



C.M.Trading S.r.l.
Via dei Prati Fiscali, 201 00141 Roma
P. Iva IT04077341008
Reg. Imprese RM n. 04077341008
Cap. Sociale € 200.000,00 i.v.



ISO 9001
ISO 27001
BUREAU VERITAS
Certification



Privacy and Cookie Policy

C.M.Trading srl Via dei prati fiscali 201 - 00141 Roma P. Iva IT04077341008 - R.E.A. n.04077341008, Data Controller, in the person of the legal representative pro-tempore, provides below information on the processing of personal data collected through this website or in the context of service provision, thus constituting a notice to data subjects pursuant to Art. 13 of EU Regulation 2016/679.

The Controller places the utmost importance on the right to privacy and the protection of personal data of its Users. For any information regarding this privacy policy, Users may contact C.M.Trading srl at any time using the contact details provided below.

Use by Minors

The Service is not intended for persons under the age of 16; C.M.Trading srl requests that such persons do not provide personal information through the Service. If your child has submitted personal information and you wish to request its removal, you may contact the Controller as indicated below. In any case, the Controller will immediately proceed with the deletion of such data upon becoming aware of it.

The Data Controller

The Data Controller is C.M.Trading Srl, Via dei prati fiscali 201 - 00141 Roma, in the person of the legal representative pro-tempore.

For any information regarding the processing of data related to this site, please contact:
marketing@gruppocmt.eu

Data Subject to Processing

The following categories of data may be subject to processing:

Data voluntarily provided by the user

This refers to personal data (e.g. personal details, address, email) freely provided by the user to access certain services offered by the site (e.g. registration to the reserved area, contact requests, requests for informational and promotional materials, etc.) or otherwise provided through communications (email, phone) to our contacts, or acquired by the Controller during meetings or contacts of a commercial nature and in the context of relationship development.

The provision of services entails the acquisition by the Controller of the sender's email address and/or other personal data, which will be processed to respond to the request or deliver services. Failure to provide the data, or the relevant consent where required, may result in the impossibility of obtaining the requested service.

Where required and necessary, specific notices and consent requests may appear on the pages of the Site dedicated to specific services.

Navigation data

The computer systems and software procedures used to operate the Site collect, in the course of their normal operation, certain personal data (such as IP addresses or domain names of the computers used by users, pages visited and the date/time of the visit), the transmission of which is implicit in the use of Internet communication protocols. This information is not collected to be associated with identified individuals, but by its very nature could, through processing and association with data held by third parties, allow users to be identified. This data is used solely for the purpose of obtaining anonymous statistical



information on the use of the Site and to monitor its correct functioning. The data may be used to establish liability in the event of hypothetical cybercrimes against the Site.

Cookies

In order to make browsing on this Site more efficient and immediate, cookies are used when users access this website: small text strings that allow the connection to the Site to be maintained.

For more information, please see our Cookie Policy.

Purposes and Methods of Processing

The table below details the purposes and legal basis for processing:

PURPOSE OF PERSONAL DATA PROCESSING	LEGAL BASIS
Management, correct functioning, use and consultation of the site [Common Data]	Legitimate interest of the Controller [art. 6.1f]. Retention: up to 3 years from the browsing session.
Registration to the reserved area	Performance of pre-contractual measures adopted also at the request of the data subject [art. 6.1b]. Retention: duration of the contract.
Management of the commercial/pre-contractual relationship for the provision of services	Performance of pre-contractual measures adopted also at the request of the data subject [art. 6.1b]. Retention: time to finalise the contract / duration of the contract.
Management of contact/demo requests [Common Data]	Consent of the data subject [art. 6.1a]. Retention: withdrawal of consent – max. 3 years.
Submission of applications for job positions	Performance of pre-contractual measures at the request of the data subject (art. 6, para. 1, lett. b) and pursuant to art. 111-bis of Legislative Decree 196/03. Performance of specific tasks provided for by legislation on labour law and social security (art. 9.2 lett. b). Retention: 12 months.
Marketing activities and sending communications on products and services	Consent of the data subject [art. 6.1a]. Retention: withdrawal of consent – max. 3 years.
Registration/Participation in Events	Performance of pre-contractual measures adopted also at the request of the data subject [art. 6.1b]. Retention: 12 months.
Access to documents/informational content	Consent of the data subject [art. 6.1a]. Retention: withdrawal of consent – max. 3 years.
Compliance with specific obligations provided for by law or other binding regulations	Fulfilment of legal obligations [art. 6.1c]. Retention: in accordance with applicable legal requirements.

The processing of personal information concerning you will be based on the principles of fairness, lawfulness and transparency, and on the protection of your privacy and your rights.



Your data is collected and stored both in computerised databases (corporate CRM) and in paper archives, with logic strictly related to the purposes themselves, on the basis of the data held by the Controller and with your commitment to promptly communicate any corrections, additions and/or updates.

Processing will be carried out in compliance with and by applying appropriate security measures to safeguard the confidentiality, integrity and completeness of the data processed, in accordance with Article 32 of the GDPR and with the instructions issued by the Data Controller.

RECIPIENTS OR CATEGORIES OF RECIPIENTS OF THE DATA

Personnel of the Company belonging to the marketing and commercial departments, IT technicians and other individuals who need to process data in the performance of their duties are authorised to process user data, and have been duly instructed by the Controller pursuant to Art. 29 of EU Regulation 2016/679.

In addition, data may be communicated to:

- providers of services for the management of the information system and communication networks (including email), web agencies and providers for website management, personnel selection officers, labour consultants for the purpose of preparing the documentation necessary for the possible establishment of an employment relationship, recruitment platform providers, etc.;
- firms or companies in the context of assistance and consultancy relationships;
- competent authorities for the fulfilment of legal obligations and/or provisions of public bodies, upon request.

The parties receiving the data process it as Controllers, Processors or authorised persons, as the case may be, for the purposes indicated above and in compliance with applicable privacy legislation.

The list of Data Processors is constantly updated and available by writing to: marketing@gruppocmt.eu

TRANSFER OF DATA TO A THIRD COUNTRY AND/OR AN INTERNATIONAL ORGANISATION AND GUARANTEES

Personal data is processed within the EU.

However, in the event of a possible transfer of data to Third Countries, including countries that may not guarantee the same level of protection as provided for by Privacy Regulations, the Controller hereby gives notice that processing will in any case be carried out in accordance with one of the methods permitted by the Regulation, such as for example the user's consent, the adoption of Standard Contractual Clauses approved by the European Commission, the selection of parties adhering to international programmes for the free flow of data or operating in countries considered safe by the European Commission.

DATA RETENTION PERIOD OR CRITERIA FOR DETERMINING THE PERIOD

Processing will be carried out in both automated and manual form, using methods and tools aimed at ensuring maximum security and confidentiality, by specially authorised persons. In accordance with the provisions of Art. 5, paragraph 1, lett. e) of EU Regulation 2016/679, the personal data collected will be stored in a form that allows the identification of data subjects for a period no longer than that necessary to achieve the purposes for which the personal data is processed. The retention period of the personal data provided depends on the purpose of the processing (see table).

The timeframe is determined on the basis of criteria about which the data subject may obtain specific information by writing to: marketing@gruppocmt.eu

RIGHTS OF DATA SUBJECTS



You may exercise your rights as set out in EU Regulation 2016/679 by contacting the Controller, sending an email to: marketing@gruppocmt.eu or writing to the Controller's registered address indicated above. You have the right, at any time, to request from the Controller access to your personal data (art. 15), rectification (art. 16) or erasure (art. 17) thereof, or restriction of processing (art. 18), or to object to processing based on legitimate interest (art. 21).

Where processing is based on consent, you have the right to withdraw your consent at any time without affecting the lawfulness of processing based on consent given prior to its withdrawal.

To object to processing and to exercise other rights, you may write to: marketing@gruppocmt.eu

You have the right to lodge a complaint with a supervisory authority. The provision of personal data is not an obligation. You are free to provide personal data in the dedicated areas of the site. Failure to provide personal data makes it impossible to use the services offered by the data controller.

There is no automated decision-making process in place.

This policy may be subject to updates. Users are therefore invited to periodically check for any changes.

Last updated: 04.11.2024