

PRIVACY POLICY

INFORMATION ON THE PROCESSING OF PERSONAL DATA pursuant to art. 13 of EU Regulation 2016/679, General Data Protection Regulation ("GDPR")

This information is provided for the www.sutter.it site and, unless otherwise specified, in relation to other websites corresponding to subdomains dedicated to specific initiatives, as well as to the smartphone application. Any changes and / or additions to this list will be communicated and brought to the attention of the user on the occasion of an update of this Privacy Policy.

The www.sutter.it site, the other sites indicated above and the mobile application will be hereinafter individually referred to as the "**Site**".

Please note that third party sites that may be referred to through special links on this Site are governed by a privacy policy separate from this one and that goes beyond it.

This privacy policy is for all those who interact with the web pages of the Site, both to those who use the Site without making any registration, and to those who, at the end of a specific procedure, register on the Site and use the online services provided through it.

This information is provided pursuant to art. 13 GDPR and is inspired by the provisions of the Recommendations adopted by the European Authorities for the Protection of Personal Data, gathered in the Group established by art. 29 of Directive no. 95/46 / EC in order to identify the minimum requirements for the collection of personal data online and through apps, and their subsequent amendments and additions.

DATA CONTROLLER	Sutter Industries S.p.A. Location Leigozze, 1 Borghetto di Borbera (Alessandria) P. IVA 02102690068 (" Sutter ", " Company " or " Data Controller ")
PERSONAL DATA OBJECT OF TREATMENT	<p>In addition to anything else provided on other pages (in particular with reference to "Cookies"), the following data may be collected and processed through the Site and the use of its features and / or adherence to the services provided therein:</p> <ul style="list-style-type: none">- navigation data: these are the data that the server automatically records each time you visit the site, such as IP addresses or domain names of the computers used by users connecting to the Site, the addresses in URI (<i>Uniform Resource Identifier</i>) notation of the requested resources, the time of the request, 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 relating to the operating system and the user's computer environment;- common and identifying personal data: this category includes name and surname, address, e-mail, company to which you belong and any additional contact details provided by filling in the electronic <i>forms</i>, from time to time, published on the Site. <p>In addition to the foregoing, Sutter offers the opportunity to apply online for job positions, from time to time, published on the Site, through the pages "Work with us" and "Sutter is Careers". Through the electronic form published on this page, the name and surname, date of</p>

	<p>birth, address, email, telephone number, educational qualification, as well as additional information provided through the curriculum vitae that will be uploaded will be collected. Interested parties are invited not to include in their curriculum vitae special categories of personal data (and, in particular, data relating to health).</p>
<p>LEGAL BASIS E PURPOSE OF THE TREATMENT</p>	<p>The processing of personal data is based on the existence of a contractual or legal obligation or, depending on the case and as better specified in the following paragraph, on the existence of a legitimate interest of the Company or on the user's consent, optional and revocable at any time, and is aimed exclusively at achieving the following purposes:</p> <ul style="list-style-type: none"> (i) in fulfillment of contractual obligations - to ensure registration on the Site and the correct provision of the services requested through the Site and / or through forms made available therein, to allow a better use of the services and a better browsing environment, as well as, with specific reference to the data entered in the pages "Work with us" and "Sutter is Careers", to consider and evaluate the application and to contact the candidate to arrange an interview, thus following up on your specific request; (ii) in fulfillment of legal obligations - for the fulfillment of obligations deriving from the law or regulations, national and / or community, in force, including in the tax field, as well as from provisions issued by competent authorities and bodies; (iii) by virtue of a legitimate interest of Sutter - for the defense in court of a right or interest before any competent authority or body (including in the field of computer crimes); for carrying out statistical analysis and market surveys on aggregated data; for sending, by email, information communications regarding similar products or services (so-called soft spamming) to those subject to a previous commercial or contractual contact and unless opposed of the user to such processing. <p>It is understood that in no case the data acquired through the pages "Work with us" and "Sutter is Careers" will be processed for soft-spamming purposes.</p>
<p>MANDATORY OR OPTIONAL NATURE OF DATA PROVISION</p>	<p>The provision of data for the purposes referred to in points (i) (fulfillment of contractual obligations), (ii) (fulfillment of legal obligations) and (iii) (legitimate interest of Sutter) indicated above is purely optional. However, since this processing is necessary to allow registration on the Site and the provision of services offered through it, including those deriving from and / or connected to the submission of an application for open positions referred to in the pages "Work with us" and "Sutter is Careers", the failure, partial or incorrect provision of the data in question will make it impossible, depending on the case, to register on the Site and / or to use the services provided online and, in general, to carry out the contractual relationship by establishing or establishing and / or fulfilling the obligations as required by the contract or by applicable law or, again, to process specific user requests.</p>
<p>DATA COMMUNICATION</p>	<p>The data may be communicated to the following categories of subjects ("recipients"):</p>

	<ul style="list-style-type: none"> - to all those subjects (including Public Authorities) who have access to personal data by virtue of regulatory or administrative provisions; - to all those subjects, public and / or private, natural and / or legal persons to whom the communication is necessary or functional to the correct fulfillment of a contractual or legal obligation. <p>In addition to the foregoing, for the pursuit of the purposes described above, personal data may be made known to subjects operating on behalf of the Company, such as, by way of example but not limited to,</p> <ul style="list-style-type: none"> - companies, consultants or professionals who may be in charge of the installation, maintenance, updating and, in general, management of the hardware and software of the Site; - to companies or professionals in charge of sending documentation and / or informative material, - to professionals and legal and tax advisors of the Company, - to other companies of the Sutter Group based in Italy or within the European Union. <p>who will process them as external data processors on behalf of Sutter. An updated list of names of the persons appointed as data processors is available at the Company's registered office.</p> <p>In any case, personal data will not be transferred to non-EU countries or outside the European Economic Area.</p>
<p>STORAGE TIMES OF PERSONAL DATA</p>	<p>Personal data will be kept for the entire duration of the contractual relationship (and, as for the data acquired through the "Work with us" page, for the time necessary to evaluate the application and for the entire selection phase and procedure) and, subsequently, for the maximum time provided for by the applicable legal provisions on prescription the rights and/or forfeiture of the action (also in the administrative-fiscal field) and, in general, for the exercise/defense of Sutter's rights in disputes brought by public authorities, public subjects / bodies and private subjects.</p>
<p>CHILDREN UNDER 16</p>	<p>The Site does not contain information or features or services directly intended for users under the age of 16.</p> <p>Minors must not provide information or personal data without the consent of the holders of parental responsibility over them.</p> <p>Therefore, all users who have not reached the age of 16 are invited not to communicate their personal data under any circumstances without the prior authorization of a parent or the operator of parental responsibility. If the Company becomes aware of the fact that personal data have been provided by a minor (under the age of 16), the Company will immediately destroy them or request the transmission of specific consent from the parents (or the operator of parental responsibility), also reserving the right to inhibit access to the services available on the Site to any user who has concealed his minor age or who has in any case communicated their personal data without the consent of their parents (or of the operator of parental responsibility).</p>
<p>RIGHTS</p>	<p>As an interested party, the user has the right to ask the Data Controller to exercise the following rights:</p> <p><i>Right of access</i> You may request to obtain confirmation as to</p>

		<p>whether or not your personal data are being processed and, if so, to access such data and specific information on the processing, such as, by way of example, the purposes, the categories of data being processed, the existence of the other rights indicated below. You can also request a copy of your data.</p> <p><i>Right to rectification</i> You have the right to request and obtain rectification of personal data concerning you and / or the integration of incomplete personal data.</p> <p><i>Right to erasure</i> You may obtain the cancellation of your data, without undue delay, among other things, if (i) such data are no longer necessary for the purposes for which they were collected, (ii) you oppose the processing of your data (as indicated below) and there is no other legitimate overriding reason for the processing, (iii) the data are processed unlawfully, (iv) the data must be erased by virtue of a legal obligation, (v) personal data of a child under 16 years of age have been collected in connection with the provision of information society services. Please note that this right does not apply if the processing of data is necessary, inter alia: 1. for the fulfillment of a legal obligation; 2. for the establishment, exercise or defence of a right in court.</p> <p><i>Right to restriction</i> You have the right to obtain the limitation of processing in case of: - contesting the accuracy of personal data concerning you within the time necessary for the Company to verify the accuracy of these data; - unlawful processing and your request for the restriction of use in lieu of its deletion; - your need for data for the assessment, exercise or defense of a right in court; - opposition on your part to the processing, as indicated below, pending verification of the prevalence of legitimate reasons by the owner.</p> <p><i>Right to portability</i> In case of automated processing, you have the right to receive personal data concerning you in a structured, commonly used and machine-readable format and to transmit them to another data controller. You also have the right to obtain the direct transmission of data from one holder to another, where technically feasible. The possibility of obtaining the deletion of data,</p>
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	<p><i>Right of opposition</i></p>	<p>as indicated above, remains unaffected.</p> <p>You have the right to object at any time to the processing based on a legitimate interest of the data Controller, unless the latter demonstrates compelling legitimate reasons to proceed with the processing that prevail over the interests, rights and fundamental freedoms of the interested party or for the assessment, exercise or defense of a right in court.</p>
	<p>Finally, you have the right to lodge a complaint with the Supervisory Authority (http://www.garanteprivacy.it/).</p> <p>The above rights may be exercised with a request addressed without formalities to the Data Controller. The request can be sent to the Data Controller by letter or e-mail to the following addresses: Località Leigozze, 1, Borghetto di Borbera (Alessandria) - email: privacy@sutter.it.</p>	
<p>This Privacy Policy was last updated in May 2023.</p> <p>This Privacy Policy may be further subject to updates. The Data Controller therefore invites users to periodically visit this page in order to become aware of any changes or updates.</p>		