



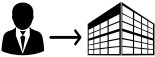



**D-Orbit SpA**  
 Viale Risorgimento, 57 - 22073 To Mornasco (CO)  
 VAT No. 07373150965

107- WEBSITE PRIVACY POLICY  
 Ver. 9.0 of 20-03-2019  
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**WEBSITE PRIVACY POLICY**

Dear User, **D-Orbit SpA** has great respect for privacy of the Users of its websites. The data that may be communicated by users through the website will be treated with utmost care and with all the tools necessary to ensure their security, in full compliance with the regulations in force to protect the confidentiality of data. We wish to inform you that the "*European Regulation 2016/679 on the protection of individuals with regard to the Processing of Personal Data and on the free movement of such data*" (hereinafter "GDPR") provides for the protection of individuals with regard to processing of personal data as a fundamental right. In accordance with Article 13 of the GDPR, therefore, we inform you that:

	<p><b>A. CATEGORIES OF DATA:</b> the object of the processing may be data subject's personal data such as:</p> <p><b>a. Data collected automatically:</b> computer systems and applications dedicated to the functioning of this website collect, during their normal operation, some data (transmission of which is implicit to the use of Internet communication protocols) potentially associated with identifiable users. Among the data collected are IP addresses and domain names of the computers used by users connecting to the website, URI (Uniform Resource Identifier) addresses of the resources requested, the method used to submit 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 regarding the operating system, browser and computer environment used by the user, name of the internet service provider (ISP), date and time of visit, web page of origin (referral) and exit.</p> <p><b>b. Data provided voluntarily by the user:</b> The voluntary and explicit sending of electronic mail to the addresses indicated in the different access channels of this website does not imply a request for consent and involves the acquisition of the sender's address and data, necessary to respond to requests, as well as any other personal data included in the message. Such data are understood to be voluntarily provided by the user at the time of requesting the service. By entering a comment or other information the user expressly accepts this privacy policy and agrees that the contents entered may be freely distributed to third parties. On the contrary, specific summary information will be reported or displayed on the pages of the website prepared for services on request (forms). The user must therefore explicitly consent to the use of the data contained in such forms in order to send the request.</p> <p><b>c. Cookies.</b> The website uses cookies. The data collected through cookies may be used to access parts of the website or for statistical purposes or to make user's browsing experience more enjoyable and more efficient in the future, trying to assess user behavior and to modify the offer of content accordingly. A <a href="#">cookie policy</a> is available for further information.</p> <p><b>d. Plug-in.</b> The website also incorporates plugins and/or buttons for social networks, in order to allow easy sharing of content on social networks. These plug-ins are programmed so as not to set any cookies when accessing the page, in order to safeguard user privacy. Cookies are only set, if so provided by social networks, when the user makes effective and voluntary use of the plug-in. Please note that if the user is logged into a social network, then he or she has already consented to the use of cookies transmitted through this website when logging in to such social network. The collection and use of data obtained through the plug-in is governed by the respective social network privacy policies, to which the user should refer.</p>
	<p><b>B. DATA CONTROLLER:</b> the data controller is <b>D-Orbit SpA, Viale Risorgimento, 57 - 22073 Fino Mornasco (CO)</b>, VAT number <b>07373150965</b>, which can be contacted by telephone on <b>02.37920900</b> or by e-mail at <a href="mailto:privacy@dorbit.space">privacy@dorbit.space</a>.</p>
	<p><b>C. SOURCE OF PERSONAL DATA:</b> personal data held by the data controller are collected directly from the User.</p>
	<p><b>D. PURPOSES OF DATA PROCESSING AND LEGAL BASIS:</b> the processing of personal data has a specific legal basis and purpose:</p> <ol style="list-style-type: none"> <li>1. <a href="#">For data collected automatically</a>, the legal basis is the legitimate interest of the Data Controller and the purpose is to ensure and improve the website browsing experience by virtue of obtaining statistical information on the use of the website, checking its regular operations, and for security purposes</li> <li>2. <a href="#">For data provided voluntarily by the user</a>, the legal basis is consent and the purpose is: (i) for sending e-mails to Data Controller's addresses - allow response to specific requests made by the user; (ii) for forms – as indicated in each specific form.</li> <li>3. <a href="#">For cookies and plug-ins:</a> the <a href="#">cookie policy</a> applies.</li> </ol>

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	<b>E. DATA RECIPIENTS:</b> within the limits relevant to the processing purposes indicated, personal data may be communicated to Data Controller's partners, consulting companies, private companies, third party technical service providers, hosting providers, IT companies, communication agencies or other persons.
	<b>F. TRANSFER OF DATA TO THIRD COUNTRIES:</b> This site may share some of the data collected with services located outside the European Union. Through social plug-ins and the Google Analytics service. The transfer is authorized and strictly regulated by Article 45, paragraph 1 of EU Regulation 2016/679 and does not require specific authorization.
	<b>G. CONSERVATION PERIOD:</b> collected data will be stored no longer than is necessary for the purposes for which the personal data are processed (" <i>principle of storage limitation</i> ", art.5.1(e), GDPR) or according to the deadlines required by law. Obsolescence of the stored data in relation to the purposes for which they were collected is periodically verified.
	<b>H. RIGHTS OF THE DATA SUBJECT:</b> the data subject always has the right to request the Data Controller to provide access to her data, to rectify or cancel them, to limit processing or not to process the data, to request data portability, to revoke the consent to processing by asserting these and other rights provided by GDPR by simple communication to the Data Controller. The data subject may also lodge a complaint with a supervisory authority.
	<b>I. OBLIGATION TO COMMUNICATE DATA:</b> communication of personal data for purposes related to points D.1 and D.2 is mandatory during the navigation of the website in order to allow the correct provision of the service. Communication of personal data for the purposes related to point D.3 is instead optional and will not compromise in any way the provision of the service.
	<b>J. DATA PROCESSING METHODS:</b> the personal data will be processed in compliance with the above-mentioned regulations and the confidentiality obligations that apply to the activity of the Data Controller. The data may be processed with IT tools, on paper and using any other type of suitable tools (e.g. cloud systems, storage and digital replacement storage systems), in compliance with appropriate technical and organizational security measures as stipulated by GDPR.
	<b>K. FINAL NOTES AND UPDATE MODES:</b> personal data are provided only for this website and not for other websites that may be consulted by the user through links contained on this website. This policy may be subject to changes due to the introduction of new applicable regulations, Data Controller therefore invites users to periodically check this page to consult the latest version of the policy. The previous versions of this information may always be requested from the Data Controller.
	<b>M. AUTOMATED DECISIONAL PROCESSES:</b> No automated decision-making processes are foreseen.