



UMBRA GROUP

Let's move
motion
technology
together

PRIVACY NOTICE
pursuant to Article 13 of Regulation (EU)
2016/679 ("GDPR")

1. DATA CONTROLLER AND CONTACT DETAILS

The Data Controller is UMBRAGROUP S.p.A., with registered office at Via V. Baldaccini, 1 – Z.I. Loc. Paciana, Foligno (PG), Italy, represented by its current legal representative (the “Data Controller” or “UMBRA”).

For any request regarding the protection of personal data (including the exercise of the rights referred to in Section 9), UMBRAGROUP may be contacted at the following address e-mail: privacy@umbragroup.com

2. CATEGORIES OF PERSONAL DATA PROCESSED

Through the online forms available on the website (e.g. documentation download forms, contact forms, and newsletter subscription forms), UMBRAGROUP collects the following categories of personal data:

- personal and contact details (first name, last name, company, job title/role, e-mail address, phone number);
- company/organization-related data (company name, business sector, country, VAT number where applicable);
- information related to the request (type of documentation downloaded, area of interest, free-text message entered in the form);
- browsing and technical data collected through cookies and other tracking tools, as described in the website’s Cookie Policy.
- As a rule, UMBRAGROUP does not request, through these forms, personal data belonging to special categories (e.g. data relating to health, political opinions, religious beliefs, etc.); users are therefore invited **not to enter such information** in free-text fields.

3. PURPOSES OF PROCESSING, LEGAL BASES AND DATA RETENTION PERIODS

Personal data collected through the website forms are processed within the company CRM system for the following purposes:

3.1 Management of requests and downloads Purposes:

- to manage information requests submitted through the website (e.g. commercial or technical inquiries);
- to allow the download of technical and commercial documentation (e.g. brochures, catalogs, white papers);
- to respond to requests and maintain operational contact with the user/company;
- to track interactions within the CRM in order to ensure appropriate commercial/technical follow-up.

Legal basis:

- performance of pre-contractual measures taken at the request of the data subject and/or performance of a contract to which the data subject is a party.

UMBRA GROUP S.p.A.

Via V. Baldaccini, 1
06034 Foligno (PG) – Italy
Tel. +39 07423481
info@umbragroup.com
umbragroup.com

Capitale Sociale €12.055.987,94 i.v.
Iscr. Reg. Imprese Perugia 02016930543
C.C.I.A.A. Perugia n° 174039
Codice Fiscale e Partita IVA 02016930543
Partita IVA comunitaria IT 02016930543





UMBRA GROUP

Let's move
motion
technology
together

Retention period: For this purpose, data will be retained for the time strictly necessary to properly manage the request or the pre-contractual/contractual relationship and, in any case, for no longer than [36 months] from the last active contact with the user (e.g. last request, last download, last documented interaction), unless longer retention is required by law or necessary to protect the Data Controller's rights in judicial proceedings.

3.2 Soft marketing based on legitimate interest

Purposes:

- to send, to the e-mail address provided by the user in the context of the request or download, "soft marketing" communications relating to UMBRAGROUP products and/or services similar to those that were the subject of the request or downloaded documentation (e.g. updates on related technical solutions, invitations to webinars or technical events, B2B newsletters focused on related products/services);
- to measure, in an aggregated manner, the effectiveness of such communications (e.g. open/click rates), in compliance with the data minimization principle.

Legal basis:

- UMBRAGROUP's legitimate interest in maintaining a commercial/professional relationship with its users/business contacts and in promoting products or services similar to those already requested or downloaded, in compliance with Italian regulations on electronic communications and with the data subject's right to object at any time.

Methods and limitations:

- soft marketing communications will be sent exclusively by e-mail to the address provided in the context of the request or download;
- they will relate solely to products/services that are similar or strictly related to those for which the user has expressed interest;
- each communication will always include a simple and free mechanism to exercise the right to object (opt-out), with immediate or prompt effect;
- the user may also object at any time by contacting the Data Controller using the contact details set out in Section 1.

Retention period: For soft marketing purposes, data will be processed for a maximum period of [36 months] from the last significant interaction with UMBRAGROUP (e.g. opening a communication, participation in an event, new request or download), unless the data subject objects earlier. After this period, data will be deleted or anonymized for statistical purposes.

3.3 Additional marketing based on consent

Purposes:

- to send promotional and marketing communications beyond soft marketing, including general communications not necessarily limited to products/services similar to those requested or downloaded;
- to send periodic newsletters, invitations to events and trade fairs, satisfaction surveys, and broader promotional initiatives;
- where applicable and clearly indicated, to carry out basic profiling activities to segment B2B customers based on sector, role, geographic area, or expressed interest, in order to personalize communications.

Legal basis:

- the data subject's explicit, free and specific consent, collected through a dedicated checkbox.

UMBRA GROUP S.p.A.

Via V. Baldaccini, 1
06034 Foligno (PG) – Italy
Tel. +39 07423481
info@umbragroup.com
umbragroup.com

Capitale Sociale €12.055.987,94 i.v.
Iscr. Reg. Imprese Perugia 02016930543
C.C.I.A.A. Perugia n° 174039
Codice Fiscale e Partita IVA 02016930543
Partita IVA comunitaria IT 02016930543





UMBRA GROUP

Let's move
motion
technology
together

Voluntary nature of data provision:

- providing data for additional marketing purposes is entirely optional. Failure to provide such data or to give consent does not in any way affect the ability to download the requested documentation or to receive responses to information requests.

Retention period: For additional marketing purposes, data will be processed until consent is withdrawn by the data subject and, in any case, no longer than [36 months] from the date consent is given or last renewed/updated, unless earlier deletion or revocation is requested.

For all the purposes described in this section, it is understood that, in the event of out-of-court or judicial disputes with the data subject and/or third parties, the data will be processed for the entire duration of the dispute and, in any case, for as long as necessary for the Data Controller to fully exercise and protect its rights.

4. DATA PROVISION

Providing the data marked as mandatory in the online forms is necessary and essential in order to receive responses to requests and to download documentation; failure to provide such data will prevent UMBRAGROUP from delivering the requested services. Providing data requested in non-mandatory fields is entirely optional and failure to provide such data will not prevent access to the requested services.

Data processing for soft marketing purposes is based on the use of the e-mail address provided in the context of the request/download; the data subject may object at any time.

Providing data for additional marketing purposes and any related profiling activities is optional and subject to consent; failure to give consent has no consequences on access to the requested informational services.

5. METHODS OF PROCESSING AND USE OF THE CRM

Data are processed using electronic tools and, in part, paper-based tools, according to procedures strictly related to the purposes indicated and in compliance with the principles of integrity, confidentiality, and data minimization.

Data collected through the forms are entered into the company CRM system, where they are organized and updated in order to:

- manage requests and pre-contractual/contractual relationships;
- record interactions with users/companies;
- manage soft marketing communications and, where consent has been given, additional marketing activities.

UMBRA GROUP adopts appropriate technical and organizational measures to ensure the security of personal data and to prevent unauthorized or unlawful processing, as well as accidental loss, destruction, or damage.

6. DATA RECIPIENTS AND TRANSFERS TO THIRD COUNTRIES

Personal data may be processed by authorized UMBRAGROUP personnel (e.g. marketing, sales, technical, IT functions) who have been appropriately instructed and formally appointed.

Data may be disclosed to third parties providing services to the Data Controller, such as:

UMBRA GROUP S.p.A.

Via V. Baldaccini, 1
06034 Foligno (PG) – Italy
Tel. +39 07423481
info@umbragroup.com
umbragroup.com

Capitale Sociale €12.055.987,94 i.v.
Iscr. Reg. Imprese Perugia 02016930543
C.C.I.A.A. Perugia n° 174039
Codice Fiscale e Partita IVA 02016930543
Partita IVA comunitaria IT 02016930543





UMBRA GROUP

Let's move
motion
technology
together

- IT service providers and website/CRM maintenance providers;
- e-mail marketing and newsletter management service providers;
- consultants and professionals assisting UMBRAGROUP for administrative, legal, or compliance purposes.

Where required, such parties will act as data processors pursuant to Article 28 GDPR, on the basis of specific agreements providing adequate safeguards for the protection of personal data.

The Data Controller may also disclose data, in addition to parties to whom disclosure is required by law, to other Group companies located within the European Union, whether subsidiaries or affiliates.

If data are transferred to third countries (outside the EU/EEA), such transfers will take place in compliance with Chapter V of the GDPR, adopting the appropriate safeguards (e.g. adequacy decisions, standard contractual clauses), which will be clearly indicated in the extended privacy notice or provided upon request by the data subject.

7. COOKIES AND TRACKING TOOLS

The website uses technical cookies and, subject to consent, profiling cookies and other tracking tools. For further information on the types of cookies used, their purposes, how to manage preferences, and retention periods, please refer to the website's Cookie Policy.

Consent is not required for technical cookies, but an information notice is always provided. For profiling cookies, a free, informed, specific, and revocable consent is required, collected through a dedicated banner and preference management panel.

8. DATA SUBJECTS' RIGHTS

During the period in which UMBRAGROUP holds or processes personal data, the data subject may, at any time, exercise the following rights:

- Right of access: the right to obtain confirmation as to whether or not personal data are being processed and to receive information relating to such processing;
- Right to rectification: the right to obtain correction of inaccurate or incomplete data;
- Right to erasure: where applicable, the right to obtain deletion of personal data held by UMBRAGROUP;
- Right to restriction of processing: under certain conditions, the right to obtain restriction of processing;
- Right to data portability: the right to obtain the transfer of personal data to another data controller;
- Right to object: the right to object to the processing of personal data, in particular processing based on legitimate interest, including soft marketing;
- Right to lodge a complaint with a supervisory authority: if UMBRAGROUP refuses to satisfy an access request, the reasons for such refusal will be provided. Where applicable, the data subject has the right to lodge a complaint as described below;
- Right to withdraw consent: without affecting the lawfulness of processing carried out prior to withdrawal.

UMBRA GROUP S.p.A.

Via V. Baldaccini, 1
06034 Foligno (PG) – Italy
Tel. +39 07423481
info@umbragroup.com
umbragroup.com

Capitale Sociale €12.055.987,94 i.v.
Iscr. Reg. Imprese Perugia 02016930543
C.C.I.A.A. Perugia n° 174039
Codice Fiscale e Partita IVA 02016930543
Partita IVA comunitaria IT 02016930543





UMBRA GROUP

Let's move
motion
technology
together

To exercise these rights, the data subject may contact UMBRAGROUP using the contact details provided in Section 1, specifying the subject of the request and providing the information necessary for identification.

9. RIGHT TO OBJECT TO SOFT MARKETING AND WITHDRAWAL OF CONSENT FOR ADDITIONAL MARKETING

The data subject has the right to object at any time to the processing of personal data for soft marketing purposes based on legitimate interest, in whole or in part (e.g. limited to specific types of communications or channels).

The objection may be exercised by sending a request to the contact details provided in Section 1. In the event of an objection, UMBRAGROUP will promptly cease sending soft marketing communications to the relevant e-mail address.

With regard to additional marketing activities based on consent, the data subject has the right to withdraw consent at any time, using the same methods indicated above. Withdrawal of consent does not affect the lawfulness of processing carried out prior to withdrawal.

10. COMPLAINTS

If you wish to lodge a complaint regarding the way in which your personal data are processed by UMBRAGROUP, or regarding the handling of a complaint, you have the right to submit a complaint directly to the competent Supervisory Authority, in accordance with the procedures set out on the website <https://www.garanteprivacy.it>, or to seek judicial remedies before the competent courts.

UMBRA GROUP S.p.A.

Via V. Baldaccini, 1
06034 Foligno (PG) – Italy
Tel. +39 07423481
info@umbragroup.com
umbragroup.com

Capitale Sociale €12.055.987,94 i.v.
Iscr. Reg. Imprese Perugia 02016930543
C.C.I.A.A. Perugia n° 174039
Codice Fiscale e Partita IVA 02016930543
Partita IVA comunitaria IT 02016930543

