

Snap-on Equipment Srl a unico socio Via Prov. Carpi, 33 42015 Correggio (RE) - ITALY C.F. 12490320152 - P.I. 01866820358 is part of the Snap-on group of companies which process your data. Snap-on Group is a global organization with affiliates, subsidiaries, business processes, management structures and technical systems that cross borders. As such, we will share the personal data we collect with other companies within the Snap-on, Incorporated group and transfer it to countries in the world where we do business in connection with the uses identified above and in accordance with this Information Notice

Should you have any questions or concerns regarding this policy, please contact our Headquarter :

- HR Department
- I/T Department
- Marketing Department
- Customer Service Department

Phone: +39 (0)522 733411

Fax: +39 (0)522 733410

E-mail address: snapon-equipment@pec.it.

For the issues that need to be deepened please communicate to Data Protection Manager at DataProtectionManager@Snapon.com.

We appreciate your interest in our services and your visit to this website. The protection of your privacy in the processing of your personal data is an important concern to which we pay special attention during our business processes.

This Privacy Policy answers frequently asked questions about the kinds of data we collect and how it is used. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

1. What personal data do we gather?

We collect and process a range of personal data including:

Data you give to us:

- This is information about you that you give to us by filling in forms on our site or by corresponding with us by phone, e-mail, in person or at trade shows or events or otherwise. It includes information you provide when you register to use our site, subscribe to our service, search for a product and when you report a problem with our site. The information you give to us includes for example: name, title, address, business telephone number, purchase information, business email address, fax number, country of origin/nationality, passport number, country of residence, financial and credit card information, personal description, photograph, customer number, business-related information, preferences provided by Internet activity, survey responses marketing efforts, and the name of the company you work for.

Data we collect about you:

- With regard to each of your visits to our site we will automatically collect information about your visits through the use of various technologies, this will include information about your internet service

provider, browser type, operating system, pages accessed on our sites and online sources, and the date and time of access in order to optimise your user experience and enhance your time spent with us online. We also receive information telling us what site you came to our site from. Our website, apps and online services use cookies to distinguish you from other users. This helps us to provide you with a good experience and also allows us to improve our site and services. For detailed information on the technologies we, see Cookie Section (chapter 10).

Data we collect from other sources:

- We may also receive information about you from other websites we operate or the other services we provide. We may also receive information about you from our franchisees or agents. In this case we will have informed you when we collected that data if we intend to share that data internally and/or combine it with data collected on this site. We will also have told you for what purpose we will share and combine your data.
- We also work with third parties including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, lead generators, data aggregators, social media platforms, and credit reference agencies. We will notify you when we receive information about you from them and the purposes for which we intend to use that information.
- We also enable you to submit information about other people. For example, we may request that you provide us with information about your dealer or representative or, if you order a product for someone else online and want it sent directly to the recipient, you might submit the recipient's name and address. The types of personal data that may be collected about other people include: dealer or representative's name and contact information, and a product recipient's name, address, e-mail address, and telephone number. We will ask you to confirm that they have obtained appropriate consent for you to share that data with us.
- In the course of our recruitment process (see recruitment section) we will collect and process the personal data provided, such as; name, email address, mobile phone number, CVs, educational information, information on previous employer, passport information, citizenship status, visa information, gender, driver's license information, home address, language proficiency and job performance information.

This may include data we receive directly from you (for example, your resume or information provided by corresponding with us by mail, phone, email or otherwise) and data we receive from other sources (including, for example referees, background check authorities and others). We will process your personal data where it is necessary for us to evaluate your application in the recruitment process and to ensure compliance with applicable law and reporting requirements. Your personal data will only be accessed by authorized personnel and processed to the extent that it is necessary for the above purposes.

2. How is that personal data used by us?

We may use personal data held about you in the following ways:

- **Website Experience:** for the technical administration of the website; for internal operations; for customer administration; for product surveys; for troubleshooting; for data analysis, data analytics, testing, and research and development purposes; to ensure that content from our site is presented in the most effective manner for you and for your computer; and as part of our efforts to keep our site safe and secure;

- **Business Uses:** to fulfil a transaction request or to carry out our obligations arising from any contracts you enter into with us or to send more information about becoming a franchisee or dealer; to carry out a credit check; to send renewal notices; to establish and manage accounts; and to analyse and develop new products, services and website;
- **Providing Support:** to provide customer support, manage subscriptions, and respond to requests, questions, and comments; to notify you about changes to our service; and to measure how effectively we address your concerns;
- **Monitoring & Recording:** to handle any calls, chats or other interactions with us, including by the customer services team. Please be aware that it is our general practice to monitor and in some cases record such interactions for staff training or quality assurance purposes or to retain evidence of a particular transaction or interaction.
- **Mobile Applications:** to make available mobile applications, to implement social media platforms on some of our websites, to register on these platforms. Please refer also to any supplemental privacy policy that may be available with respect to these third party social media platforms.
- **Protecting our Rights and Property:** to protect our rights or property or that of our business partners, franchisees, dealers, suppliers, customers or others when we have reasonable grounds to believe that such rights or property have been or could be affected; to recover debts; to prevent, detect, identify, investigate, respond, and protect against potential or actual claims, liabilities and prohibited behaviour or activities.
- **Information for our Business Partners, Dealers and Franchisees:** to administer and develop our business relationship with you, the business partner, dealer or franchisee you represent, including sharing information with our group, to enter into or perform a transaction with you, to contact you as part of satisfaction surveys or for market research purposes;
- **Marketing:** to communicate about, and administer participation in, special events, programs, surveys, contests, sweepstakes, and other offers and promotions; to provide you with information about other goods and services we offer, or offered by others, that are similar to those that you have already purchased or enquired about and to send informational or promotional email messages to you, which you may opt out of receiving as described below; and
- **Surveys:** to request and receive from you information regarding your experience with our products and services. We may use the information to design offers customized to your interests.
- **Recruitment process:** We will not keep your personal data in a form that allows you to be identified for any longer than is reasonably necessary for achieving the permitted purposes. This means that data will be destroyed or erased from our systems or anonymized when it has reached the applicable retention period of 1 (one) year.

1. On what legal basis do we gather and use my data?

We gather and use your personal data for either (i) the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract, and/or (ii) for direct marketing purposes, and/or (iii) our legitimate interests and in compliance with your fundamental rights and freedoms and/or (iv) because of a legal obligation, and/or (v) to protect your vital interests.

4. Is my personal data transferred or provided to third parties?

Snap-on is a global organization with affiliates, subsidiaries, business processes, management structures and technical systems that cross borders. As such, we will share the personal data we collect with **Snap-on Equipment Srl a unico socio**, and other companies within the **Snap-on** group and transfer it to countries

in the world where we do business in connection with the uses identified above and in accordance with this Privacy Policy.

Subject to their compliance with applicable legislation and/or this Privacy Policy, we will also disclose your personal data to selected non-affiliated third parties, including those that perform transaction processing or servicing functions, credit reference agencies, debt collection agencies, and/or other companies that provide services on our behalf, professional service providers (including translators, legal advisers and accountants), adverse parties who have a legal right to receive such information and their counsel and experts, law enforcement authorities, and other government authorities.

We will disclose such data for the following purposes:

- to service the legal agreement between us and third parties, to enforce the terms of use, to meet our obligations to content and technology providers;
- to manage client, dealer, franchisee, and customer accounts effectively, to service and process transactions, to market products and services offered by us and our affiliated companies, to manage our business;
- to improve and optimise our site and services;

to enable them to offer products or services that may be of interest to you (provided that you have consented), which you may opt out of receiving as described below; and as required by law in cases where we are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation, or to protect our rights, property, or safety, as well as that of our customers, clients, dealers, franchisees or others or in response to a court order, subpoena or a law enforcement agency's request.

- Relating the Recruitment section, subject to their compliance with applicable legislation and/or our procedures and policies for data security, we will also disclose your personal data to selected non-affiliated third parties, including recruitment agencies, background check agencies or other government authorities who have a legal right to receive such information.

Circumstances may arise where, whether for strategic or other business reasons, we decide to sell, buy, merge or otherwise reorganise our business. Such a transaction may involve the disclosure of personal data to prospective or actual purchasers, or the receipt of such data from sellers. It is our practice to seek appropriate protection for data in these types of transactions.

We use non-identifying and aggregate information to better design and improve our web site and services and gather information for product management and development. For example, we may tell our sales and marketing staff that X number of individuals visited a certain area on our web site, or that Y number of software licenses were ordered during a particular time period. This aggregate information may also be shared with our affiliates and independent dealers.

5. How long will my personal data be kept for?

We will endeavour not to keep your personal data in a form that allows you to be identified for any longer than is reasonably necessary for achieving the permitted purposes. This means that data will be destroyed or erased from our systems or anonymized when it has reached the applicable retention period.

6. Will my personal data be transferred to other countries?

Personal data may be transferred outside of the European Economic Area ("EEA") to members of our group and other third parties as set out above, provided that certain conditions as set out in the applicable legislation are complied with. Your personal data will also be processed by staff operating outside the EEA who work for us. This includes staff engaged in, among other things, the fulfilment of your order and the provision of support services.

We are party to a data transfer agreement with the members of our group and we will (i) keep that document up to date with current law, and (ii) only engage in personal data transfers from the EEA to outside the EEA in accordance with such an agreement or an alternative means of transfer in compliance with data protection legislation. For more information on the safeguards in place, please contact the Data Protection Manager at DataProtectionManager@Snapon.com.

7. What security measures are in place to protect my personal data?

We endeavour to protect the security of your personal data. We will seek to maintain administrative, technical and physical safeguards to protect against loss, misuse or unauthorized access, disclosure, alteration or destruction of your personal data.

Unfortunately, the transmission of information via the internet is not completely secure. Although we endeavour to protect your personal data, we cannot guarantee the security of your personal data transmitted to us or stored on our systems; any transmission is at your own risk. Once we have received your personal data, we will use procedures and security features to try to prevent unauthorised access. These procedures include physical, electronic, and managerial procedures. When you place orders or access your account information, we offer the use of a server that encrypts the information you input before it is sent to us.

8. How do I update or access my personal data?

We ask that you keep your data as up-to-date as possible so you may get the maximum benefit from us. If you have an account with us and need to update your personal data, please contact us using the Customer Service section on the website.

9. What rights do I have in relation to my personal data?

Depending on the circumstances, you may have the right to:

- request access to any personal data we hold about you;
- object to the processing of your data for direct-marketing purposes;
- ask to have inaccurate data held about you amended or updated;
- ask to have your data erased or to restrict processing in certain limited situations;
- request the porting of your personal data to another organization in control of your personal data; and/or
- object to any decision that significantly affects you being taken solely by a computer or other automated process.

If you wish to make a formal request for information we hold about you, you can contact us, [here](#)

For the issues that need to be deepened please communicate to Data Protection Manager at DataProtectionManager@Snapon.com.

10. How do I opt out of being contacted for promotional purposes?

You have the right to ask us not to send you marketing communications. We will usually inform you (before collecting the personal data) if we intend to use your personal data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect personal data. You can also exercise the right to prevent such processing at any time by:

- Clicking the unsubscribe link in any informational or promotional email that we send you.
- Use Contact Us section if you want to modify your subscription, email and contact preferences or if you have questions about removing your name from our subscription lists.
- Calling our Customer Service at +39 0522 733411 if you have any questions about changing your contact preference or require assistance in removing your name from our subscription lists.

11. How do we use cookies?

We use cookies, tags, and other similar technologies to distinguish you from other users of our website, apps and online services. This helps us to provide you with a good experience when you browse our website, apps and online services and also allows us to improve our site and services.

Most browsers automatically accept cookies. By continuing to browse the site or use our services, you are agreeing to our use of cookies. However, you can prevent cookies from being stored on your computer or device by setting your browser to not accept cookies. The exact instructions for this can be found in the manual for your browser. You can delete cookies already on your computer or device at any time. If you choose to set your browser settings so cookies are not accepted, then you can still visit our website, apps and online services, however doing so may affect your use of some parts of our web services, apps and online services and reduce availability of the services provided by our website, apps and online services.

We use the following cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our website, apps and online services. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.
- **Analytical/performance cookies.** These allow us to recognize and count the number of visitors and to see how visitors move around our website, apps and online services when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- **Functionality cookies.** These are used to recognize you when you return to our website, apps and online services. This enables us to personalize our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Targeting cookies.** These cookies record your visit to our website, apps and online services, the pages you have visited and the links you have followed. We will use this information to make our website, apps and online services and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

Cookie	Name	Purpose	More information
Marketing website	_ga	Used to distinguish users.	Google analytics cookie
	_gid	Used to distinguish users.	
	_gat	Used to throttle request rate. If Google Analytics is deployed via Google Tag Manager, this cookie will be named	

Recruitment HR website	AMP_TOKEN	<p><code>_dc_gtm_<property-id></code></p> <p>.</p> <p>Contains a token that can be used to retrieve a Client ID from AMP Client ID service. Other possible values indicate opt-out, inflight request or an error retrieving a Client ID from AMP Client ID service.</p>
	<code>_gac_<property-id></code>	<p>Contains campaign related information for the user. If you have linked your Google Analytics and Google Ads accounts, Google Ads website conversion tags will read this cookie unless you opt-out.</p>
	PHPSESSID	<p>PHPSESSID only contain a reference to a session stored on the web server. No information is stored in the user's browser and this cookie can only be used by the current web site.</p>
	X-Mapping-oofohen	<p>X-Mapping-oofohen : used by the data center to ensure proper traffic routing between load-balanced servers</p>
	ASP.NET_SessionId	<p>Preserves the visitor's session state across page requests</p>
Service & Sales Online website	sap-usercontext	<p>Technical cookie to fill ERP user's connection data like "sap-language=EN&sap-client=110"</p>

Except for essential cookies, all cookies will expire after 2 years.

12. What should I do if I think there has been a breach of the applicable data protection legislation or this Privacy Policy?

If you consider that the applicable data protection legislation or this policy has not been followed, then you should raise the matter with the Data Protection Manager at DataProtectionManager@Snapon.com. Any breach will be taken seriously.

13. Modifications to this Privacy Statement

We reserve the right to modify this Privacy Policy at any time and without prior notice. We will post any changes on our website so please check regularly for the most recent version of our Privacy Policy. This version was posted on February 11, 2019.

14. Links

This site contains links to other sites. Please be aware that we are not responsible for the content or privacy practices of those sites, and our Privacy Policy does not apply to information collected from you by those sites. We encourage you to read the privacy statements of each site that collects information from you. When you are leaving our site via a link to interact with a site that is not governed by our Privacy Policy, a new browser window will open. If your interaction with our site will require sending your information to a third-party site that is not governed by our privacy policy, we will clearly inform you before your information is sent.