

# Privacy Policy of [www.etelec.com](http://www.etelec.com)

This Website collects some Personal Data from its Users.

## Owner and Data Controller

Etelec Italia S.P.A. - Via Domenico de Roberto, 44, 80147 Napoli NA

**Owner contact email:** [etelec@etelec.it](mailto:etelec@etelec.it)

## Types of Data collected

Among the types of Personal Data that this Website collects, by itself or through third parties, there are: email address; first name; Usage Data; Cookies; various types of Data; session duration; scroll-to-page interactions; clicks; country; time zone; device information; interaction events; diagnostic events; page events; custom events; layout details; positional information; city; session statistics; browser information; last name; company name; ZIP/Postal code.

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection.

Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using this Website.

Unless specified otherwise, all Data requested by this Website is mandatory and failure to provide this Data may make it impossible for this Website to provide its services. In cases where this Website specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service.

Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner.

Any use of Cookies - or of other tracking tools - by this Website or by the owners of third-party services used by this Website serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document and in the Cookie Policy.

Users are responsible for any third-party Personal Data obtained, published or shared through this Website.

## Mode and place of processing the Data

### Methods of processing

The Owner takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data.

The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of this Website (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

### Place

The Data is processed at the Owner's operating offices and in any other places where the parties involved in the processing are located.

Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

### Retention time

Unless specified otherwise in this document, Personal Data shall be processed and stored for as long as required by the purpose they have been collected for and may be retained for longer due to applicable legal obligation or based on the Users' consent.

## The purposes of processing

The Data concerning the User is collected to allow the Owner to provide its Service, comply with its legal

obligations, respond to enforcement requests, protect its rights and interests (or those of its Users or third parties), detect any malicious or fraudulent activity, as well as the following: Contacting the User, Interaction with external social networks and platforms, Analytics, Displaying content from external platforms, Data transfer outside the EU, SPAM protection, Managing contacts and sending messages, Tag Management, Content performance and features testing (A/B testing), Registration and authentication, Heat mapping and session recording and Registration and authentication provided directly by this Website.

For specific information about the Personal Data used for each purpose, the User may refer to the section "Detailed information on the processing of Personal Data".

## **Detailed information on the processing of Personal Data**

Personal Data is collected for the following purposes and using the following services:

### **Analytics**

The services contained in this section enable the Owner to monitor and analyze web traffic and can be used to keep track of User behavior.

#### **Google Analytics**

Google Analytics is a web analysis service provided by Google Inc. ("Google"). Google utilizes the Data collected to track and examine the use of this Website, to prepare reports on its activities and share them with other Google services.

Google may use the Data collected to contextualize and personalize the ads of its own advertising network.

Personal Data processed: Cookies; Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt Out](#); Ireland – [Privacy Policy](#).

#### **Google Analytics with anonymized IP (Google Ireland Limited)**

Google Analytics is a web analysis service provided by Google Ireland Limited ("Google"). Google utilizes the Data collected to track and examine the use of this Website, to prepare reports on its activities and share them with other Google services.

Google may use the Data collected to contextualize and personalize the ads of its own advertising network. This integration of Google Analytics anonymizes your IP address. It works by shortening Users' IP addresses within member states of the European Union or in other contracting states to the Agreement on the European Economic Area. Only in exceptional cases will the complete IP address be sent to a Google server and shortened within the US.

Personal Data processed: Cookies; Usage Data.

Place of processing: Ireland – [Privacy Policy](#).

#### **Wordpress Stats**

Wordpress Stats is an analytics service provided by Automattic Inc. or by Aut O'Mattic A8C Ireland Ltd., depending on how the Owner manages the Data processing.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – [Privacy Policy](#); Ireland – [Privacy Policy](#).

#### **Google Analytics 4**

Google Analytics 4 is a web analysis service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, ("Google"). Google utilizes the Data collected to track and examine the use of this Website, to prepare reports on its activities and share them with other Google services.

Google may use the Data collected to contextualize and personalize the ads of its own advertising network. In Google Analytics 4, IP addresses are used at collection time and then discarded before Data is logged in any data center or server. Users can learn more by consulting [Google's official documentation](#).

Personal Data processed: browser information; city; device information; session statistics; Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt Out](#); Ireland – [Privacy Policy](#) – [Opt Out](#).

## Contacting the User

### Mailing list or newsletter (this Website)

By registering on the mailing list or for the newsletter, the User's email address will be added to the contact list of those who may receive email messages containing information of commercial or promotional nature concerning this Website. Your email address might also be added to this list as a result of signing up to this Website or after making a purchase.

Personal Data processed: email address; first name.

### Contact form (this Website)

By filling in the contact form with their Data, the User authorizes this Website to use these details to reply to requests for information, quotes or any other kind of request as indicated by the form's header.

Personal Data processed: email address.

### Content performance and features testing (A/B testing)

The services contained in this section allow the Owner to track and analyze the User response concerning web traffic or behavior regarding changes to the structure, text or any other component of this Website.

#### Google Optimize

Google Optimize is an A/B testing service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, ("Google").

Google may use Personal Data to contextualize and personalize the ads of its own advertising network.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – [Privacy Policy](#); Ireland – [Privacy Policy](#).

#### Google Optimize 360

Google Optimize 360 is an A/B testing service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, ("Google").

This service allows the Owner to target groups of Users on the base of their past use of this Website. Users that [opt-out](#) of tracking by Google Analytics will not be included in experiments created in Google Optimize 360.

Google may use Personal Data to contextualize and personalize the ads of its own advertising network.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – [Privacy Policy](#); Ireland – [Privacy Policy](#).

### Displaying content from external platforms

This type of service allows you to view content hosted on external platforms directly from the pages of this Website and interact with them.

This type of service might still collect web traffic data for the pages where the service is installed, even when Users do not use it.

#### YouTube video widget (Google Inc.)

YouTube is a video content visualization service provided by Google Inc. that allows this Website to incorporate content of this kind on its pages.

Personal Data processed: Cookies; Usage Data.

Place of processing: United States – [Privacy Policy](#).

#### YouTube video widget without cookies (Google Inc.)

YouTube is a video content visualization service provided by Google Inc. that allows this Website to

incorporate content of this kind on its pages.

This widget is set up in a way that ensures that YouTube won't store information and cookies about Users on this Website unless they play the video.

Personal Data processed: Usage Data.

Place of processing: United States – [Privacy Policy](#).

### **Google Fonts**

Google Fonts is a typeface visualization service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that allows this Website to incorporate content of this kind on its pages.

Personal Data processed: Usage Data; various types of Data as specified in the privacy policy of the service.

Place of processing: United States – [Privacy Policy](#); Ireland – [Privacy Policy](#).

### **Font Awesome (Fonticons, Inc. )**

Font Awesome is a typeface visualization service provided by Fonticons, Inc. that allows this Website to incorporate content of this kind on its pages.

Personal Data processed: Usage Data.

Place of processing: United States – [Privacy Policy](#).

### **Instagram widget**

Instagram is an image visualization service provided by Facebook, Inc. or by Facebook Ireland Ltd, depending on how the Owner manages the Data processing, that allows this Website to incorporate content of this kind on its pages.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – [Privacy Policy](#); Ireland – [Privacy Policy](#).

### **Heat mapping and session recording**

Heat mapping services are used to display the areas of this Website that Users interact with most frequently. This shows where the points of interest are. These services make it possible to monitor and analyze web traffic and keep track of User behavior.

Some of these services may record sessions and make them available for later visual playback.

### **Microsoft Clarity (Microsoft Corporation)**

Microsoft Clarity is a session recording and heat mapping service provided by Microsoft Corporation. Microsoft processes or receives Personal Data via Microsoft Clarity, which in turn may be used for any purpose in accordance with the Microsoft Privacy Statement, including improving and providing Microsoft Advertising.

Personal Data processed: clicks; country; custom events; device information; diagnostic events; interaction events; layout details; page events; positional information; scroll-to-page interactions; session duration; time zone; Trackers; Usage Data.

Place of processing: United States – [Privacy Policy](#).

### **Interaction with external social networks and platforms**

This type of service allows interaction with social networks or other external platforms directly from the pages of this Website.

The interaction and information obtained through this Website are always subject to the User's privacy settings for each social network.

This type of service might still collect traffic data for the pages where the service is installed, even when Users do not use it.

It is recommended to log out from the respective services in order to make sure that the processed data on this Website isn't being connected back to the User's profile.

### **Buffer button and social widgets (Buffer)**

The Buffer button and social widgets are services allowing interaction with the Buffer service provided by Buffer, Inc.

Personal Data processed: Usage Data.

Place of processing: United States – [Privacy Policy](#).

### **LinkedIn button and social widgets (LinkedIn Corporation)**

The LinkedIn button and social widgets are services allowing interaction with the LinkedIn social network provided by LinkedIn Corporation.

Personal Data processed: Cookies; Usage Data.

Place of processing: United States – [Privacy Policy](#).

### **Google+ +1 button and social widgets**

The Google+ +1 button and social widgets are services allowing interaction with the Google+ social network provided by Google Inc.

Personal Data processed: Cookies; Usage Data.

Place of processing: United States – [Privacy Policy](#); Ireland – [Privacy Policy](#).

### **Facebook Like button and social widgets (Facebook, Inc.)**

The Facebook Like button and social widgets are services allowing interaction with the Facebook social network provided by Facebook, Inc.

Personal Data processed: Cookies; Usage Data.

Place of processing: United States – [Privacy Policy](#).

### **Twitter Tweet button and social widgets (X Corp.)**

The Twitter Tweet button and social widgets are services allowing interaction with the Twitter social network provided by Twitter, Inc.

Personal Data processed: Cookies; Usage Data.

Place of processing: United States – [Privacy Policy](#).

### **Pinterest “Pin it” button and social widgets (Pinterest)**

The Pinterest “Pin it” button and social widgets are services allowing interaction with the Pinterest platform provided by Pinterest Inc.

Personal Data processed: Cookies; Usage Data.

Place of processing: United States – [Privacy Policy](#).

### **YouTube button and social widgets (Google Inc.)**

The YouTube button and social widgets are services allowing interaction with the YouTube social network provided by Google Inc.

Personal Data processed: Usage Data.

Place of processing: United States – [Privacy Policy](#).

### **Managing contacts and sending messages**

This type of service makes it possible to manage a database of email contacts, phone contacts or any other contact information to communicate with the User.

These services may also collect data concerning the date and time when the message was viewed by the User, as well as when the User interacted with it, such as by clicking on links included in the message.

### **MailUp (MailUp)**

MailUp is an email address management and message sending service provided by MailUp SpA.

Personal Data processed: email address; first name.

Place of processing: Italy – [Privacy Policy](#).

## **Registration and authentication**

By registering or authenticating, Users allow this Website to identify them and give them access to dedicated services.

Depending on what is described below, third parties may provide registration and authentication services. In this case, this Website will be able to access some Data, stored by these third-party services, for registration or identification purposes.

Some of the services listed below may also collect Personal Data for targeting and profiling purposes; to find out more, please refer to the description of each service.

### **Instagram Authentication**

Instagram Authentication is a registration and authentication service provided by Facebook, Inc. or by Facebook Ireland Ltd, depending on how the Owner manages the Data processing, and is connected to the Instagram social network.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: United States – [Privacy Policy](#); Ireland – [Privacy Policy](#).

## **Registration and authentication provided directly by this Website**

By registering or authenticating, Users allow this Website to identify them and give them access to dedicated services. The Personal Data is collected and stored for registration or identification purposes only. The Data collected are only those necessary for the provision of the service requested by the Users.

### **Direct registration (this Website)**

The User registers by filling out the registration form and providing the Personal Data directly to this Website.

Personal Data processed: city; company name; email address; last name; various types of Data; ZIP/Postal code.

## **SPAM protection**

This type of service analyzes the traffic of this Website, potentially containing Users' Personal Data, with the purpose of filtering it from parts of traffic, messages and content that are recognized as SPAM.

### **Akismet (Automattic Inc.)**

Akismet is a SPAM protection service provided by Automattic Inc.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: United States – [Privacy Policy](#).

## **Tag Management**

This type of service helps the Owner to manage the tags or scripts needed on this Website in a centralized fashion.

This results in the Users' Data flowing through these services, potentially resulting in the retention of this Data.

### **Google Tag Manager**

Google Tag Manager is a tag management service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing.

Personal Data processed: Usage Data.

Place of processing: United States – [Privacy Policy](#); Ireland – [Privacy Policy](#).

# Cookie Policy

This Website uses Trackers. To learn more, Users may consult the [Cookie Policy](#).

## Further Information for Users

### Legal basis of processing

The Owner may process Personal Data relating to Users if one of the following applies:

- Users have given their consent for one or more specific purposes.
- provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof;
- processing is necessary for compliance with a legal obligation to which the Owner is subject;
- processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Owner;
- processing is necessary for the purposes of the legitimate interests pursued by the Owner or by a third party.

In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

### Further information about retention time

Unless specified otherwise in this document, Personal Data shall be processed and stored for as long as required by the purpose they have been collected for and may be retained for longer due to applicable legal obligation or based on the Users' consent.

Therefore:

- Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until such contract has been fully performed.
- Personal Data collected for the purposes of the Owner's legitimate interests shall be retained as long as needed to fulfill such purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the relevant sections of this document or by contacting the Owner.

The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Owner may be obliged to retain Personal Data for a longer period whenever required to fulfil a legal obligation or upon order of an authority.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right of access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

## The rights of Users based on the General Data Protection Regulation (GDPR)

Users may exercise certain rights regarding their Data processed by the Owner.

In particular, Users have the right to do the following, to the extent permitted by law:

- **Withdraw their consent at any time.** Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- **Object to processing of their Data.** Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent.
- **Access their Data.** Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- **Verify and seek rectification.** Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- **Restrict the processing of their Data.** Users have the right to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.
- **Have their Personal Data deleted or otherwise removed.** Users have the right to obtain the erasure of their Data from the Owner.
- **Receive their Data and have it transferred to another controller.** Users have the right to receive their Data in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another controller without any hindrance.

- **Lodge a complaint.** Users have the right to bring a claim before their competent data protection authority.

Users are also entitled to learn about the legal basis for Data transfers abroad including to any international organization governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by the Owner to safeguard their Data.

### **Details about the right to object to processing**

**Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing by providing a ground related to their particular situation to justify the objection.**

**Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time, free of charge and without providing any justification. Where the User objects to processing for direct marketing purposes, the Personal Data will no longer be processed for such purposes. To learn whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.**

### **How to exercise these rights**

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. Such requests are free of charge and will be answered by the Owner as early as possible and always within one month, providing Users with the information required by law. Any rectification or erasure of Personal Data or restriction of processing will be communicated by the Owner to each recipient, if any, to whom the Personal Data has been disclosed unless this proves impossible or involves disproportionate effort. At the Users' request, the Owner will inform them about those recipients.

## **Transfer of Personal Data outside of the European Union**

### **Data transfer to countries that guarantee European standards**

If this is the legal basis, the transfer of Personal Data from the EU to third countries is carried out according to an adequacy decision of the European Commission.

The European Commission adopts adequacy decisions for specific countries whenever it considers that country to possess and provide Personal Data protection standards comparable to those set forth by EU data protection legislation. Users can find an updated list of all adequacy decisions issued on the European Commission's website.

### **Data transfer abroad based on consent**

If this is the legal basis, Personal Data of Users shall be transferred from the EU to third countries only if the User has explicitly consented to such transfer, after having been informed of the possible risks due to the absence of an adequacy decision and appropriate safeguards.

In such cases, the Owner shall inform Users appropriately and collect their explicit consent via this Website.

### **Other legal basis for Data transfer abroad**

If no other legal basis applies, Personal Data shall be transferred from the EU to third countries only if at least one of the following conditions is met:

- the transfer is necessary for the performance of a contract between the User and the Owner or of pre-contractual measures taken at the User's request;
- the transfer is necessary for the conclusion or performance of a contract concluded in the interest of the User between the Owner and another natural or legal person;
- the transfer is necessary for important reasons of public interest;
- the transfer is necessary for establishment, exercise or defence of legal claims;
- the transfer is necessary in order to protect the vital interests of the data subject or of other persons, where the data subject is physically or legally incapable of giving consent. In such cases, the Owner shall inform the User about the legal bases the transfer is based on via this Website.

## **Additional information about Data collection and processing**

### **Legal action**



The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of this Website or the related Services.

The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.

## **Additional information about User's Personal Data**

In addition to the information contained in this privacy policy, this Website may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

## **System logs and maintenance**

For operation and maintenance purposes, this Website and any third-party services may collect files that record interaction with this Website (System logs) or use other Personal Data (such as the IP Address) for this purpose.

## **Information not contained in this policy**

More details concerning the collection or processing of Personal Data may be requested from the Owner at any time. Please see the contact information at the beginning of this document.

## **Changes to this privacy policy**

The Owner reserves the right to make changes to this privacy policy at any time by notifying its Users on this page and possibly within this Website and/or - as far as technically and legally feasible - sending a notice to Users via any contact information available to the Owner. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.

Should the changes affect processing activities performed on the basis of the User's consent, the Owner shall collect new consent from the User, where required.

## **Definitions and legal references**

### **Personal Data (or Data)**

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

### **Usage Data**

Information collected automatically through this Website (or third-party services employed in this Website), which can include: the IP addresses or domain names of the computers utilized by the Users who use this Website, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

### **User**

The individual using this Website who, unless otherwise specified, coincides with the Data Subject.

### **Data Subject**

The natural person to whom the Personal Data refers.

### **Data Processor (or Processor)**

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

### **Data Controller (or Owner)**

The natural or legal person, public authority, agency or other body which, alone or jointly with others,

determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of this Website. The Data Controller, unless otherwise specified, is the Owner of this Website.

### **This Website (or this Application)**

The means by which the Personal Data of the User is collected and processed.

### **Service**

The service provided by this Website as described in the relative terms (if available) and on this site/application.

### **European Union (or EU)**

Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

### **Cookie**

Cookies are Trackers consisting of small sets of data stored in the User's browser.

### **Tracker**

Tracker indicates any technology - e.g Cookies, unique identifiers, web beacons, embedded scripts, e-tags and fingerprinting - that enables the tracking of Users, for example by accessing or storing information on the User's device.

### **Legal information**

This privacy policy relates solely to this Website, if not stated otherwise within this document.

Latest update: August 28, 2023