PRIVACY NOTICE PURSUANT TO ARTICLE 13 OF GDPR 2016/679
INFORMATION ON THE PROCESSING OF PERSONAL DATA COLLECTED FROM THE DATA SUBJECT

In accordance with the provisions of EU Regulation 2016/679 (General Data Protection Regulation – GDPR), we hereby provide you with the required information concerning the processing of the personal data provided. This Privacy Notice is provided pursuant to Article 13 of EU Regulation 2016/679 (General Data Protection Regulation).

TYPES OF DATA PROCESSED / THAT MAY BE PROCESSED

Data processed / that may be processed: "personal data".
Pursuant to Article 4 of GDPR 2016/679, "personal data" means "any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person" (Recitals 26, 27 and 30).

User Data

Browsing Data

The IT systems and software procedures used to operate this website acquire, during their normal operation, certain personal data whose transmission is implicit in the use of Internet communication protocols.
This information is not collected for the purpose of being associated with identified data subjects; however, by its very nature, it could, through processing and association with data held by third parties, make it possible to identify users.
This category of data includes the IP addresses or domain names of the computers used by users connecting to the website, the URI (Uniform Resource Identifier) addresses of the requested resources, the time of the request, the method used to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the response provided by the server (successful, error, etc.), and other parameters relating to the user's operating system and IT environment.

Data Provided Voluntarily

The optional, explicit and voluntary sending of messages to the contact addresses indicated on this website and/or the completion of data collection forms entails the subsequent acquisition of the data necessary to respond to the requests received.

COOKIES For information regarding cookies and similar technologies, please refer to the Cookie Policy available in the footer of the website. For non-technical cookies and similar technologies, the legal basis for processing is consent pursuant to Article 6(1)(a) of the GDPR.

DATA CONTROLLER Pursuant to Article 4 of EU Regulation 2016/679, the Data Controller is **FACOM SRL A SOCIO UNICO**, with registered office at Via Pio La Torre 32-34-36, 60022 Castelfidardo (AN), Italy, Tel. 0717822571, email: contab@facom.it, represented by its legal representative pro tempore.

DATA PROTECTION OFFICER A Data Protection Officer (DPO) has not been appointed, as the processing activities carried out do not fall within the cases for which such appointment is mandatory pursuant to Article 37 of the GDPR.

PURPOSES OF PROCESSING

A) Browsing this website

- **LEGAL BASIS**
  Pursuant to Article 6(1)(f) of GDPR 2016/679, the legal basis for processing is **legitimate interest**: "processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child." In this specific case, the legitimate interest consists of the activities strictly necessary for the operation of the website and for providing the website browsing service.
- **RETENTION PERIOD**
  For the duration of the browsing session, without prejudice to any need for the Judicial Authority to investigate criminal offences.
- **NATURE OF THE PROVISION OF DATA**
  The provision of data is necessary in order to browse the website.

B) Completion of the Contact Form

Following completion of the contact form available on the website by the Data Subject, the company will process the data in order to respond to the requests submitted.

Please note that completion of the Form is prohibited for users under the age of 14 (or users considered minors under the laws of their country of residence). If users do not meet the applicable age requirements, they must not enter their personal data in the Form.

- **LEGAL BASIS**
  Pursuant to Article 6(1)(b) of the GDPR, processing is necessary in order to take **steps at the request of the Data Subject prior to entering into a contract**.
- **RETENTION PERIOD**
  The data will be retained until the request has been dealt with and, in any event, for no longer than 1 year.
- **NATURE OF THE PROVISION OF DATA**
  The provision of data is optional. However, failure to provide, or incomplete provision of, the data indicated as necessary will make it impossible for the company to process and respond to the request.

C) Sending Commercial, Promotional and Advertising Communications Relating to the Data Controller's Products and Services

Following completion by the Data Subject of the mailing list subscription form, the company – subject to the Data Subject's explicit consent and until such consent is subsequently withdrawn – will collect contact details for the purpose of sending commercial and promotional information, newsletters and conducting market research for marketing purposes.
These activities will also be carried out through automated means (email and SMS). Please note that the Form is not intended for visitors under the age of 14 or for persons who have not reached the age of majority under the laws of their jurisdiction of residence. If you do not meet the specified age requirements, please do not enter your personal data in the Form.

- **LEGAL BASIS**
  Pursuant to Article 6(1)(a) of GDPR 2016/679, the legal basis for processing is the **Data Subject's consent**: "the data subject has given consent to the processing of his or her personal data for one or more specific purposes."
- **RETENTION PERIOD**
  The data will be retained until consent is withdrawn (opt-out).
- **NATURE OF THE PROVISION OF DATA**
  The provision of data for this purpose is optional. If consent is not provided, the data supplied will not be used for the activity in question. Failure to provide consent will not affect the other purposes described in this Privacy Notice.

Any subsequent withdrawal of consent previously given shall not affect the lawfulness of processing based on consent before its withdrawal (see Article 7(3) of the GDPR).

RECIPIENTS OR CATEGORIES OF RECIPIENTS OF THE DATA
The personal data provided will be disclosed to recipients who will process the data as processors pursuant to Article 28 of EU Regulation 2016/679 and/or as natural persons acting under the authority of the Data Controller or Processor pursuant to Article 29 of EU Regulation 2016/679, or who operate independently as separate Data Controllers, for the purposes listed above.

TRANSFER OF DATA TO A THIRD COUNTRY
Personal data will not be transferred outside the European Union.

RIGHTS OF DATA SUBJECTS
You may exercise the rights provided for under Articles 15 et seq. of EU Regulation 2016/679 by contacting the Data Controller. You have the right, at any time, to request access to your personal data and the rectification or erasure thereof. You also have the right to data portability. You have the right to withdraw your consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal. Without prejudice to any other administrative or judicial remedy, if you consider that the processing of personal data relating to you infringes EU Regulation 2016/679, you have the right to lodge a complaint with the **Italian Data Protection Authority (Garante per la protezione dei dati personali)**.

AMENDMENTS TO THIS PRIVACY NOTICE
The Data Controller reserves the right, at its discretion, to change, modify, add or remove any part of this Privacy Notice at any time. In order to make it easier to verify any changes, this Privacy Notice will indicate the date on which it was last updated.

Last updated: 25/09/2026

The Data Controller
FACOM SRL A SOCIO UNICO