collected through the website www.growermetal.com (hereinafter, the "**Site**") or by the other ways indicated in this policy. This Privacy Policy does not apply to other websites owned by third parties, which can be accessed via links on the Site. Please read the privacy policies of these third-party sites in relation to the processing of personal data carried out by them.

3. TYPES OF DATA PROCESSED

3.1. Browsing data

The computer systems and software procedures that support the functioning of the Site automatically acquire some personal data during their normal use. The data acquired includes the IP addresses of the devices used to access the Site, the URI (Uniform Resource Identifier) addresses of the resources requested, the time of the request, the method used to send it to the server, the size of the response file, the numerical code indicating the status of the server's response (e.g., successful completion or error), and additional parameters related to the user's operating system. Such data, although not collected for this purpose, if combined with other information held by third parties, could allow the identification of users. Growermetal uses this information solely to generate anonymous statistics on the use of the Site and to verify its correct functioning, deleting them immediately after processing.

3.2. Use of cookies

The Site uses cookies in accordance with our Cookie Policy.

4. DATA PROVIDED VOLUNTARILY BY THE INTERESTED USER

Users may voluntarily provide certain personal data (such as name, surname, e-mail address, telephone number, postal address, job title, etc.) through specific registration forms available online, through the email addresses available on the site, or directly through interactions of any kind with Growermetal staff.

Regarding the data of those who send applications to Growermetal, in addition to this policy, please refer to the specific information for candidates available at the following **link**.

https://growermetal.com/privacy-policy-per-i-candidati/

5. PURPOSES AND METHODS OF PROCESSING

Growermetal processes personal data voluntarily provided by the user exclusively in relation to:

1. requests for information or contact sent by the user himself;
2. the user's subscription to personalized information services on Growermetal activities (newsletters, event updatess, career opportunities).

Growermetal is committed to protecting your personal data by taking appropriate technical and organizational measures, in accordance with the GDPR. The data will be processed exclusively for the purposes indicated in this policy and stored for the period strictly necessary.

6. LEGAL BASIS OF THE PROCESSING

In relation to the processing of personal data related to requests for information or contact transmitted by the user, Growermetal will process personal data as necessary for the execution of pre-contractual measures adopted at the user's request and for the limited needs aimed at satisfying or responding to your requests.

In connection with your subscription to personalized information services about Growermetal activities:

- users can subscribe to our newsletter to receive updates on news related to Growermetal or events organized by the latter.
- the user may receive information about events and initiatives concerning Growermetal on the basis of Growermetal's legitimate interest in maintaining contact with the user if he has previously signed up for one of our events or newsletters (also considering your reasonable expectations), without prejudice to the right to object ("*opt-out*"); or
- the user has had contact with Growermetal or its staff (e.g. by exchanging business cards or other contact manifesting active interest behavior towards Growermetal) may be registered, based on Growermetal's legitimate interest to stay in touch, to distribution lists relating to events or initiatives that Growermetal believes may be of interest to it (including considering your reasonable expectations), without prejudice to the right to object ("*opt-out*").

7. OPTIONAL NATURE OF THE PROVISION OF PERSONAL DATA

Except as specified for navigation data, the user has the right to provide or not provide their personal data in the forms for registration on the Site or by e-mail. In all cases, the provision of data is mandatory as failure to provide data would make it impossible for Growermetal to send the requested articles, newsletters and information requested.

8. COMMUNICATION AND DISSEMINATION OF PERSONAL DATA – TRANSFER ABROAD

The personal data collected will be accessible to Growermetal employees and consultants formally designated as data controllers or persons in charge/authorized of the processing. Some data may be communicated anonymously and aggregated to third parties for statistical purposes. In any case, this data does not allow the identification of users. Except as permitted by law, or provided for in this policy, personal data will not be communicated or disclosed without the user's consent.

9. RIGHTS OF INTERESSTED USERS WITH REGARD TO THEIR PERSONAL DATA

The user has the right to obtain confirmation of the existence of your personal data at any time, to request that it be sent in a structured, commonly used and readable format in order to transmit it to another data controller, as well as to request their integration, updating or rectification. The user also has the right to request the deletion of their personal data at any time, to request the limitation of processing, as well as to oppose, in whole or in part, for legitimate reasons, their processing. In particular, the user has the right to object at any time to the processing of personal data concerning you processed for direct marketing purposes, and he can also exercise this right by clicking in the appropriate section contained within each communication. The exercise of these rights may, however, be subject to limitations or exclusions under the GDPR and applicable law. Where the processing is based on consent, it is understood that the user has, at any time, the right to revoke his consent, without this affecting the lawfulness of the processing carried out before the revocation.

10. COMPLAINT

Without prejudice to any other administrative or jurisdictional appeal, where the user believes that the processing of their personal data violates the legislation on the protection of personal data, the latter has the right to lodge a complaint, a report or an appeal to the Guarantor for the protection of personal data.

11. CHANGES TO THIS PRIVACY POLICY

Growermetal may update this policy to adapt it to any changes in national and/or EU legislation, technological innovations or other business needs. Updated versions of the policy will be published on the Site. Users are invited to consult this information regularly to check for any changes or updates.

12. EXERCISE RIGHTS AND REQUEST OF INFORMATION

To exercise their rights and for any other questions or requests relating to the processing of their personal data by Growermetal, users can contact Growermetal at the addresses indicated in this policy and in particular at the following e-mail address: gdpr@growermetal.com.