

## **TTS – Technology Transfer System Srl – PRIVACY NOTICE**

TTS Technology Transfer System S.r.l., an Italian company set up according to Italian laws, having its registered office at Largo Caleotto nr. 1, 23900 Lecco (LC), duly registered in the Italy Enterprises Register with V.A.T. and fiscal code number 02094780133 and company registry code nr. 240299, is committed to ensuring the protection and confidentiality of your personal information (“personal data” as defined in applicable data protection law) that is submitted for the purposes indicated below. Therefore, in compliance with Article 13 of Legislative Decree 196/2003 (“Codice Privacy”) and the new European Regulation EU679 / 2016 GDPR (General Data Protection Regulation), through this information the user is informed about the collection, use, purposes and methods to access, modify, update or delete your personal data collected by us.

The management and collection of customer data is only functional for the purpose above and it is not activity of interest to TTS since we do not regularly nor systematically monitor users who visit our website and the TTS business does not concern the large-scale processing of particular categories of data or personal data relating to criminal convictions and offenses.

### **1. PERSONAL DATA COLLECTED**

#### **Navigation Data**

Information systems used to operate on our website collect, during normal operation, some personal data of the user whose transmission is implicit in the use of Internet communication protocols. Such data is not collected for the purpose of identifying the user, but may result in his/her identification, for example, if they are associated with additional data coming from third parties. This category of data includes the IP address and domain name of the user's computer, the Uniform Resource Identifier (URI) notation addresses, the time of the request, the method used to submit the request to Server, the file size obtained in response, the numeric code that indicates the server response and other parameters related to the user's operating system. These data are only used to obtain anonymous statistical information on the use of our website and to check that it is working properly, and are deleted immediately afterwards. Such data may be used for the detection of liability in the event of hypothetical cybercrime for damage to our website.

#### **Registration Data**

We will handle the personal information you provide when creating an account and / or registering a purchased product, and if the user requires information, assistance, or when purchasing TTS products through the website, only to the extent in which they are necessary to achieve the purposes described in this information document. TTS is obliged to anonymize personal data and remove the identification data if there is no need to treat personal data in identifiable form for its purpose of processing.

#### **Data collected through cookies and other similar tracking technologies**

Cookies are small data files sent to user devices by the visited website. Cookies are stored in the device memory used to access the website (e.g.: computers, smartphones, tablets, and any other device used to access websites). If the user re-accesses the site, the browser reads the cookies stored on the device and transmits the data to the website from which the cookie originated. Our website does not currently use cookies.

### **2. PURPOSES OF THE PROCESS**

A) Once we have received the personal information, TTS will process it for the following purposes:

- Managing the relationship with you resulting from your product or service purchase;
- Keeping records of and tracking our communications and correspondence with you, complying with any related legal requirements as well as any internal accounting, administrative and tax requirements, process and policy;
- Sharing it with our carefully chosen partners, upon your consent given in advance, for their use for the same purposes described in this notice.

B) Where you have agreed to this, unless already allowed under other legal grounds and justifications, we may use the personal information to send you by email, SMS, MMS (and other electronic means), fax, post and telephone containing the following:

- marketing about novelties, gifts, product information or new product launches, products promotions / sales offers or online sales offers;
- marketing and commercial offers and communications (e.g.: newsletters) about extended warranties provided through “TTS”, on products or service you have registered or shown an interest in;
- invitations to participate in product or customer service surveys.

If you wish to unsubscribe from any marketing material that we may send you or related activity as described above, you can easily do this by following the unsubscribe details provided in each marketing communication or alternatively by contacting us at the following address:

[info@ttsnetwork.com](mailto:info@ttsnetwork.com)

### **3. WHO WILL SEE YOUR PERSONAL INFORMATION**

The personal information will be collected and processed for the above purposes by our staff when they are dealing with administration, accounting, marketing and promotions, customer care, IT systems administration, management, maintenance and development, marketing, surveys and promotions, as relevant to the purposes described in this notice. Your personal information will be stored on TTS database as well as on database managed through external providers, with which TTS has signed a proper agreement. These databases are located in the European Union.

Please be aware that certain personal information could also be reported to authorities and public bodies in the relevant local territories, in general for legal and tax purposes, or where it is reasonable to do so to protect TTS business, customers, staff or suppliers. Furthermore, it may be disclosed to prospective purchasers or partners and their professional advisers, for exploring any proposed sale or transfer of the company, or its business or assets, commercial partnerships or joint venture arrangements that may arise from time to time, to the extent that anonymisation is not possible or feasible. On completion of the transaction, purchasers and partners may use the information for the same purposes as set out in this notice.

### **4. WHEN THE PERSONAL INFORMATION WILL BE TRANSFERRED ABROAD**

Local privacy laws allow TTS to transfer personal information to other countries provided that you have given your consent in advance or another legal justification exists and an adequate level of protection is assured.

### **5. CHILDREN PRIVACY**

This website is not intended for individuals under the age of 18, nor do we personally collect personal information from individuals under the age of 18.

### **6. RETAINING THE PERSONAL INFORMATION**

TTS undertakes to respect the security of the data provided by the user and takes all reasonable precautions to protect such personal data against loss, improper use or modifications, with particular attention to the security measures referred to in the New European Regulation EU679 / 2016 GDPR. If you have any doubts about the security of your personal data, you can contact us at the addresses below. TTS will process and store your personal data for as long as necessary to comply with the law or for the purposes described in this statement.

### **7. WHICH RIGHTS ARE GRANTED TO YOU**

EU privacy laws allow you to check whether TTS holds personal information about you, and if so, to be provided with a copy of it, together with details of how and for what purposes it is processed by TTS. You can also ask to have personal information we hold about you, to update and/or correct it and, if allowed by applicable law,

even delete it. You can also withdraw any given consent concerning the processing of your personal data at any time.

If you wish to exercise your rights as above, to change your preferences about being kept informed, or to notify TTS of any change to your details, or put any question about the use of your personal information by TTS please contact us via e-mail to [privacy@ttsnetwork.com](mailto:privacy@ttsnetwork.com).

## **8. CONTACTS**

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact us via e-mail to [info@ttsnetwork.com](mailto:info@ttsnetwork.com).

We reserve the right to change or update this Privacy Policy at any time and any changes we make in the future will be published on our website. The user is therefore encouraged to review the TTS website at [www.ttsnetwork.com](http://www.ttsnetwork.com) to verify any changes or updates to this Privacy Policy.

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