



Re: Personal data privacy notice, pursuant to art. 13, EU Regulation no. 2016/679 – the “GENERAL DATA PROTECTION REGULATION” (hereinafter the “GDPR”) and Leg. Dec. 196/2003, as supplemented by Leg. Dec. 101/2018.

This Privacy Notice is to inform you of the methods used by ITW TEST AND MEASUREMENT ITALIA S.R.L. (hereinafter, the “Company”) to process the data we collect from you upon your entry to our premises. This information is also available on our website, in the privacy area. Where not otherwise specified, all articles quoted refer to the Regulation indicated in the title.

1) Data Controller

The Data Controller is the Company ITW TEST AND MEASUREMENT ITALIA S.R.L., with registered offices and operational headquarters in Via Airauda, 12 Pianezza (10044 - TO), VAT no. IT00468990015.

2) Appointment of DPO (Data Protection Officer)

The Data Controller, not falling under the cases listed in Art. 37 of the GDPR, nor those indicated in the various interpretations of the Italian Data Protection Authority, is not required to appoint a Data Protection Officer.

3) Subject of the processing

The processing concerns:

1. identification and contact data (for example name, last name, company name, address, telephone number, e-mail, identity document, signature), hereinafter, “personal data”, provided by you during your visit to the premises of the Data Controller. In the event of access to the Company perimeter with a vehicle to load or unload goods, the only data we require is your Company ID card.
2. Any other data necessary for managing visas and permits, in the event you arrive from abroad and the Company has to manage box office and consulate procedures.

4) Purpose, lawful basis for processing and provision of personal data.

The purposes of the processing referred to in paragraph 3.1 are to protect company assets and meet the need to trace personnel within the company perimeter, for security reasons. The processing is lawful pursuant to Art. 6, subsection 1), letters c), d) and f). The provision of the data is mandatory, under penalty of the impossibility to enter the company perimeter.

The purpose of the processing referred to in paragraph 3.2 is to manage travel operations from your country to Italy, in legal and formal terms. The processing is mandatory, with lawful basis in Art. 6, subsection 1, letter c) of the GDPR (legal obligation). Your consent is not required.

5) Method of processing, duration of processing

The personal data provided is subject to the operations indicated in Art. 4, n. 2) of the GDPR, and specifically: collection, registration, storage, communication, deletion and destruction. Personal data collected under paragraphs 3.1 and 3.2 may be processed manually and by automated means.

All data collected from you regarding the processing referred to in paragraph 3.1 shall be kept for five years. In the event of access to the Company perimeter with a vehicle to load or unload goods, the data referred to in paragraph 3.1 is not collected or stored.

6) Access to the data

The data provided under paragraphs 3.1 and 3.2 may be made available for the purposes referred to in para. 4) to employees and collaborators of the Data Controller, in their capacity as data processors and/or system administrators, or to third party companies or other entities (by way of example, credit institutions, professional studios, consultants, insurance companies for the provision of insurance services, etc.) that conduct certain operations on behalf of the Data Controller on an outsourcing basis, in their capacity as external data processors.

7) Communication of the data



Without the need for explicit consent (pursuant to Art. 6 lett. b), c) of the GDPR), the Data Controller may communicate your data for the purposes referred to in para. 4) to Supervisory boards, Judicial authorities, insurance companies for the provision of insurance services, to the parent company ITW Inc. and companies of the ITW Ltd. Group, as well as to entities to which communication is mandated by law for said purposes. Such entities shall process the data in their capacity as independent data controllers. Your data will not be distributed.

8) Data transfer outside the EU

Personal data provided under para 3.1. and 3.2 will be stored in electronic and/or hard copy format on servers and/or physical archives located at the offices of the Data Controller, within the European Union, and at data centres belonging the parent company ITW Inc. in the United States of America, and at companies of the ITW Ltd. Group in the United Kingdom. It is hereby understood that the Data Controller, if necessary, shall have the faculty to move said archives and servers to other EU or non-EU states, for the use of Cloud services for example, or in the event certain data must be transferred to the ITW parent company in Glenview, Illinois, USA. In such an event the Data Controller hereby ensures that the transfer of data outside the EU shall take place in compliance with the applicable provisions of law, upon stipulation of the standard contractual clauses established by the European Commission.

9) Rights of the Data Subject

As data subject, you have the rights referred to in articles 15, 16, 17, 18, 19, 20, 21 and 22 of the GDPR. In detail

- Right of access
- Right to rectification
- Right to erasure ('right to be forgotten')
- Right to restriction of processing
- Right to mandatory notification in the event of rectification or erasure of personal data or restriction of processing
- Right to data portability
- Right to object
- Rights related to Automated decision making, including profiling.

10) Methods for the exercise of data subject rights

You may exercise your rights at any time by sending:

- a registered letter addressed to the Data Controller, referred to in paragraph 1)
- an e-mail to privacy@instron.com

ITW TEST AND MEASUREMENT ITALIA S.R.L.
Pianezza (TO)