

Via delle Scuole, 3B 6900 Paradiso

# **Privacy Policy and Cookies Information** 679/2016/EU – GDPR - LPD

#### NAVIGATION INFORMATION AND COOKIES

This page describes how the site is managed with regard to the processing of personal data of users who consult it. The processing is always based on the principles of lawfulness and fairness in compliance with all current regulations and appropriate security measures are taken to protect the data.

This privacy policy is also given as a brief information pursuant to art.13 of the European Privacy Regulation 679/2016 (GDPR), art. 19 of the Federal Data Protection Act (LPD); in addition, pursuant to Cookie Provision No. 229 of 8 May 2014, we would like to inform visitors of the site about the use of data entered in and cookies used by the site itself.

The information is also provided pursuant to Recommendation No. 2/2001 adopted by the Working Group established by Art. 29 of Directive No. 95/46/EC. to those who interact with the web services of this site, in order to protect personal data, accessible electronically from the address: using any of our services and/or accepting this Policy, For example, by registering for one of our services, you consent to the collection and use of Personal Information as described in this Policy.

#### Personal information that we collect.at the time of registering for the newsletter

When you register on the <a href="https://www.ngi-trading.com">https://www.ngi-trading.com</a> website, we collect the personal data and information necessary to complete the registration form. This personal information includes the following contact information: *Name; Surname; Company; E-mail address, sector.* 

#### **Purposes of processing**

We inform you that the data collected with the registration of your name or that we found through the consultation of public registers, lists or documents known by anyone, will be processed in compliance with the aforementioned provisions and the confidentiality obligations that inspire the activity of **NGI Trading SA.** 

The processing carried out by **NGI Trading SA** will be based on the principles of fairness, lawfulness and transparency and protection of your privacy and your rights.

The data will be used for commercial, promotional, and advertising purposes, as well as for management and statistical purposes. We process your personal data lawfully, correctly and with the utmost confidentiality. They are recorded, organized, and stored in computer archives. The data may be communicated by us to our commercial network, to consultants in administrative/ commercial, to transporters for the delivery of goods/ illustrative material and to parent companies, and subsidiaries.

#### **Additional purposes**

The computer systems and software procedures responsible for the operation of this website acquire, during their normal operation, some personal data whose transmission is implicit in the use of internet communication protocols. This information is not collected in order to be associated with identified data subjects, but by their very nature may, through processing and association with data held by third parties, allow users to be identified.

This category of data includes the IP addresses or domain names of the computers used by users connecting to the site, the addresses in URI (Uniform Resource Identifier) notation 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 numeric code indicating the status of the response given by the server (good end, error...) and other parameters related to the operating system and the computer environment of the user.

This data is used only for the purpose of obtaining anonymous statistical information on the use of the site and to check its correct functioning and is deleted immediately after processing.

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The data may also be used to ascertain liability in the event of hypothetical computer crimes against the site.

#### **Identity of the Data Controller**

This site is managed by the Data Controller, identified in the person of the owner and Sole Administrator of the company **NGI Trading SA**, Via delle Scuole, 3B 6900 Paradiso (Switzerland).

The Data Controller guarantees the security, confidentiality, and protection it possesses at any stage of the processing process.

The collected data are processed and used in compliance with current legislation on data protection (GDPR and LPD).

#### **Place of Processing**

The data will be processed by the data controller at its operational headquarters in Via delle Scuole, 3B 6900 Paradiso (Switzerland), and by the data processors appointed by him at his offices. The list of responsible persons is available at **NGI Trading SA**.

#### **Refusal to Provide Your Data**

You, as the data owner, may refuse to provide the Data Controller with your navigation data. To do this, you must disable cookies following the instructions provided by your browser. Disabling cookies can worsen the browsing experience and reduce the functionality of the site.

#### **Recipients of Data**

No data deriving from the web service (navigation data specified above and cookies) is communicated or disseminated (without prejudice to communication to judicial or police if necessary).

The data are processed by personnel specially appointed to process the data (administrative and public relations staff also external to the Company, information systems managers also external to the Company who can also perform functions of system administrator and are then appointed as such, marketing personnel also external to the Company, interns, data processors and their collaborators, in charge of the specific sector to which a request is addressed, site managers also external to the Company) only where the processing is necessary for the performance of their duties and only carrying out the operations necessary for the performance of those tasks.

They may also be processed by data processors (including companies outside the Company that carry out shipping, marketing, and server management and storage activities). External companies may also process the data through specially appointed representatives in writing who may carry out the same activities and process the data for the same purposes, for which the managers have been appointed by **NGI Trading SA**.

The data provided by the user may be communicated to subjects for whom there is an obligation to communicate pursuant to law or a need for communication to enforce a fair right of the company to the appropriate bodies.

#### **Retention Times**

The Data are processed for the time necessary to perform the service requested by the User or required by the purposes described in this document.

The User can always and at any time ask for the interruption of the processing or even partial cancellation and/or modification of the Data.

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#### **Data Transfer**

For all the purposes indicated in this information, your Data may also be communicated abroad, inside and outside the European Union, in compliance with the rights and guarantees provided by current legislation, after verification that the country in question guarantees an "adequate" level of protection.

#### **Revocation of Consent**

With reference to art. 7 of the GDPR, the data owner may revoke consent at any time.

#### Rights of data subjects.

With reference

- art. 7 of D.Lgs. 196/2003 and art. 15 "right to access", art. 16 "right to rectification", art. 17 "right to cancellation", art. 18 "right to limitation of processing", art. 20 "right to portability", art.21 "right of opposition",
- art. 19 of the LPD and art. 25 "right of access", art. 26 "restriction of the right of access", art. 27 "Restrictions on the right of access to the media", Art. 28 "Right to receive data or to demand the transmission to third parties", "right to rectification", art. 17 "right to erasure", art. 18 "right to limitation of processing", art. 20 "right to portability", art.21 "right of opposition",

the data owner exercises his rights by writing to the Data Controller at the following address: **NGI Trading SA**, Via delle Scuole, 3B 6900 Paradiso (Switzerland) - email: info@ngi-trading.com.

#### **Lodging of a Complaint**

You have the right to lodge a complaint with the supervisory authority of your country of residence.

#### **Automated Decision Making Processes**

The Data Controller does not carry out processing that consists in automated decision-making processes.

#### Privacy policy on cookies

#### **Definition of cookies**

Cookies are small text files that are sent to your computer. This site uses the types of cookies listed below

#### 1. Technical session cookies

The use of c.d. session cookies is strictly limited to the transmission of session identifiers (consisting of random numbers generated by the server) necessary to allow safe and efficient browsing of the site.

The C.D. session cookies used on this site avoid the use of other IT techniques potentially detrimental to the confidentiality of users' browsing and do not allow the acquisition of personal data identifying the user. These cookies are processed electronically.

#### 2. Technical cookies

**NGI Trading SA** uses some technical cookies essential for the proper functioning of the website. These cookies allow you to provide the services you need and to navigate the site at its best performance. This type of cookies cannot be disabled as it is necessary for the proper functioning of the site.

#### 3. Google Analytics Cookies

This website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google").

Google Analytics uses "cookies", which are text files that are stored on your computer to allow the website to analyze how users use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to, and stored on Google's servers in the United States.

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Google (independent data controller) will use this information for the purpose of tracking and examining your use of the website, compile reports on website activities for website operators and provide other services related to website activities and internet use. Google may also transfer this information to third parties where required by law or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse to use cookies by selecting the appropriate setting on your browser, but this may prevent you from using all the features of this website.

Cookies on this site are processed electronically

#### How to disable cookies

Below is some practical information to disable cookies on major browsers.

#### Chrome

Click on the top right icon "Customize and check Google Chrome" - Click "History" - Click "Clear browsing data..." - Select the option "Cookies and other site and plug-in data" - Click "Delete navigation data."

#### Mozilla Firefox

Click "History" - Click "Clear recent history..." - Select "Cookie" option - Click "Delete now."

#### Internet Explorer

Clicca "Stumenti" - Clicca "Opzioni Internet" - Nel tab "Generale" clicca "Elimina..." - Seleziona l'opzione "Cookie" - Clicca "Elimina"

#### Safari

Click "Preferences" - Click "Privacy" - Click "Remove all website data..." and confirm.

#### How to surf anonymously without cookies

#### Google Chrome

Click on the top right icon "Customize and control Google Chrome" Click "New incognito window."

#### Mozilla Firefox

Click on the top right icon "Open menu."
Click "Anonymous window"

#### Internet Explorer

Click on "Security"
Click "inprivate Browsing."

#### – Safari

Click on "File"

Click "New Private Window".

### Information not contained in this policy

More information regarding the processing of Personal Data may be requested at any time to the Data Controller using the contact information.

#### Changes to this privacy policy

The Data Controller reserves the right to make changes to this privacy policy at any time by giving publicity to Users on this page. Please therefore consult this page often, taking as a reference the date of last change indicated at the bottom. If you do not accept the changes to this privacy policy, you must cease using this

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### **Privacy Policy and Cookies Information**

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Application and you may request the Data Controller to remove your Personal Data, unless otherwise specified.

#### Information about this privacy policy

The Data Controller is responsible for this privacy policy.

#### **Privacy of minors**

Our website is aimed at a general public and does not offer services aimed at children. If we discover that a minor has provided us with personal data without the permission of the parent or guardian, we will immediately delete such information.

#### **External links**

If pages on this website or sections of our applications contain links to other sites, they are not bound by this Privacy Policy. We recommend that you read carefully the privacy policy available on these external sites and review the procedures for the collection, use and disclosure of personal information that they use.

#### Arraignment

The User's Personal Data may be used for the defense by the Data Controller in court or in the preparatory stages to its possible establishment, from abuse in the use of the same or related services by the User.

Following subpoena, court order or other legal initiative; in order to establish or exercise the rights recognized to us by law; to defend ourselves in the event of legal action against us or for other purposes dictated by law.

The User declares to be aware that the Data Controller may be required to disclose the Data at the request of public authorities.

#### **Legal references**

This policy is drawn up in compliance with the obligations under the GDPR, the LPD, art. 10 of Directive n. 95/46/EC, as well as the provisions of Directive 2009/136/EC on Cookies.

This privacy policy applies only to this website.

Paradiso, 30 October 2023



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