

# **Privacy Policy**

# **Privacy Policy of Piona Engineering SA**

This Application collects some Personal Data of its Users.

#### Data Controller.

PIONA ENGINEERING SA Via Cantonale 35 a Owner's email address: piona@piona.ch

## **Types of Data Collected**

Among the Personal Data collected by this Application, either independently or through third parties, are: Cookies, Usage Data, First Name, Last Name, and Email.

Full details on each type of Data collected are provided in the dedicated sections of this privacy policy or through specific informational texts displayed prior to the collection of such Data.

Personal Data may be freely provided by the User or, in the case of Usage Data, automatically collected during the use of this Application.

Unless otherwise specified, all Data requested by this Application are mandatory. If the User refuses to provide them, it may be impossible for this Application to provide the Service. In cases where this Application indicates certain Data as optional, Users are free to refrain from communicating such Data, without this having any consequence on the availability of the Service or its operation.

Users in doubt about which Data are mandatory are encouraged to contact the Data Controller.

The possible use of Cookies - or other tracking tools - by this Application or the owners of third party services used by this Application, where not otherwise specified, has the purpose of providing the Service requested by the User, in addition to the further purposes described in this document and in the Cookie Policy, if available.

The User assumes responsibility for the Personal Data of third parties obtained, published or shared through this Application and warrants that he/she has the right to communicate or disseminate it, releasing the Owner from any liability towards third parties.

### Mode and place of processing of the Data collected

### **Modalities of processing**

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

The processing is carried out by means of computer and/or telematic tools, with organizational methods and logics strictly related to the indicated purposes. In addition to the Data Controller, in some cases, other subjects involved in the organization of this Application (administrative, commercial, marketing, legal, system administrators personnel) or external subjects (such as third



party technical service providers, postal couriers, hosting providers, companies IT, communication agencies) also appointed, if necessary, as Data Processors by the Data Controller. The updated list of Data Processors can always be requested from the Data Controller.

# Legal basis of the processing

The Data Controller processes Personal Data related to the User in case one of the following conditions exists:

- the User has given consent for one or more specific purposes; Note: In some jurisdictions, the Controller may be authorized to process Personal Data without the need for the User's consent or another of the legal bases specified below, as long as the User does not object ("opt-out") to such processing. However, this does not apply if the processing of Personal Data is regulated by European legislation on the protection of Personal Data;
- the processing is necessary for the performance of a contract with the User and/or the performance of pre-contractual measures;
- the processing is necessary for the performance of a legal obligation to which the Controller is subject;
- processing is necessary for the performance of a task of public interest or the exercise of public authority vested in the Controller;
- the processing is necessary for the pursuit of the legitimate interest of the Controller or third parties.

However, it is always possible to ask the Controller to clarify the concrete legal basis of each processing and in particular to specify whether the processing is based on law, required by a contract or necessary to conclude a contract.

## Location

The Data are processed at the operating offices of the Data Controller and in any other place where the parties involved in the processing are located. For more information, please contact the Data Controller.

The User's Personal Data may be transferred to a country other than the country where the User is located. To obtain more information about the location of the processing, the User may refer to the section on Personal Data processing details.

The User has the right to obtain information regarding the legal basis for the transfer of Data outside the European Union or to an international organization under public international law or consisting of two or more countries, such as the UN, as well as regarding the security measures taken by the Data Controller to protect the Data.

Should any of the transfers just described take place, the User may refer to the respective sections of this document or request information from the Data Controller by contacting it at the contact details given at the beginning.

#### **Retention Period.**



The Data are processed and stored for the time required by the purposes for which they were collected.

- Personal Data collected for purposes related to the performance of a contract between the Data Controller and the User will be retained until the performance of that contract is completed.
- Personal Data collected for purposes related to the legitimate interest of the Data Controller will be retained until such interest is satisfied. The User may obtain further information regarding the legitimate interest pursued by the Controller in the relevant sections of this document or by contacting the Controller.

When processing is based on the User's consent, the Data Controller may keep the Personal Data longer until such consent is revoked. In addition, the Controller may be obliged to retain Personal Data for a longer period in compliance with a legal obligation or by order of an authority.

At the end of the retention period, the Personal Data will be deleted. Therefore, at the expiration of this period the right of access, deletion, rectification and the right to Data portability can no longer be exercised.

#### **Purposes of the Data collected**

User Data is collected to enable the Data Controller to provide its Services, as well as for the following purposes: Statistics and Contacting the User.

To obtain further detailed information on the purposes of the processing and the Personal Data concretely relevant for each purpose, the User may refer to the relevant sections of this document.

Details on the processing of Personal Data

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

- Contacting the User
- Statistics

### **User Rights**

Users may exercise certain rights with respect to the Data processed by the Data Controller.

In particular, the User has the right to:

- revoke consent at any time. The User may revoke the consent to the processing of its Personal Data previously expressed.
- object to the processing of their Data. The User may object to the processing of its Data when it is done on a legal basis other than consent. Further details on the right to object are provided in the section below.
- access to one's own Data. The User has the right to obtain information about the Data processed by the Data Controller, certain aspects of the processing and to receive a copy of the Data processed.



- verify and request correction. Users may verify the correctness of their Data and request that it be updated or corrected.
- obtain restriction of processing. When certain conditions are met, the User may request the restriction of the processing of its Data. In this case, the Data Controller will not process the Data for any purpose other than its preservation.
- Obtain the deletion or removal of their Personal Data. When certain conditions are met, the User may request the deletion of their Data by the Data Controller.
- Receive their Data or have it transferred to another Data Controller. The User has the right to receive its Data in a structured, commonly used and machine-readable format and, where technically feasible, to have it transferred unimpeded to another data controller. This provision is applicable when the Data are processed by automated means and the processing is based on the User's consent, a contract to which the User is a party or contractual measures related thereto.
- Propose Complaint. The User may propose a complaint to the competent data protection supervisory authority or take legal action.

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# **Details on the right to object**

When Personal Data are processed in the public interest, in the exercise of public powers vested in the Data Controller or in pursuit of a legitimate interest of the Data Controller, Users have the right to object to the processing for reasons related to their particular situation.

Users should note that if their Data were processed for direct marketing purposes, they may object to the processing without providing any reasons. To find out whether the Data Controller processes Data with direct marketing purposes, Users can refer to the respective sections of this document.

#### **How to Exercise Rights**

To exercise the User's rights, Users may address a request to the contact details of the Controller indicated in this document. Requests are filed free of charge and processed by the Controller as soon as possible, in any case within one month.

# Further information on processing

#### **Defense in Court**

The User's Personal Data may be used by the Data Controller in court or in the preparatory stages of its possible establishment for the defense against abuses in the use of this Application or related Services by the User.

The User declares that he/she is aware that the Data Controller may be obliged to disclose the Data by order of public authorities.

#### **Specific Disclosures**



Upon the User's request, in addition to the information contained in this privacy policy, this Application may provide the User with additional and contextual disclosures regarding specific Services, or the collection and processing of Personal Data.

#### **System Logs and Maintenance**

For operation and maintenance purposes, this Application and any third-party services used by it may collect system logs, i.e., files that record interactions and may also contain Personal Data, such as the User's IP address.

### Information not contained in this policy

Further information in relation to the processing of Personal Data may be requested at any time from the Data Controller using the contact details.

# Responding to "Do Not Track" Requests

This Application does not support "Do Not Track" requests.

To find out whether any third-party services used support them, the User is encouraged to consult their respective privacy policies.

# Changes to this privacy policy

The Data Controller reserves the right to make changes to this privacy policy at any time by informing Users on this page and, if possible, on this Application as well as, when technically and legally feasible, by sending a notification to Users through one of the contact details held by the Data Controller. Therefore, please consult this page regularly, referring to the date of last modification indicated at the bottom.

If the changes affect processing whose legal basis is consent, the Controller will collect the User's consent again, if necessary.