PRIVACY NOTICE – MARKETING ACTIVITIES

(Articles 13-14 GDPR – Regulation (EU) 2016/679)

1. Scope of Application

This notice applies whenever STESI S.r.l. carries out marketing activities directed at customers, prospects, or professional contacts, through newsletters, commercial e-mail communications, invitations to events, webinars, trade fairs, or other promotional initiatives. It also applies to contacts collected through online forms, business enquiries, or professional meetings.

2. Data Controller

STESI S.r.l., with registered office at Via Villa Liccer 10/7, 31020 San Fior (TV), Italy, VAT No. (P.IVA) 04361220264
E-mail: privacy@stesi.it
Certified e-mail (PEC): stesi@arubapec.it

3. Categories of Personal Data Processed

STESI may process the following data:

- first name and surname
- e-mail address
- telephone number
- job title / role within the company
- company or organisation of affiliation
- preferences and areas of interest
- interaction with communications data: date and time of e-mail opens and link clicks, together with technical data transmitted by the e-mail client, collected through tracking pixels and tracked links (see section 4-bis)

The data may be collected through:

- contact or newsletter subscription forms
- events, webinars, trade fairs
- requests for commercial information
- existing business relationships with customers or prospects

4. Purposes and Legal Bases of Processing

a) Sending newsletters, commercial communications, promotions, event and webinar invitations.
Legal basis:

- the data subject's consent (Article 6(1)(a) GDPR); or
- the Controller's legitimate interest (Article 6(1)(f) GDPR), where the recipient is an existing customer and the communications relate to similar products or services (Article 130(4) of the Italian Data Protection Code).

b) Measurement of opens and clicks on communications at individual level, through tracking pixels (see section 4-bis).
Legal basis:

- the data subject's consent (Article 122 of the Italian Data Protection Code and Article 6(1)(a) GDPR).

c) Management of subscriptions, unsubscriptions, and preferences.
Legal basis:

- compliance with legal and regulatory obligations;
- the Controller's legitimate interest in the proper management of contact lists.

4-bis. Tracking Pixels in E-mails

STESI newsletters and commercial communications contain a tracking pixel, i.e. a transparent 1x1 pixel image

Stesi S.r.l.
Via Villa Liccer, 10/7
31020 San Fior (TV)
Tel: +39.0438.403271
VAT Code 04361220264
SDI KUPCRMI
info@stesi.it - www.stesi.it

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uniquely associated with each recipient. Links contained in the e-mails pass through a redirect address. When the data subject opens an e-mail and loads its images, or clicks a link, STESI's e-mail marketing system (Odoo) records the event and associates it with their e-mail address, in order to measure the effectiveness of communications. Consent to tracking (legal basis in section 4(b)) is collected together with consent to receive newsletters and commercial communications. Recipients who have not given it, such as the existing customers referred to in section 4(a), receive e-mails without individual tracking. The data subject may disable tracking only, at any time, and continue to receive communications, through the "Manage tracking" link at the bottom of each newsletter or by writing to privacy@stesi.it, and may re-enable it from the same page. Once tracking is disabled, e-mails no longer contain the pixel and links lead directly to the destination page. Each choice is recorded with its date, source and related communication.

5. Data Retention Period
With consent: until withdrawal, and in any event for no longer than 24 months from the last significant interaction. Where processing is based on legitimate interest (existing customers): for up to 24 months from the last relevant contact or business relationship. Upon expiry of these periods, the data will be deleted or anonymised.

6. Disclosure of Data
The data may be disclosed to:
- providers of e-mail marketing services (e.g., Odoo, and similar);
- CRM service providers;
- companies organising events or webinars on behalf of STESI;
- authorised consultants and business partners;
- sub-processors appointed pursuant to Article 28 GDPR.

An updated list of external Data Processors is available upon request.

7. Transfers Outside the European Union
Where personal data are processed through services involving transfers to countries outside the European Union, such transfers will be carried out in compliance with Articles 45-46 GDPR (adequacy decisions, Standard Contractual Clauses, and supplementary measures).

8. Rights of the Data Subject
The data subject may, at any time:
- withdraw consent previously given;
- object to the processing (Article 21 GDPR);
- request access, rectification, erasure, or restriction of processing;
- request data portability, where applicable;
- lodge a complaint with the Italian Data Protection Authority (www.garanteprivacy.it).

To exercise these rights:
E-mail: privacy@stesi.it
Certified e-mail (PEC): stesi@arubapec.it
The data subject may unsubscribe independently through the link provided in each communication. Unsubscribing withdraws consent both to receiving communications and to the tracking of opens and clicks.

9. Consent to Processing
Consent is always freely given, specific, informed, and revocable at any time. STESI will send commercial communications only where:
- the data subject has given consent; or
- is already a customer and communications relate to similar services in compliance with Article 130(4), Data Protection Code.

Last updated: 13 November 2026

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