Privacy Policy for Website Users

(pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 – "GDPR")

Refink S.r.l.
Società soggetta ad attività di direzione e coordinamento di Refink Holding s.r.l.
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P.IVA/C.F. 09233650960 – Iscritta al numero MI - 2077347 del R.E.A.
Società di Revisione iscritta nel Registro dei Revisori Legali al n.189240
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I Privacy Policy for Website Users

This Privacy Policy describes the methods for processing the personal data of users (the "Data Subjects") who browse the Company's website (the "Website"). It is provided pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 (the "GDPR") and the applicable national legislation on personal data protection.
Refink S.r.l. (the "Company" or "Refink") is committed to protecting users' privacy and to processing personal data in a lawful, fair, and transparent manner, adopting appropriate technical and organisational measures to ensure data security and confidentiality.
This Privacy Policy is intended to provide information on:

- the ownership of personal data processing activities;
- the contact details for requests or clarifications;
- the nature of the personal data processed while browsing the Website;
- the purposes and legal bases of the processing;
- the data protection measures and data retention periods;
- the procedures for exercising the rights granted to Data Subjects.

This Privacy Policy applies exclusively to the Company's institutional Website, accessible at **https://refink.eu**, and does not extend to any other websites that may be accessed through external links. The Company is not responsible for the content or privacy policies of third-party websites.
Data Controller
The Data Controller is Refink S.r.l. tax and VAT No. 09233650960,
with registered office in Milan, Piazza Giuseppe Missori, 2 – 20122
Telephone: +39 02.36.63.92.21 (the "Data Controller").
The processing of personal data is carried out by the Data Controller's internal staff, duly authorised, as well as by external parties appointed as Data Processors pursuant to Article 28 of the GDPR, on the basis of specific agreements.
The Data Controller acknowledges the importance of protecting the personal data of its customers, prospective customers, collaborators, and Website users, and undertakes to ensure full compliance with the applicable data protection legislation.
Contacts and Data Protection Officer (DPO)
The Data Controller has appointed a Data Protection Officer ("DPO").
Data Subjects may contact the Data Controller or the DPO for any information relating to the processing of personal data or to exercise their rights under the GDPR, using one of the following contact details:

- Telephone: +39 342 52 14 368
- E-mail: dpo@refink.eu
- Certified e-mail (PEC): refink@legalmail.it
- Postal mail or registered letter: Refink S.r.l., Piazza Giuseppe Missori, 2 – Milan 20122.

Personal Data Processed

The Data Controller processes users' personal data in connection with browsing the Website and the use of the contact forms that may be made available over time, depending on specific informational or operational needs.
Such contact forms may relate, by way of example, to:

- general contact requests or relating to specific subject areas;
- requests for the transmission of documentation or informational materials;
- subscription to informational or update services, including those complementary to; services already provided to Refink's clients.

In the context of the above activities, the Data Controller may process personal data such as:

- first and last name;
- contact details (e-mail address, telephone number);
- professional information (job title, company or organisation of affiliation);
- any additional information voluntarily provided by the user, such as "notes", including information contained in documents transmitted to the Data Controller.

For the proper functioning of the Website and in order to improve the browsing experience, the Data Controller uses cookies and similar tools, which may involve the processing of technical personal data.
Such data are processed exclusively for the purpose of optimising navigation and for the preparation of aggregated and anonymised statistical analyses relating to Website traffic and the regional geographic origin of users.
In this context, the following data may be processed:

- IP address;
- type and version of browser;
- language used;
- date, time, and access methods to the Website.

Technical data are not used for individual profiling purposes nor for automated decision-making processes. Detailed information on the types of cookies used and on the methods for managing user preferences is available in the Cookie Policy, accessible via the dedicated link (https://www.iubenda.com/privacy-policy/56016308/cookie-policy).
The Data Controller does not process, through the Website, special categories of personal data pursuant to Article 9 of the GDPR, nor personal data relating to underage.
Purposes of Processing and Legal Bases
The personal data of users are processed by the Data Controller for the following purposes:

a) Management of requests and information services

To respond to requests submitted via the contact forms, to provide information, documentation or requested materials, and to manage information or update services, including those complementary to services already provided to clients.

Legal basis:

- the performance of pre-contractual measures taken at the request of the Data Subject or the performance of a contract to which the Data Subject is a party (Article 6(1)(b) GDPR).

b) Website operation and navigation

To enable the proper operation of the Website, to ensure its security, and to improve the user experience, including through aggregated and anonymised statistical analysis of Website traffic.

Legal basis:

- the legitimate interest of the Data Controller in the proper functioning of the Website (Article 6(1)(f) GDPR).

c) Compliance with legal obligations and protection of rights

To comply with obligations arising from laws, regulations, or applicable legislation, as well as to respond to requests from competent authorities. Personal data may also be processed for the establishment, exercise, or defence of the Data Controller's rights in judicial, administrative, or out-of-court proceedings.

Legal basis:

- compliance with a legal obligation to which the Data Controller is subject (Article 6(1)(c) GDPR);

- the legitimate interest of the Data Controller in the protection of its rights (Article 6(1)(f) GDPR).

Mandatory or Optional Provision of Personal Data
The provision of personal data for the purposes referred to in points (a), (b), and (c) above is necessary in order to manage user requests, enable Website navigation, and comply with applicable legal obligations.
Failure to provide such data may result in the inability of the Data Controller to provide the requested services or to respond to user requests.
The provision of technical data through cookies, within the limits described in this Privacy Policy and in the Cookie Policy, does not affect the use of the essential Website services and may be managed by users in accordance with the procedures set out in the Cookie Policy.

Data Protection Measures and Data Retention Periods

Data Protection Measures

Personal data are processed by the Data Controller in accordance with the principles of lawfulness, fairness, transparency, and data minimisation set out in the GDPR, through the adoption of appropriate technical and organisational measures designed to ensure a level of security appropriate to the risks associated with the processing.
Personal data are processed using manual and electronic tools, with processing logic strictly related to the purposes described in this Privacy Policy, and with the implementation of appropriate measures aimed at preventing unauthorised access, disclosure, alteration, or destruction of data.
In particular, the Data Controller adopts, inter alia:

- organisational measures to ensure that personnel authorised to process personal data are adequately trained and instructed on personal data protection matters;
- administrative and technical controls designed to restrict access to personal data to persons who require such access in relation to the purposes of the processing;
- IT security measures, including systems for the protection of networks and IT tools;
- physical and logical security measures to protect the environments and systems used for data processing.

Information systems and software programmes are configured to minimise the use of personal data, favouring, where possible, anonymous or aggregated data.

Data Retention Periods

Personal data are retained for a period of time no longer than is necessary to achieve the purposes for which they were collected, in compliance with the principles of storage limitation and data minimisation.

In particular:

- personal data processed for Website navigation and operation purposes are retained for the time strictly necessary to ensure such functionalities, as specified in the Cookie Policy;
- personal data processed for the management of requests and information services are retained for the time required to handle user requests and, thereafter, for a period deemed appropriate in relation to the purposes pursued;
- personal data processed to comply with legal obligations or to protect the Data Controller's rights are retained for the period required by applicable legislation or for the time necessary to manage any disputes or audits.

Once the applicable retention period has expired, personal data are deleted or anonymised, subject to technical and regulatory constraints.

Data Subjects' rights and how to exercise them

Pursuant to the GDPR, the Data Subject has the right to obtain from the Data Controller the recognition and exercise of the rights provided for by the GDPR, within the limits and in accordance with the procedures set out therein. In particular, the Data Subject has the right to:

1. **Right of access:** to obtain confirmation as to whether or not personal data concerning them are being processed and, where that is the case, access to such personal data and to information on the processing activities.
2. **Right to rectification:** to obtain the rectification of inaccurate personal data concerning them or the completion of incomplete personal data.
3. **Right to erasure ("right to be forgotten"):** to obtain the erasure of personal data concerning them in the cases provided for by the GDPR.
4. **Right to restriction of processing:** to obtain the restriction of processing in the cases provided for by the GDPR (e.g. where the accuracy of the data is contested).
5. **Right to data portability:** to receive personal data concerning them in a structured, commonly used, and machine-readable format and, where technically feasible, to transmit such data directly to another data controller.

6. **Right to object:** to object, at any time, on grounds relating to their particular situation, to the processing of personal data concerning them, in the cases provided for by the GDPR.

7. **Right to withdraw consent:** where processing is based on consent, to withdraw such consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

The exercise of the above rights may be carried out by submitting a request to the Data Controller or to the Data Protection Officer (DPO), using the contact details provided in this Privacy Policy.
The Data Controller shall provide a response without undue delay and, in any event, within the time limits laid down by the GDPR. Where a request is manifestly unfounded or excessive, the Data Controller may charge a reasonable fee or refuse to act on the request, providing appropriate justification.
Without prejudice to any other administrative or judicial remedy, the Data Subject also has the right to lodge a complaint with the competent Supervisory Authority if they consider that the processing of personal data relating to them infringes the applicable data protection legislation, using the following contact details:

- official communications: **protocollo@gpdp.it**
- Public Relations Office (URP): **urp@gpdp.it**
- certified e-mail (PEC): **protocollo@pec.gpdp.it**.

Last updated January 9, 2026