POMIAGER S.r.l. and Pomiager USA Ltd consider the protection of the personal data of users of their websites www.pomiager.com, www.pomiager.us (hereinafter the "Sites") and of the applications owned by the group to be of fundamental importance.

This Privacy Policy informs users, pursuant to Article 13 of EU Regulation 2016/679 (the "GDPR"), that personal data provided by users while browsing or in order to use the services offered by the Sites or applications will be processed in accordance with principles of fairness, lawfulness, transparency, protection of privacy and of users' rights, in full compliance with applicable data protection legislation.

1. Data controllers

The data controllers of POMIAGER S.r.l. and Pomiager USA Ltd are defined as follows:

	POMIAGER S.r.l.	**Pomiager USA Ltd**
Website	www.pomiager.com	www.pomiager.us
Details	VAT no. 03332011208 privacy@pomiager.com pomiager@pec.pomiager.com Registered and operational office: Via di Corticella 181/3 - 40128 Bologna (BO), Italy	EIN 33-1891674 international@pomiager.com pomiager@pec.pomiager.com Registered and operational office: c/o Spaces, 100 S. Juniper St., The Hale Building, Philadelphia, PA 19107, USA
Privacy contact	Giuseppe Adduce – CEO	Giuseppe Adduce – CEO

2. Types of data processed

Browsing data. The IT systems and software procedures that operate the Site acquire, during their normal operation, certain personal data whose transmission is implicit in the use of Internet communication protocols (domain name and IP address, type of browser and operating system, date, time and length of stay on the site, pages visited, and any search engine from which the user arrived). This information is not collected in order to be linked to identified individuals; however, by its nature, it could allow users to be identified through processing and association with data held by third parties.

This category includes IP addresses or domain names of the computers used by users who connect to the Site, the URI (Uniform Resource Identifier) addresses of requested resources, the time of the request, the method used to submit the request to the server, the size of the file returned, the numeric code indicating the server's response status (success, error, etc.), and other parameters relating to the user's operating system and IT environment. These data are used only to produce anonymous statistical information on use of the Site and are deleted immediately after processing, without prejudice to the need to establish any civil or criminal liability.

Personal data provided by users of the Sites and applications. To use the Services, Sites or applications of POMIAGER S.r.l. and Pomiager USA Ltd, users will be asked to provide identifying personal data and contact details, as detailed in the following section.

3. Methods, purposes and legal basis of processing

Users' personal data will be processed by personnel expressly authorized and instructed by each controller, using IT, electronic or paper tools, with appropriate technical and organizational security measures pursuant to Article 32 of the GDPR, designed to reduce the risk of destruction, loss, unauthorized access, or processing that is not permitted or otherwise inconsistent with the purposes of collection.

POMIAGER S.r.l. and Pomiager USA Ltd will retain data for no longer than necessary to achieve the processing purposes, for the following purposes:

Request for information or quotes from the user

Data processed	User identification data
Legal basis	Performance of pre-contractual measures, Art. 6(1)(b) GDPR
Providing data	Failure or inaccurate provision may make it impossible to follow up on the user's request
Retention	Proportionate to the purposes pursued

Access to platforms and use of the Service

Data processed	User identification data
Legal basis	Performance of a contract, Art. 6(1)(b) GDPR
Providing data	Failure or inaccurate provision may prevent access to the applications and/or the related Services
Retention	Proportionate to the purposes pursued

Newsletter subscription

Data processed	User identification data
Legal basis	Consent of the data subject, Art. 6(1)(a) GDPR
Providing data	Failure or inaccurate provision may prevent subscription to the newsletter
Retention	Until the user withdraws consent. The user may withdraw consent at any time by using the "unsubscribe" link in newsletter emails or by contacting the controller.

Job application / unsolicited application

Data processed	User identification data and data contained in the CV
Legal basis	Consent of the data subject, Art. 6(1)(a) GDPR
Providing data	Failure or inaccurate provision may affect the outcome of the selection process
Retention	User data will be deleted 12 months after the application is submitted

4. Disclosure of data

Personal data provided by users may be communicated to public, institutional or professional bodies entitled by law to request it, and, solely for the purposes set out in Section 3, to third-party companies or professionals used by POMIAGER S.r.l. and Pomiager USA Ltd in the course of their business, such as, by way of example and not exhaustively, accounting and tax consultants, legal advisers, and industry consultants. Where these "third parties" do not act as independent controllers, they act, in accordance with Article 28 of the GDPR, as processors and are bound by contractual agreements to observe appropriate security standards for the data communicated to them. The list of third parties is available upon express request sent to each controller at the contact details listed at the end of this policy. In any case, users' personal data will not be disseminated or transferred to non-EU countries.

5. Cookies

For information on the cookies used by the Sites, please see the Cookie Policy.

6. Rights of data subjects

Under Articles 15 et seq. of the GDPR, users may at any time exercise the following rights against each of the controllers:

- **Right of access**: to access their personal data and obtain a copy.
- **Right to rectification**: to obtain correction of inaccurate data, or completion of incomplete data.
- **Right to erasure**: to obtain deletion of their data in the cases provided for in Article 17 GDPR.
- **Right to restriction of processing**: in the cases provided for in Article 18 GDPR.
- **Right to data portability**: to receive their personal data in a structured, commonly used and machine-readable format, and to have it transmitted to another controller.
- **Right to object**: to object at any time, for reasons relating to their particular situation, to processing based on Article 6(1)(e) or (f) GDPR, and to object to processing for direct marketing purposes.
- **Right to lodge a complaint** with the supervisory authority (in Italy, the Garante per la Protezione dei Dati Personali), pursuant to Article 77 GDPR.

To exercise these rights, or to obtain more information about this Privacy Policy, data subjects may contact the companies by email or certified email (PEC) at the following addresses:

- POMIAGER S.r.l.: privacy@pomiager.com or pomiager@pec.pomiager.com
- Pomiager USA Ltd: privacy@pomiager.com or pomiager@pec.pomiager.com

Please note that before providing or modifying any information, the data subject's identity may need to be verified.

Information on this Privacy Policy

This Privacy Policy was last updated on 26/06/2026. The controller reserves the right to amend or update this document at any time, and therefore invites users to check this web page periodically. The companies expressly state that they are not in any way responsible for the content and services provided by third-party websites accessible through links on the Site.