

Privacy Policy
Updated to European Regulation for personal data protection n.679/2016, GDPR and D. Law n.101/2018

In compliance with the provisions of the community regulation (European Regulation on data protection no.679/2016, GDPR) and to the D. Law no. 101/2018, this website www.liburnasds.it respects and protects the confidentiality of the users, by adopting appropriate measures in order not to damage their rights.

This document takes also account of the Recommendation n.2/2001 that the European Authorities for data protection adopted in order to identify the minimum requirements for the data collection online.

This Privacy Policy applies solely to the online activities of this website and it is in force for its users.

The purpose of this Privacy Policy is to provide full transparency with respect to the information that the platform collects and how it uses them.

CATEGORIES OF PROCESSED DATA

1. **The registered Customer/User's personal data (anagraphic, tax data, business data)** that we receive and that are uploaded by them on the platform, namely the basic information to create an account and a User profile, are used to manage orders, provide services, make payments, communicate with the registered users for what concerns services and promotions, update our registers and, generally, to manage the User's account.

2. **Access and use information.** Liburnasds collects information related to User's activity with respect to the provided service as well as those on the use, on the diagnostic and the performance. This also include the information about the User's activity (and the related use method, the interaction mode through our Service, the timetable, the frequency and duration of the interactions and the activities), recording file and report related to the diagnostic, crash. The ones related to the moment of the user's registration in order to use our services and the functions that are used such as those related to the messaging or to the latest access are furthermore included.

3. **User's willingly provided data.**

The explicit and intentional optional transmission of e-mails to the address indicated on this site implies the sudden collection of the sender's email address, required to reply to the requests, as well as the other potential personal data in the mail. Specific concise information, in case of needed consent to data processing, will be gradually reported or viewed in the Site Page prepared for special services on request. ("demo test", user subscription etc.).

3.1. Since Liburna sds is a communication system that delivers security sheets to third Parties and that ensures a correct management of the risks in the workplace, by simplifying the entire logistic cycle of the SDS in a fast and authomatic way all long the supply chain and by offering the provider the legal evidences needed to confirm the compliance with the obligations and regulations, **It also process those data for which the registered User provided consent in order to import them in the platform (product's documents in digital form in the corporate ERP, SDS, data sheets, certificates etc).**

3.2 Since on behalf of the registered Users/Customers, Liburnasds sends the aforementioned documents, required by law, to third Parties that shall receive

them, the Holder of the Process also treats **those data (anagraphics, mails) of such third Parties** with the aim of sending email with direct link or QR Code, digital code that can be reported at the moment of the invoice, Delivery Documents, label, product's packaging etc.

4. **Instant messaging.** Liburnasds Provides an instant messaging service between registered Users and their Suppliers (Users' Suppliers) and vice-versa. User's messages will be filed in his device. If delivering a message wouldn't be immediately possible (e. g. the User is offline), this will be filed in our archive for 30 days from the first attempt. If after 30 days the deliverer wouldn't still be possible, it will be deleted. The messages are protected by end.to.end cryptography, namely that all the messages will be readable only to those users involved in the exchange, and hidden from third parties.

5. **Browsing Data**

Computer systems and software procedures for the website functioning acquire, during their normal course and connection, some data whose disclosure is a subject of Internet communication protocol.

Those information aren't collected to be associated to identified entities, but by their very nature might, through elaborations and associations with data held by third parties, identify the users. The following information are part of this data category:

- internet protocol (IP) address associated to a device used in order to connect;
- browser typology and parameters of the device used in order to connect to the website;
- internet service provider's (ISP) name;
- date and hour of the visit;
- user's web page of origin (referral) and output page;
- possible number of clicks effectuated on the website and possible expressed liking;
- other parameters related to the operating system and the informatic environment of the user.

This data can be used with the aim of obtaining anonymous statistical information on the use and to check the correct functioning as well as:

- to be in compliance with the provisions national and Community regulations;
- to follow our responsibilities in case of possible cyber crimes to the site, and for checks in case of disputes.

Only the collected data (through the website as well as the App) for supervision purposes will remain on the server for a 12-month-period.

6. **Data deriving from the APP installation on the device.** Personal data processing deriving from the installation and the use of the App "LIBURNASDS" (hereinafter referred to as "App") it's effectuated in order permit the fruition of the services of such App in compliance with Liburnasds.it platform. Some of the data collected by the App (e. g. data related to geolocalisation) can be used for profiling purposes too, and for the products and services' offer on the expressed consents basis. Following the download and the installation of the App, the device model, as well as the type and the version of its operating system. Such information help us providing the required performances and managing the App, analyzing its use, protecting it and its content from an unlawful use and improving user's experience. Personal data are processed to make the app available, maintain and improve it, communicate with the users. The download of the App is furthermore used as a data with the sole aim of obtaining anonymous statistical information about the

number of users that download it. For what concerns the data saved by the App, in the device's keystore on the used operating system basis, please note what follows:

- Android: data are saved in the shared preferences until the customer deletes the data through "Delete Data" in the "Applications Manager" section or he deletes the App;
- iOS: Data are saved in the keystore
- Windows Phone: data are saved in the keystore until the customer delete the App

The website's Holder is not involved in such processing, for further information related to the storage and deletion of the data on the device, please contact the related operating systems' developpers.

7. **Geolocalisation Data.** With the APP, Liburnasds collects the information related to the location for diagnostic and resolution purposes, for example if the user has problems with the app location's functions.

8. Liburna sds is entitled to collect, process, file and share the information of the user, if in good faith and reasonably needed in order to: a. respond, pursuant to aplicable law and Regulations, to legal proceeds or gouvernemental requests, b. follow our applicable terms and other conditions and information even for possible breach examinations; c. identify, analize, prevent and manage frauds and other illegal activities or security/technical issues; d. protect the rights, the property and the security of both Flashpoint S.r.l. and the Users.

9. In any case Liburna sds is entitled to collect and process datas that allow to know the location of the products for which the User sent the technical sheets, certificates etc.

PROCESSING LEGAL BASIS

1. Collected data based on the Contract

Legal Basis for data processing of the company Flashpoint srl, Holder of the platform www.liburnasds.it for the Customers/Users that subscribed to the platform LIBURNA SDS and that underwrote the contract terms and the use of the platform itself.

2. Data processed on the legitimate interest basis and pursuant to law

The legal basis for the data prcessing by Flashpoint srl for third parties' anagraphic data, such as recipients of the files and documents submitted through the platform "LIBURNA SDS" by the users.

"LIBURNA SDS" Smart Delievery System software, process such data with the aim of facilitating and accelerating in an authorised and legal way, the submission of technical and security sheets of registered products and the the Reading Certification with accurate reported date of the same sheets and/or documents required by law to third parties identified in the business relationship between the parties pursuant to law.

Data processed by the platform and by the managing software are directly entered by the subscribers based on the contract underwritten with Flaspoin srl by which it is provided a sds submission service.

Such shipping method provided by the platform Liburna sds implies a direct benefit in favour to the Third Party (User or non-registered entity) that will expect, and therefore will be interested in, receiving the documents required by law based on the business relationship between the parties.

3. Data processed based on the consent

Legal basis for the processing of all data with marketing/newsletter, profilation, geolocalisation purposes.

The use of this website is subject to the written approval of the Contract Terms, of this Privacy Policy and the Privacy Information provided, users agree to their data processing with respect to themethods and aims hereby described, including potential disclosure to third parties if needed in order to provide service.

By giving personal data, and therefore the Consent to collect and process them, its optional and at the sole discretion of the Customer/Subscriber.

The User is entitled to negate the consent for marketing and profiling purposes and may withdraw at any time the already provided consent by sending an email to info@flashpointsrl.com and this shall not modify the settings or the provided services for its account.

Refusing to provide the consent for the geolocalisation may impossibility to correctly supply in part or in its entirety the subject of the contract signed by the two parties and, therefore, the services provided through the platform and the App might be compromised or limited.

The termination or non-renewal of the contract with Flashpoint srl will imply the impossibility to access the platform and the app.

PURPOSES OF THE PROCESSING

Dangerous chemical products' placing on the EU market, force the companies to manage the information accurately and responsibly. Liburna SDS is the communication system that delievers security data and sheets to the customers and ensure a correct management of the risks on the workplace.

Data will generally be processed with electronic devices and may be used to/for:

- a) Enter the anagraphic in companies' digital databases;
- b) Submit documents from companies' ERP;
- c) Provide the required services and manage the relationshis with the customers;
- d) Submit offers and estimates to active and/or potential suppliers;
- e) Submit requests for offers and estimates to active and/or potential suppliers;
- f) For ordinary accounting, VAT and tax obligations;
- g) Receipts and payments management;
- h) The submission of the newsletter, information about your own business or updatings related to it, promotional material, invites to informative or promotional events, submission of promotional material by telephone, mail, shipper, fax or e-mail;
- i) Geolocalisation of products subject to the legal obligation of security technical sheets' submission, certificates etc.
- j) Market and statistical analysis related to the services;
- k) Selling and/or placement direct activities;
- l) Fulfil the obligations pursuant to law, Regulations, Community Regulation, civil and tax provisions;
- m) Act in compliance with Community and National Regulations;
- n) Security purposes to neutralize attempts to damage the website or its subscribers, or any other unlawful or damaging activity.

Secondary aims for personal data processing

Personal data collected for the aforementioned purposes may be also used for customer satisfaction activities: for such purposes you'll be required to give the consent, you are entitled to accept or refuse.

By providing the consent for Marketing Purposes, the applicant is aware of such purposes in a broad sense (including but not limitately to subsequent managing activities) and expressively authorizes them, once the consent to those measures has been given, pursuant to EU Regulation.

Please note that specifically and separately, pursuant to art. 21 of EU Regulation, if personal data are processed for direct marketing purposes, the applicant is entitled to object at any, and if the applicant objects to such direct marketing data processing, such data shall not be processed for these purposes.

SERVICES PROVIDED BY THIRD PARTIES

Flashpoint srl uses third parties and third societies in order to carry out some tasks on behalf of us.

Besides the Holder, in some cases, the access to data can be allowed to some appointed entities involved in the organization of the website (Administration, Business, Marketing, Legal, System Management Staff) that is to say third entities (such as third technical services providers, shippers, hosting provider, IT companies, communication agencies).

These suppliers can only access the personal data needed to carry out their tasks.

We ensure that the latter cannot use the same data for other purposes, furthermore they must process the personal data in compliance with this Privacy Policy and pursuant to the applicable Regulations related to data protection.

Please note that the IT system and the software procedures responsible for the app functioning (Apple Store, Google Play or Windows Phone Store) collect, while performing their normal activities, some data related to the user, whose transfer is implied in the communication protocol use of internet, smartphones, or other devices.

The Holder of the Processing is not involved in these procedures and cannot be considered responsible for them.

The applicant is entitled, in any case, to consult the information on the Privacy available on the following websites:

Apple Store:

<https://www.apple.com/legal/internet-services/itunes/it/terms.html>

Google Play:

https://play.google.com/intl/it_it/about/play-terms.html

Windows Phone Store:

<https://privacy.microsoft.com/it-it/privacystatement>

ARUBA CLOUD FOR STORAGE

LIBURNA SDS provides the Users and the recipients with their own cloud space where they'll be able to download and/or consult the documents filed and to view the reports.

Liburna sds uses the company Aruba as Cloud Service.

The transfer is authorized on the basis of "Standard Contract Clauses" and further measures pursuant to Recommendation no.1/2020 by EDPB.

It is certified and in compliance with the logic, physical, and organizational security standards provided by ISO 27001 Certificate.

It is furthermore in possession of the following certificates: ISO 9001, ISO 14001, ANSI/TIA 942 and more. For further information please refer to the following link: <https://www.aruba.it/gdpr-regolamento-europeo-privacy.aspx>

SECURITY MEASURES AND PROCESSING METHODS

Personal data are processed with automated instruments for the time strictly necessary to fulfill the aims for which they're collected.

For what concerns the processing term, you can see the Data Retention Policy in the corporate documentation. In case of Account termination, the data will be anonymized but filed for a 10-year period of time pursuant to law for the contract relationships and possible disputes' purposes.

Specific security measures are fulfilled to prevent data's loss, illegal or illegitimate uses and unauthorized access, as well as encryption and pseudonymization techniques and specific modes of selected data access.

DISCLOSURE

Personal data collected won't be disclosed, sold, exchanged or communicated to third parties other than the Holder, without prior applicant's consent. The disclosure to third parties different from the Holder, from external and designed corporated managers, appointed pursuant to art. 13 c.1 letter e) of EU Regulation is provided for the fulfilment of the purposes related to the paragraph LEGAL BASIS OF THE PROCESSING of this Policy and in any case pursuant to the latter, to: third parties or external companies that provide technical and informatic assistance (societies that create apps or that realise the company management system etc.), companies affiliated to third parties that provides elaboration of informations services to Flashpoint srl or complementary activities compared to the ones carried out by the company, in order to permit the correct performance of the contract, all involved in the correct and regular fulfilment of the aims previously described.

In any case the processing by third parties shall be effectuated pursuant to the law in force.

For this reason, Flashpoint srl is entitled to disclose Subscribers/Customers personal data to other companies or third parties in the following cases:

1. Whenever the applicant has given his consent;
2. Whenever the communication is required in order to fulfil the requests of the Customer/User or to provide a service;
3. Whenever the communication is required relating to companies that work on behalf of Flashpoint srl with the aim of providing the product or service requested by the User/Customer (Flashpoint S.r.l. will disclose only the information needed in relation to the service's fulfilment) or in order to inform the User/Customer about the latest products or services, the special offers or other information of which Flashpoint believes that the Registered Customer/Subscriber could be interested in being awared about by Flashpoint Srl itself as well as by Flashpoint srl's partner companies (at any time, the Registered Customer/Subscriber is entitled to request not to receive such information anymore).

PROCESSING PLACE

The data collected are processed by the Holder of the treatment pursuant to the law in force, company FLASHPOINT S.r.l., with registered office in Casina – Pisa, vian Norvegia n.56 and in the other office of Sesto San Giovanni (MI) Piazza Privata Francesco Caltagirone n.75, all of them located in the EEA and acting in compliance with European Regulations.

DATA TRANSFER TO NON-EU COUNTRIES

This website doesn't transfer the data collected outside the EU.

All of our servers and Processors are located inside the EU, exceptions are the data collected by Google, through its Google Analytics and Google Maps service.

The transfer is authorized by the "Standard Contract Clauses" and other measures as provided by Recommendation n.1/2020 BY edpb.

COOKIE

This website uses Cookie, small text files that allow to preserve the information on users' preferences, in order to improve the website's features, to simplify the browsing by automating the procedures (e. g. login, language of the website etc.) and to analyse the use of the website.

Especially, **session cookie** are essential to differentiate the online users, as well as useful to avoid that a required feature is provided to the wrong user, and for security reason, that is to say blocking cyber-crime on the website. Session cookie do not contain personal data and last for the sole current session, that is to say until you close the browser. Session Cookie do not require your consent.

Functionality Cookie are necessary for the features of the website and are strictly linked to a specific request by the User (e. g. Login), for them too it is not required your consent.

By using this platform, the user expressively provides the consent on cookie use.

COOKIE DISABLEMENT

Cookie are connected to the browser and can be disabled directly through it, by simply refusing or withdrawing your consent.

Users should consider that cookie disablement may affect the correct use of the website; therefore, it won't be possible to access some features, pages or sections of the same and, in this case, FLASHPOINT declines any responsibility.

The directions for cookie disablement are better described in the "guide" menu of the browser you're using, from which you can edit your preferences to cookie by following the related links that can be found in the web pages of: Internet Explorer; Safari; Chrome; Firefox.

THIRD PARTIES' COOKIE

This website acts as **intermediary for third parties' cookie**, used in order to provide further services and features to the users and in order to improve the use of the same website, as specific buttons that refer to Social Medias, or video. This website does not control third parties' cookie in any way, the latter are controlled by the same third parties. Therefore, the information on the use of this kind of

cookie and on their aims, as well as the methods for a potential disablement, are directly provided by the third parties hereinafter defined:

- **Google Analytics:** a tool by Google that, by using performance cookie, collects and analyses anonymous cookie (IPs severed before the last octet) exclusively gathered with the aim of examining the website's use by users, filling reports on their activities and providing information such as the number of users that visited the pages and so on. Google is also entitled to disclose this information to third parties when provided by law, or if the third parties are processing this data on behalf of Google. No data previously in possession of google will be associated with the IP address collected. Data transferred to Google are filed in their servers located in the United States.

Based on a specific agreement with Google, who's appointed as Controller, the latter shall process the data based on the requests of the Holder (see at the bottom of this information sheet), submitted through the software settings. With regard to this information, the advertising and sharing options of data are disabled.

For further information, check the page: [Google Analytics Cookie Usage on Websites](#).

The User may selectively disable the data collection by Google Analytics by installing this plug-in on its browser:

<http://tools.google.com/dlpage/gaoptout?hl=en>.

test_cookie.doubleclick.net is not a persistent cookie, but it is used to verify if the user's browser supports cookie.

For further information on the processing of data by Google, please check the Per ulteriori informazioni sull'uso dei dati e sul loro trattamento da parte di Google si raccomanda di prendere visione delle informazioni all'apposita appropriate [Google](#) page, and the page that explains the [Methods of data processing by Google when a User access partners' websites or Apps](#).

- Profilation cookie that allow to see where users carry out actions on the page of a website: <https://www.hotjar.com/legal/policies/cookie-information>

USER'S RIGHTS

Pursuant to the European Regulation 679/2016 (GDPR) and in compliance with the provisions of the Privacy Decree n.101/18, Users are entitled to:

- request confirmation of the personal data related to him (right to access);
- receive information related to the logic, the methods and the aims of the processing;
- request updates, rectification, integration, cancelation, transformation in an anonymous form, the block of the data processed by breaching the law including those no more needed for the fulfilment of the aims for which they've been collected;
- in cases of processing based on the consent, receiving by only paying for the support service, the data provided to the Holder of the Processing, and held by the latter, in a correctly structured form that can be read by, and generally used for, an electronic device;
- the right to present a claim to the Data Protection Authority or to the Judicial Authority;
- Pursuant to art. 2 – terdecies of the Privacy Decree n.101/2018, all the rights (from art.15 to art.22 of EU Regulation) referring to personal data related to dead people, can be exercised by who has reasonable interests or who's acting in order to protect the applicant, as a mandatory, or for family reasons that deserve protection.

-as well as, more generally, exercised all the rights for which he/she is entitled from applicable law.

The requests shall be submitted to the Holder of the processing.

In the case that the data processed are based on **legitimate interests**, the rights of the applicants shall however be ensured (exception is the right of portability that is not required by the regulation), especially the right of objection to processing, that can be exercised by sending a request to the Holder of the Processing. It is possible to object the processing of personal data

a) For legitimate reasons;

b) (without obligation to explain the reasons) when data are processed for marketing or business purposes.

NOTWITHSTANDING THE LIMITATIONS TO THE RIGHTS OF THE APPLICANTS RELATED TO ART. 2 – undecies and 2 – duodecies of the D. Law n.101/2018

APPEAL

Whenever the User believe the aforementioned rights related to personal data protection to be breached, the applicant may present a claim to the Data Protection Authority pursuant to art. 77 of the Regulation and art. 141 of the Privacy Decree or appeal to the Judicial Authority pursuant to art. 78 and 79 of EU Regulation and pursuant to art. 152 et seq. Privacy Decree.

HOLDER OF THE DATA POCESSING

The holder of the data processing is the company Flashpoint s.r.l. with registered office in Via Norvegia no.56, Cascina (PI), that can be contacted through the section CONTACTS on the website flashpointsrl.com.

RESPONSIBLE FOR POCESSING

In order to know the external appointed Responsibles, the Holder of the Processing refers to the corporate Privacy Policy. For any other communication it is possible to contact the Holder at the following mail address: info@flashpointsrl.com.