



## **PRIVACY POLICY AND NOTICE PURSUANT TO ART. 13 GENERAL DATA PROTECTION REGULATION (EU) 2016/679 (GDPR) (European regulation on the protection of personal data)**

This Privacy Policy is intended to illustrate the methods and purposes of the processing of personal data carried out by Comer S.r.l. as data controller of the website <https://www.comergroup.it> and the services connected thereto. Comer S.r.l. respects the privacy of every user who visits the Site and uses the Services. This Policy does not apply to third-party sites accessible via links on the Controller's Site. The processing of Users' personal data is carried out in full compliance with the General Data Protection Regulation (EU) 2016/679.

### **1. Identity and contact details of the Data Controller**

The Data Controller is Comer S.r.l. - Via Oroboni, 26/28 – 27029 Vigevano (PV) - VAT No. | Tax Code 00174100180 – Tel. 0381 42661 – [privacy@comergroup.it](mailto:privacy@comergroup.it).

### **2. Types of data collected and methods of collection**

#### **2.1 Browsing data**

The IT systems and software procedures used for the operation of the site acquire, in the course of their normal operation, certain personal data whose transmission is implicit in the use of Internet communication protocols. This is information that is not collected in order to be associated with identified data subjects, but which by its very nature could, through processing and association with data held by third parties, allow users to be identified. This category includes: – IP addresses or domain names of computers and terminals used by users; – URI/URL addresses of the requested resources; – the time of the request; – the method used to submit the request to the server; – the size of the file obtained in response; – the numerical code indicating the status of the response from the server (success, error, etc.); – other parameters relating to the user's operating system and IT environment (browser, operating system, etc.).

#### **2.2 Data voluntarily provided by the user via the contact form**

Identification and contact details (name, telephone number, e-mail address) entered by the User in the request forms on the home page and in the Contacts section. The voluntary sending of messages to the Controller's contact addresses and the completion of forms entail the acquisition of the sender's data, necessary to provide a response, as well as all personal data included in the communications. Where necessary, specific notices are published on the web pages relating to services with different purposes.



Completing and submitting the form presupposes prior acknowledgement of this notice, confirmed by means of a dedicated checkbox. The provision of data marked as mandatory is necessary to process the request; failure to provide such data makes it impossible to proceed with the request.

### 2.3 Data provided via the Reserved Area

The site has a password-protected area reserved for customers. Access is granted via credentials provided directly by the Controller to the customer within the scope of the professional relationship. In this context, the data necessary for authentication and management of the customer portal are processed (e.g. price lists, technical data sheets).

### 2.4 Data collected via direct communications

Should the user contact Comer S.r.l. via the e-mail addresses published on the site and/or by telephone, the personal data contained in the communication will be processed solely for the purpose of handling the request.

### 2.5 Data collected via cookies and similar technologies

The site uses technical cookies necessary for its operation (e.g. management of access to the reserved area, language preferences), analytical cookies (Google Analytics 4) and third-party services for form security (Google reCAPTCHA, Cloudflare Turnstile) and the display of content (Google Fonts). For a detailed description of the cookies used, their purposes and the methods for granting or refusing consent, please refer to the Cookie Policy available on the Site.

## 3. Purposes of processing and legal bases

The table below describes the purposes for which personal data are processed, the relevant legal basis pursuant to Art. 6 of the GDPR, and the applicable retention periods.

Purpose of processing	Type of data	Legal basis (Art. 6 of the GDPR)	Retention period
Handling contact requests (form)	Identification and contact data; content of the request	Art. 6(1)(b): steps taken at the request of the data subject prior to entering into a contract	Until the conclusion of the assessment procedure
Access to the Customer Reserved Area	E-mail, password, access logs	Art. 6(1)(b): performance of a contract	For the duration of the relationship
Compliance with legal obligations	Relevant personal data	Art. 6(1)(c): legal obligation	In accordance with applicable legislation (generally 10 years)



Purpose of processing	Type of data	Legal basis (Art. 6 of the GDPR)	Retention period
Site navigation and security (system logs)	IP addresses, access logs, device technical data	Art. 6(1)(f): legitimate interest in IT security	7 days, unless required for the investigation of offences or legal protection
Spam prevention and contact form security (Google reCAPTCHA, Cloudflare Turnstile)	Browsing data, IP, user behaviour	Art. 6(1)(f): legitimate interest in IT security and prevention of abuse	In accordance with the respective providers' terms (see Cookie Policy)
Statistical analysis of site usage (Google Analytics 4)	Aggregated or pseudonymised browsing data	Art. 6(1)(a): consent (cookie banner); Art. 6(1)(f): legitimate interest for anonymous aggregate statistics	In accordance with cookie settings (see Cookie Policy)
Marketing and newsletter distribution	Identification and contact data	Art. 6(1)(a): consent of the data subject	Maximum 24 months; withdrawable at any time
Protection of rights before judicial or extrajudicial bodies	All data necessary for the defence	Art. 6(1)(f): legitimate interest in legal protection	For the entire duration of the proceedings and until the decision becomes final

#### 4. Nature of the provision of data and consequences of refusal

The provision of personal data via the contact form is optional but necessary for the handling of the request: failure to provide the mandatory data (name, e-mail, message) makes it impossible for the Controller to respond. The provision of data for marketing/newsletter distribution purposes is optional and does not affect the relationship between the parties.

#### 5. Methods of processing

All personal data will be processed using both paper-based and electronic tools. The Data Controller has adopted all necessary technical and organisational measures appropriate to ensure a high level of security in order to minimise the risks relating to the confidentiality, availability and integrity of the personal data collected and processed, pursuant to Arts. 24, 25 and 32 of the GDPR.



## 6. Communication and disclosure of data

The personal data processed will be communicated to clearly defined parties. On the basis of their roles and job functions, internal and external personnel are authorised to process data within the limits of their responsibilities and in accordance with the instructions given to them by the Controller. The same data may be communicated, in the capacity of processors pursuant to Art. 28 of the GDPR, to:

- IT and hosting service providers that manage the website infrastructure;
- parties responsible for the maintenance of the technical aspects of the site (web agencies, etc.);
- Google LLC, as provider of Google Analytics 4, Google reCAPTCHA and Google Fonts;
- Cloudflare Inc., as provider of security and CAPTCHA services (Cloudflare Turnstile);
- external professionals collaborating with Comer (consultants, occasional workers);
- parties to whom legislative or EU regulatory provisions grant the right of access to data.

## 7. Data retention

Personal data will be retained for the period strictly necessary to achieve the purposes for which they were collected, in compliance with the principles of minimisation and storage limitation pursuant to Art. 5(1)(e) of the GDPR, and in any case not beyond the limitation periods provided for by applicable legislation. For details on the retention periods applicable to each purpose, please refer to the table in point 3.

## 8. Transfer of personal data to third countries

The management and storage of personal data relating to the operation of the website takes place on servers located within the European Union. The web hosting service is located in the EU. However, certain third-party services integrated into the site entail the transfer of personal data to non-EU countries, in particular to the United States of America. Specifically:

- Google LLC (Google Analytics 4, Google reCAPTCHA, Google Fonts): the transfer takes place on the basis of the Standard Contractual Clauses (SCCs) approved by the European Commission and, where applicable, of the EU-U.S. Data Privacy Framework;
- Cloudflare Inc. (Cloudflare Turnstile): the transfer takes place on the basis of the Standard Contractual Clauses (SCCs) approved by the European Commission. The Controller shall in any case adopt all necessary measures to ensure the protection of the personal data transferred, in accordance with Chapter V of Regulation (EU) 2016/679.

## 9. Processing of personal data of minors

The use of the Site and the Services is reserved exclusively for adult Users. Comer S.r.l. does not process personal data of minors.



## 10. Rights of the Data Subject

The Data Controller may be freely contacted for any enquiry relating to this Policy by writing to [privacy@comergroup.it](mailto:privacy@comergroup.it). The user may, at any time, exercise the rights referred to in Arts. 15, 16, 17, 18, 20 and 21 of Regulation (EU) 2016/679, where exercisable, by sending a specific request to the Controller via the contact channels indicated in this notice. With reference to Art. 7 of the GDPR, the data subject may withdraw consent given at any time by notifying the Data Controller. Withdrawal of consent does not affect the lawfulness of the processing carried out prior to the withdrawal. The data subject also has the right to lodge a complaint with the competent supervisory authority. The Controller does not carry out any automated decision-making process, including profiling, pursuant to Art. 22 of the GDPR.

## 11. Cookie Policy

Please refer to the dedicated section on the site, which provides a detailed description of all cookies used, their purposes, the methods for granting or refusing consent, and the third parties involved.

## 12. Social Media – Community rules and content moderation

Comer's social media pages and channels (Facebook/Meta, LinkedIn and Instagram) are professional spaces dedicated to sharing institutional and informational content relating to the company's activities, products, technological innovations in the electric motor sector and Comer S.r.l.'s initiatives. In order to ensure a respectful and constructive environment, Comer reserves the right to moderate content published by users, applying the following rules.

### 12.1 Prohibited content

Comer S.r.l. will remove, without prior notice, comments or contributions that: – contain insults, offensive language, discriminatory language, incitement to hatred or violence; – spread false, misleading or unverified information; – infringe the intellectual property rights of third parties (copyright, trademarks, patents); – contain personal data of third parties published without consent; – constitute spam, unsolicited advertising or promotion of competing products/services; – contain pornographic, violent or otherwise inappropriate material; – relate to sensitive personal data of third parties (health, judicial, financial data, etc.); – violate the terms of use of the hosting platform.

### 12.2 Confidentiality of information

Users are requested not to publish their own or third parties' personal data in public comments. Such information, if necessary for a consultation, must be transmitted through the Company's dedicated channels. Comer is not responsible for confidential information published inappropriately by users.

### 12.3 Liability for content published by users

Users are personally responsible for the content they publish on the Company's social media pages. Comer is not responsible for damages arising from content published by third parties and reserves the



right to report to the platform and/or the competent authorities any content that constitutes a violation of the law.

#### **12.4 Comer S.r.l.'s right of reply**

Comer reserves the right to respond publicly or privately to comments and messages received.

#### **13. Links to third-party sites**

Comer S.r.l. shall under no circumstances be held liable for the processing carried out through or in connection with such third-party sites. Users are therefore urged to exercise the utmost caution in this regard, and to read the terms of use and the privacy and cookie policies published on the various sites/portals/social networks visited.

#### **14. Amendments and updates**

This Policy is updated and applicable from 10 April 2026. Any further amendments will be communicated to Users by means and within the timeframes deemed most appropriate by the Controller, in particular through publication on the Site.

