

Privacy and Cookie Policy

FinGreenTech SRL – Benefit Company | www.fingreentech.com

Updated Version – April 2026

1. Data Controller

The Data Controller for personal data collected through the website

FinGreenTech SRL – Benefit Company

Registered office: Via Rovereto 7 – 00198 Rome (RM)

P.IVA e C.F.: 16172421006

Email: info@fingreentech.com | Email privacy: privacy@fingreentech.com | PEC: info@pec.fingreentech.it | Web: www.fingreentech.com

FinGreenTech SRL SB is certified ISO 9001, ISO 14001, ISO 20000, ISO 22301, ISO 27001, ISO 27017 and ISO 27018, and holds the ACN QC2 qualification as a certified cloud provider for the Public Administration. Data processing is carried out in full compliance with these standards and with Regulation (EU) 2016/679 (GDPR).

2. Data Protection Officer (DPO)

Pursuant to Article 37 of the GDPR, the Data Controller has appointed a Data Protection Officer:

Dr. Francesco Gandolfi

Email DPO: dpo@fingreentech.com

For any enquiries regarding data processing or the exercise of your rights, users may contact the DPO at the address above..

3. Types of Data Collected

3.1 Website Browsing

The website does not include restricted areas or active profiling systems. A contact form is available to collect user enquiries, through which personal data may be submitted.

During browsing, computer systems automatically acquire certain technical data implicit in the use of Internet protocols:

- IP address (for security purposes only, not cross-referenced with other data)
- Browser type and operating system
- Date and time of the request
- Referring page (referral)

Such data are collected and processed in exclusively aggregate and anonymous form, for statistical and security purposes.

3.2 Voluntarily Provided Data

The website makes contact forms available through which users may enter personal data such as name, email address and message content.

The provision of data is optional but necessary in order to respond to user enquiries.

The data provided are used exclusively for the management of enquiries and for any pre-contractual activities. Data will not be used for marketing purposes without explicit consent.

4. Legal Basis for Processing

Processing is based on the following legal grounds pursuant to Article 6 GDPR:

- Consent of the data subject (Art. 6(1)(a)): for commercial communications and non-technical cookies. For requests submitted via the contact form, the legal basis is the implementation of pre-contractual measures requested by the data subject.
 - Contractual performance or pre-contractual measures (Art. 6(1)(b)): for the management of enquiries;
 - Compliance with legal obligations (Art. 6(1)(c)): for tax, accounting and regulatory obligations;
 - Legitimate interest of the Controller (Art. 6(1)(f)): for website security and abuse prevention.
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5. Purposes of Processing

- Statistics and analysis: aggregate and anonymous data collection to monitor website performance;
 - Security: protection against cyberattacks, spam and unauthorised access;
 - Management of enquiries: responding to communications received via contact form, chat, email or other channels, including the handling of commercial and pre-contractual information requests;
 - Legal and tax compliance: retention of data required by applicable regulations;
 - Pre-sales and consulting activities: where the user requests commercial information.
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6. Third-Party Tools and Services

Third-party service providers used by the website (e.g. hosting, analytics, cookie management and live chat services) process personal data on behalf of the Controller and act as Data Processors pursuant to Article 28 of the GDPR.

The relationship with such providers is governed by specific Data Processing Agreements (DPAs), which define the Controller's instructions and the technical and organisational measures adopted to protect personal data.

6.1 Iubenda – Privacy and Consent Management

The website uses Iubenda for the management of the privacy policy, cookie policy and consent banner. For more information: <https://www.iubenda.com/en/privacy-policy>.

6.2 Tidio – Chat Service

The website integrates the Tidio live chat service (Tidio Ltd.), which may collect personal data such as name, email address and message content.

Processing is aimed at managing user enquiries and is based on the legitimate interest of the Controller.

For more information: <https://www.tidio.com/privacy-policy/>

6.3 Google Analytics

The website uses Google Analytics (Google Ireland Ltd) for statistical analysis of traffic in aggregate and anonymised form (IP anonymisation enabled). Users may opt out via:

<https://tools.google.com/dlpage/gaoptout>.

Google Analytics may involve the transfer of data to non-EU countries (in particular the United States), on the basis of Standard Contractual Clauses (SCCs) adopted pursuant to Articles 44 et seq. of the GDPR

6.4 YouTube and Social Plugins

YouTube videos are embedded using enhanced privacy mode (no-cookie), which limits the installation of cookies until the user interacts with the content.

Social buttons (LinkedIn, Facebook, Instagram) activate cookies only upon voluntary interaction by the user.

7. Cookie Policy

7.1 Categories of Cookies Used

- Technical cookies (strictly necessary): required for the operation of the website. No consent required.
- Analytical cookies: used subject to the user's consent via the preference management banner (lubenda).
- Profiling and marketing cookies: set by third parties for behavioural advertising. Explicit consent required.
- Functional cookies: enhance the browsing experience (language, preferences).

7.2 Management and Disabling

Users may manage their cookie preferences via the lubenda banner on the website or through browser settings. Instructions for major browsers:

- Mozilla Firefox: <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>
- Google Chrome: <https://support.google.com/chrome/answer/95647>
- Microsoft Edge: <https://support.microsoft.com/en-us/microsoft-edge>
- Apple Safari: <https://support.apple.com/en-us/guide/safari/sfri11471>

8. Location of Processing and Extra-EU Transfers

Data are processed at the Controller's operational premises and at FinGreenTech SRL SB's certified data centres (Pisa – Vianova and Rome – Retelit/CONSIG). Some data may be transferred to non-EU countries (e.g. USA for Google Analytics and YouTube), with adequate safeguards pursuant to Articles 44–49 GDPR.

9. Retention Period

- Security logs (IP): 30 days, then deleted or anonymised;
 - Analytical data (Google Analytics): in aggregate form for 24 months;
 - Voluntarily provided data: up to 24 months from the conclusion of the relationship;
 - Data for legal and tax compliance: periods provided by applicable regulations (generally 10 years).
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10. Rights of the Data Subject

Pursuant to Articles 15–22 GDPR, users have the right to:

- **Access** their personal data (Art. 15) and obtain a copy;
 - **Rectification** of inaccurate or incomplete data (Art. 16);
 - **Erasure** ("right to be forgotten") where applicable (Art. 17);
 - **Restriction** of processing in certain cases (Art. 18);
 - **Portability**: receive data in a structured, machine-readable format (Art. 20);
 - **Object** to processing based on legitimate interest or for marketing purposes (Art. 21);
 - **Withdraw consent** at any time, without retroactive effect;
 - **Lodge a complaint** with the Italian Data Protection Authority (www.garanteprivacy.it).
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To exercise your rights: privacy@fingreentech.com | DPO: dpo@fingreentech.com. Requests are processed free of charge within 30 days (extendable by 60 days).

11. Security Measures

FinGreenTech SRL SB adopts appropriate technical and organisational measures, in line with its certified standards (ISO 27001, ISO 27017, ISO 27018):

- Website-to-browser communications encrypted via HTTPS (SSL/TLS);
 - Infrastructure protected by firewalls, intrusion detection systems and encryption;
 - Data access restricted to authorised personnel bound by confidentiality obligations;
 - Incident management and business continuity procedures pursuant to ISO 22301 and the NIS2 Directive.
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12. Amendments to This Policy

The Controller reserves the right to update this policy by publishing changes on this page with an updated date. Users are encouraged to consult this page periodically.

13. Code of Conduct and Regulatory References

The Controller is committed to respecting the principles and best practices set out in applicable codes of conduct and industry standards relating to personal data protection, information security and digital services.

- Regulation (EU) 2016/679 – GDPR
- Legislative Decree No. 196 of 30 June 2003 – Privacy Code (as amended by Legislative Decree No. 101/2018)
- Italian Data Protection Authority measure on cookies – 10 June 2021
- NIS2 Directive (EU) 2022/2555, transposed in Italy by Legislative Decree No. 138/2024

Last updated: April 2026

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The Controller maintains a Record of Processing Activities pursuant to Article 30 of the GDPR, kept up to date and in compliance with applicable regulations.