

PRIVACY POLICY

Information pursuant to the European Data Protection Regulation No.2016/679

In accordance with the provisions of Articles 13 and 14 of Regulation (EU) 2016/679 on the Protection of Personal Data (hereinafter also GDPR), the content below indicates the methods we adopt in respecting the privacy of visitors to this site, describing how we collect, use and protect personal information, the rights granted to them and the ways in which it is possible to contact us.

The Data Controller guarantees compliance with the Personal Data Protection Regulation (GDPR) and therefore, Data Subjects are encouraged to read this Privacy Policy carefully before submitting any kind of personal information and/or filling out any electronic form on this site. |

DATA CONTROLLER

The Data controller is AQuest S.r.l. - Via F. Garofoli, 233 - 37057 - San Giovanni Lupatoto (VR) P.I. 02552210235.

PROCESSING PURPOSES

AQuest S.r.l. informs that the processing of personal data collected directly from the website <https://www.aquest.it>, through the contact form, is aimed at:

- Providing information, clarifications, services and products requested by the interested party.
- Providing estimates, support and assistance regarding the implementation of a project indicated by the data subject.

Whereas the collection of personal data through the job application form is aimed at:

- Allowing the submission of an unsolicited application for open positions indicated on the site (this may result in the candidate being contacted later, using the contact information provided, to further the information provided and/or receive additional information).

The compilation of forms and/or the sending of data by e-mail to the addresses indicated in the various sections of the site, as well as to any e-mail address of AQuest S.r.l., for the aforementioned purposes, may entail the subsequent acquisition of the sender's e-mail address, as well as any further personal data through subsequent communications. Such processing of personal data is based on the principle expressed in Art. 6 of the Regulations, according to which processing is lawful if it is necessary for the performance of a contract to which the data subject is a party, of pre-contractual measures, as well as for the performance of the service requested by the data subject.

Contact data may also be collected and processed in order to proceed with the subscription to the newsletter, which allows:

- To receive indications, suggestions on services, products, training activities and events carried out by the Controller that we believe may be of interest, as well as to receive informative and promotional materials and other communications of various kinds.

Regarding the processing of the aforementioned data for marketing activities, the processing is lawful as it is carried out following your specific and explicit consent, which you are free to give or not and which can be revoked at any time.

The provision of the aforementioned data is optional in nature, however, it is necessary in order to satisfy the request of the data subject: without such data from you, in fact, it is not possible to follow up on requests, as well as to initiate business or commercial relationships.

TYPLOGIES OF PERSONAL DATA COLLECTED

- **Newsletter subscription form:** personal data collected and processed concern the identification and contact data necessary for the Holder to proceed with the sending of newsletters.

- **"Tell us about your project and find out how we can help your business" form:** personal data collected and processed are personal details, contact data, professional role and information freely submitted in relation to the project to be launched.

- **Application form:** personal data collected and processed are personal data, contact data and, if a curriculum vitae is attached, the image of the data subject, previous work experience, training activities carried out and any special data (Data related to health, union membership, political opinions, etc.).

The same data indicated above may also be collected by the Data Controller through other communication channels, such as e-mail addresses made available to users and/or the Data Controller's social networks.

In addition to the common data provided directly and intentionally by the user, the computer systems and software procedures used to operate this website may acquire, during their normal operation, some personal navigation data whose transmission is implicit in the use of Internet communication protocols. For more information in this regard, please refer to the dedicated Cookie Policy.

It involves information that is not collected to be associated with identified data subjects but which, by its very nature, could allow users to be identified through processing and association also with data held by third parties. This category of data includes IP addresses or the domain names of the computers used, URI (Uniform Resource Identifier) notation addresses of the resources requested, the time of the requests, the methods used in submitting requests to the server, the size of the files obtained in response, the numerical codes indicating the statuses of the responses given by the server (successful, error, etc.) and other parameters relating to the users' Operating System and computer environment. These data are used for the sole purpose of obtaining anonymous statistical information on the use of the site and to check its correct functioning.

METHODS OF PROCESSING

The processing of personal data means their collection, recording, organization, storage, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, dissemination, deletion and destruction, or the combination of two or more of these operations, including by means of automated tools designed to store, manage and transmit the data.

As far as security is concerned, we inform that the database is accessible only by personnel authorized to process data on behalf of the Data Controller or by external personnel in charge and appointed, and that the processing of the data of the data subject will be carried out by means and instruments suitable to guarantee their confidentiality and may be carried out through electronic or automated means and eventually through non-automated means (paper archives), both provided with adequate security measures, as provided for in the EU Regulation 2016/679 on the Protection of Personal Data, to prevent data loss, illicit or incorrect use and unauthorized access. In addition, data will be processed only for the time strictly necessary to achieve the purposes for which it was collected.

COMMUNICATION TO THIRD PARTIES

The Data Controller will communicate the personal data provided by users only to internal subjects, formally appointed as authorized to process personal data, and to external suppliers selected to support the requested service, also appropriately appointed as Data Processors, such as:

- Individuals who provide IT services to the Data Controller, such as companies that perform maintenance and technical support activities for the information systems, databases, telecommunications networks, and the website <https://www.aquest.it>.
- Consultants and collaborators;
- Marketing companies;
- Personnel recruitment and selection companies;
- Additional parties to whom the communication of your data is necessary or in any case is functional for the performance of the activity envisaged by the pre-contractual or contractual relationship;
- Competent authorities, judicial authorities and/or other public bodies, should they request it or should the need or obligation to do so exist.

Any information collected through the website will be disclosed.

DATA RETENTION

The personal data provided when submitting a request to the dedicated email addresses or through this website will be kept by the Data Controller for the duration necessary to fulfill your request. In the case of a request to subscribe to our newsletter, your personal and contact data will be processed until you request to unsubscribe from the service (or revoke your consent) and for a maximum period of two years. Instead, data collected for purposes related to the project you may wish to submit to us will be kept for a period not exceeding 12 months.

DATA SUBJECT'S RIGHTS

Pursuant to EU Regulation 679/2016, the following are recognized and guaranteed to the data subject: the right to ask the Data Controller for access to personal data (Art. 15), rectification (Art. 16), erasure or to be forgotten (Art. 17), restriction of the processing of personal data concerning him/her (Art. 18), the right to data portability (Art. 20) or to object to the processing of data (Art. 21), as well as the right not to be subjected to a decision based solely on automated processing, including profiling, which produces legal effects concerning the data subject or similarly significantly affects him or her (Art. 22). Where the processing of personal data is based on the express consent provided, pursuant to Article 7 paragraph 3 of the Regulation, the possibility of withdrawing consent is recognized at any time.

Requests may be exercised against the Data Controller by the following means:

- by registered mail to the Controller's address: AQuest S.r.l. - Via F. Garofoli, 233 - 37057 - San Giovanni Lupatoto (VR), Italy.
- by writing to the e-mail address: gdpr@aquest.it

Likewise, it is recognized that the data subject has the right to lodge a complaint with the supervisory authority in charge (art. 77 of the Regulation) if he/she considers that the processing carried out by the Controller is not compliant.

DATA PROTECTION OFFICER

The Data Controller has appointed a Data Protection Officer (DPO), conferring a mandate to the company Getsolution di Paola Generali. The DPO can be contacted at the e-mail address: dpo-wppitaly@getsolution.it.

CHANGES TO THIS POLICY POLICY

AQuest S.r.l. reserves the right to revise this privacy policy at any time. In this regard, the data subjects are encouraged to consult this page periodically.

Privacy policy updated to October, 2022.

COOKIE POLICY

The website <https://www.aquest.it> of AQuest S.r.l., the Data Controller, hereinafter called “data controller”, uses cookie and similar technologies to ensure the proper functioning of the website and improve the experience of using website and other related applications from the user. This document provides detailed information on how they are used by the Data Controller and how to manage them.

DEFINITIONS

Cookies are short fragment of text that allow the web server to store information on the users’ device (computer, tablet, smartphone, etc.) to be reused during the same visit to the site (session cookies) or later, also many days later (persistent cookies). Cookies are stored through the browser (program used for browsing the internet), according to the user’s preferences. As stated in the guidelines of 10th June 2021 (Linee guida cookie e altri strumenti di tracciamento) *“Information encoded in cookies may include personal data, such as an IP address, a username, a unique identifier or an email address and it may also include non-personal data such as language settings or information on the type of device a person is using to navigate within the website.”*

Similar technologies, such as, for instance, web beacons, transparent GIFs and all forms of local storage introduced with HTML5, can be used to collect information on user behavior and use of services. The same result can be achieved also using other "passive" tools, such as fingerprinting, which is the technique that allows to identify the device used by the user through the collection of all or some of the information related to the specific configuration of the device itself adopted by the data subject.

In the following parties of this document, we will refer to cookies and other similar technologies just using the general term "cookies".

TYPES OF COOKIES

Depending on the features and use of cookies we can distinguish different categories:

- **Strictly necessary 'technical' cookies.** These cookies are essential for the proper functioning, navigation and use of the site, ensuring the Data Controller to provide the service (including, for example, manage the login and / or the access to restricted functions of the site, allow the purchase, etc.). The duration of cookies is strictly limited to the work session (when the browser is closed they are deleted). Their deactivation compromises the use of services accessible by login. The public part of the Data Controller’s site remains normally usable.
- **Analytical and performance cookies.** These are cookies used to collect and analyze traffic and use of the site. These cookies, even if they do not identify the user, allow, for example, to detect if the same user returns to log on at different times. They also permit to track the system and improve its performance and usability. These cookies can be deactivated without any loss of functionality.
- **Targeting cookies.** These are permanent cookies used to identify (anonymously or not) the user's preferences and improve their browsing experience. Profiling cookies allow the Data Controller to customize the provision of the service beyond what is strictly necessary for the purpose of providing the service, as well as to send targeted advertising messages in line with the preferences expressed by the user when surfing the web.

LEGAL BASIS: THE CONSENT LEGAL BASIS: THE CONSENT

For the use of **strictly necessary technical cookies**, the data controller will be only required to provide specific notice, which may be included within the general one, including their use in a codified hypothesis of exemption from the

obligation to obtain the consent of the data subject. The analytical cookies, used by the site, are subjected to anonymization and can be equivalent with technical cookies.

Cookies and other tracking tools used **for different purposes than technical ones** may, however, be used only after the acquisition of consent, however informed, by the user, based on the provisions of **Article 122 of the Privacy Code**, and respecting the requirements of **recital 32 of the Regulation ("GDPR")**.

COOKIE USED BY THIS WEBSITE

In detail, the table below shows all the technical and analytical cookies used by the Controller:

Name	Source	Function/purpose	Expiration
ARRAffinitySameSite	.www.aquest.it	Windows Azure platform technical cookie used to ensure that a visitor's browsing relies on the same server for the duration of the session.	Session
ARRAffinity	.www.aquest.it	Technical cookie used to balance traffic flow and facilitate data management within a session.	Session
__cf_bm	.hubspot.com	Technical cookie used to read and filter requests from bots.	30 minutes
__cf_bm	vimeo.com	Technical cookie used to read and filter requests from bots.	30 minutes
__cfruid	stories.aquest.it	Analytical cookie associated with sites using CloudFlare, used to identify trusted web traffic.	Session
__cf_bm	stories.aquest.it	Analytical cookie associated with sites using CloudFlare Bot Management used to read and manage incoming traffic.	30 minutes
_ym_d	.www.aquest.it	Analytical cookie used to store the first visit to the site.	12 months (1 year)
_ym_uid	.www.aquest.it	Analytical cookie used to record and track user identity.	12 months (1 year)
_ym_isad	.www.aquest.it	Analytical cookie used to determine whether the user has an ad-blocker installed on their browser	20 hours
_ym_visorc	.www.aquest.it	Analytical cookie used to make the session work properly	30 minutes
__hstc	.www.aquest.it	Analytical cookie used to track the user (domain, first visit, last visit, etc.).	6 months
__hssrc	.www.aquest.it	Analytical cookie used to record session ID	Session
__hssc	.www.aquest.it	Analytical cookie used to record anonymous statistics	30 minutes

__hs_cookie_cat_pref	.www.aquest.it	Analytical cookie used to record the categories to which the visitor has consented.	6 months
yabs-sid	.yandex.ru	Analytical cookie used to record data on the behavior of users browsing the site for website analysis and optimization	Session
yandexuid	.yandex.ru	Analytical cookie used to identify users and their behavior while browsing the site	12 months (1 year)
ymex	.yandex.ru	Analytical cookie used to identify users and their behavior while browsing the site	12 months (1 year)
AnalyticsSyncHistory	.linkedin.com	Analytical cookie used to store information about the date a synchronization took place with the lms_analytics cookie.	1 month
UserMatchHistory	.linkedin.com	Analytical cookie used for the ID synchronization process. Stores date and time of the last synchronization to avoid repeating the synchronization process frequently.	1 month
bcookie	.linkedin.com	Analytic cookie, that contains the browser used, to uniquely identify the devices on which LinkedIn is accessed to detect abuse on the platform.	24 hours
bscookie	.linkedin.com	Analytic cookie used to remember that a logged-in user has been verified via two-factor authentication.	12 months (1 year)
lang	.linkedin.com	Analytic cookie used to remember a user's language settings.	Session
li_gc	.linkedin.com	Analytical cookie used to store users' consent regarding the use of cookies for non-essential purposes.	6 months
lidc	.linkedin.com	Analytical cookie used to optimize data center selection.	24 hours

Facebook

The site uses Facebook-owned targeting cookies to enable promotion of business when the social network, or other platforms supported by Facebook Advertising, are used by the user. For the use of these cookies, the user is asked for prior consent through the appropriate banner.

For further information, please refer to the link below:

<https://www.facebook.com/policies/cookies/>

Yandex

The site uses targeting cookies provided by Yandex in order to optimize the promotion of the services offered by the Data Controller. For the use of the cookies, prior consent from the user is required.

For more information, please refer to the following pages:

<https://browser.yandex.ru/help/personal-data-protection/personal-data-protection.html>

https://yandex.com/legal/cookies_policy_eng/

The table below shows all the targeting cookies used by the Controller

Name	Source	Function/purpose	Expiration
Hubspotutk	.www.aquest.it	Targeting cookie used to record and track user identity	6 months
_fbp	.www.aquest.it	Targeting cookie used by Facebook to provide a variety of products and advertisements from third parties	3 months
yuidss	.yandex.ru	Targeting cookie used to record data on the behavior of users browsing different websites to optimize the relevance of advertising	12 months (1 year)
i	.yandex.ru	Targeting cookie used to identify users	10 years

COOKIE RETENTION

Some cookies (**session cookies**) remain active only until the closing of the browser or the execution of the logout command. Other cookies "survive" after the browser is closed and are also available on further visits by the user. These cookies are called **persistent**, and their duration is fixed by the server at the time of their creation. In some cases, an expiry date is set, in other cases the duration is unlimited.

The Data Controller's website makes use of either session cookies or persistent cookies.

Please note that by browsing the pages of the Controller's website, you may interact with sites managed by third parties who may create or modify cookies.

COOKIE MANAGEMENT

The user can decide to accept cookies or not, using the settings of the browser.

Attention: it is not allowed to disable all or part of the technical cookies "strictly necessary", in order not to compromise the use of site features dedicated to users.

Disabling technical cookies that are not strictly necessary and other tracking tools for purposes other than technical ones does not affect navigability in any way.

The setting can be defined specifically for different websites and web applications. In furthermore, the best browsers allow to define different settings for "owner" and "third party" cookies. For more details, please refer to the links below:

- Chrome: <https://support.google.com/chrome/answer/95647>
- Firefox: <https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer>
- Internet Explorer: <https://support.microsoft.com/en-us/windows/delete-and-manage-cookies-168dab11-0753-043d-7c16-ed5947fc64d>
- Opera: <http://help.opera.com/Windows/10.00/it/cookies.html>
- Safari: <https://support.apple.com/HT201265>

CHANGES TO THIS POLICY

The Data Controller reserves the right to modify this policy whenever necessary. Users are encouraged to check this page periodically in case they want to keep track of such changes.