

PRIVACY POLICY

Last updated: 5 October 2026

This Privacy Policy describes how personal data of users visiting www.whitefluid.com (the “Website”) are processed in accordance with Regulation (EU) 2016/679 (“GDPR”) and applicable Italian data protection legislation.

1. DATA CONTROLLER

The Data Controller is:

Whitefluid Cylinders S.r.l.

Via Domenico Bernabei, 180
41054 Marano sul Panaro (MO)
Italy

VAT No. / Tax Code: **04241350364**

Email: info@whitesolutions.it

Tel.: **+39 059 86 77 942**

The Website is technically managed with the support of **Parmafluid S.r.l.**, a company of the Parmafluid Group, which may process personal data exclusively where necessary for the technical management, maintenance, security and operation of the Website and in accordance with applicable data protection legislation.

2. TYPES OF PERSONAL DATA PROCESSED

2.1 Browsing data

During normal operation, the IT systems and software procedures used to operate the Website may automatically collect certain information relating to users.

Such information may include:

- IP address;
- browser type and version;
- device type;
- operating system;
- date and time of access;
- requested pages;
- referring page;
- technical information relating to the connection.

This information is primarily processed to ensure the correct functioning and security of the Website, to obtain technical and statistical information and, where necessary, to investigate possible cyberattacks, fraudulent activities or other unlawful conduct.

2.2 Data voluntarily provided by users

The voluntary sending of emails to the addresses published on the Website entails the acquisition of the sender's email address and any other personal data included in the communication.

Users may contact Whitefluid Cylinders to:

- request information about products or services;
- request a quotation;
- request technical or commercial information;
- establish or manage a business relationship;
- submit other enquiries relating to Whitefluid Cylinders' activities.

Users are requested not to provide special categories of personal data pursuant to Article 9 GDPR unless strictly necessary.

3. PURPOSES AND LEGAL BASIS OF PROCESSING

Personal data may be processed for the following purposes.

A. Operation of the Website

To allow users to access and browse the Website and to provide the content and functions requested.

Legal basis: performance of services requested by the user and the legitimate interest of the Data Controller in ensuring the proper operation of its Website.

B. Website and IT security

To protect the Website, IT infrastructure and information systems from unauthorised access, cyberattacks, fraud and other security incidents.

Legal basis: legitimate interest of the Data Controller in protecting its IT infrastructure, data and business activities.

C. Responding to enquiries and quotation requests

To respond to enquiries voluntarily submitted by users and to provide requested technical, commercial or product information.

Legal basis: taking steps at the request of the data subject prior to entering into a contract and, where applicable, performance of a contract.

D. Management of business relationships

Where contact results in a commercial relationship, personal data may be processed for the management of quotations, orders, supplies, customer relationships and related administrative activities.

Legal basis: performance of a contract or pre-contractual measures requested by the data subject.

E. Compliance with legal obligations

Personal data may be processed where necessary to comply with obligations imposed by Italian or European Union legislation or requests from competent authorities.

Legal basis: compliance with a legal obligation to which the Data Controller is subject.

F. Establishment, exercise or defence of legal claims

Where necessary, personal data may be retained or processed to establish, exercise or defend the rights of the Data Controller.

Legal basis: legitimate interest of the Data Controller in protecting its rights.

4. PROVISION OF PERSONAL DATA

Providing personal data through email communications is voluntary.

However, failure to provide the information necessary to process a request may make it impossible for Whitefluid Cylinders to respond, provide the requested information or prepare a quotation.

Technical data strictly necessary for accessing and operating the Website are processed automatically when the Website is used.

5. METHODS OF PROCESSING

Personal data are processed using electronic and, where necessary, manual means in accordance with the principles of lawfulness, fairness, transparency, purpose limitation, data minimisation, accuracy, integrity and confidentiality established by the GDPR.

Appropriate technical and organisational measures are adopted to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access.

6. RECIPIENTS OF PERSONAL DATA

Personal data may be processed by employees and authorised personnel of Whitefluid Cylinders and may be disclosed, where necessary, to third parties providing services connected with the operation of the Website or the management of business activities.

These parties may include:

- hosting and IT infrastructure providers;
- website developers and maintenance providers;
- email and communication service providers;
- IT security providers;
- consultants and professional advisers;
- companies belonging to the Parmafluid Group where their involvement is necessary for the requested service or for technical and organisational purposes;
- **Parmafluid S.r.l.**, in connection with the technical management, maintenance and operation of the Website;
- public authorities or other entities where disclosure is required by law.

Where required by Article 28 GDPR, external service providers processing personal data on behalf of the Data Controller are appointed as Data Processors.

Personal data will not be publicly disclosed.

7. INTERNATIONAL DATA TRANSFERS

Where a service provider processes personal data outside the European Economic Area (“EEA”), any transfer of personal data will be carried out in accordance with Articles 44 et seq. of the GDPR.

Where applicable, transfers may be based on:

- an adequacy decision adopted by the European Commission;
- Standard Contractual Clauses approved by the European Commission;
- another lawful transfer mechanism recognised under the GDPR.

Appropriate supplementary safeguards will be implemented where required.

8. DATA RETENTION

Personal data are retained only for as long as necessary to fulfil the purposes for which they were collected.

In particular:

- browsing and security data are retained for the period reasonably necessary to ensure the security and proper operation of the Website;
- data relating to general enquiries are retained for the time necessary to respond to and manage the request;

- data relating to quotation requests and pre-contractual communications may be retained for the period necessary to manage the potential business relationship;
- data relating to existing contractual relationships may be retained for the duration of the relationship and subsequently for the period required under applicable civil, tax and accounting legislation;
- data necessary for the establishment, exercise or defence of legal claims may be retained for the applicable limitation period.

9. DATA SUBJECT RIGHTS

Under Articles 15 to 22 of the GDPR, where applicable, data subjects have the right to:

- obtain confirmation as to whether their personal data are being processed;
- obtain access to their personal data;
- request rectification of inaccurate or incomplete personal data;
- request erasure of personal data;
- request restriction of processing;
- object to processing based on legitimate interests;
- receive personal data in a structured, commonly used and machine-readable format and request data portability where applicable;
- withdraw consent at any time where processing is based on consent, without affecting the lawfulness of processing carried out before withdrawal;
- lodge a complaint with the competent supervisory authority.

Requests concerning the exercise of these rights may be sent to:

info@whitesolutions.it

The Data Controller may request information necessary to verify the identity of the person making the request.

10. RIGHT TO LODGE A COMPLAINT

Data subjects who believe that the processing of their personal data infringes applicable data protection legislation have the right to lodge a complaint with the competent supervisory authority.

In Italy, the competent authority is:

Garante per la protezione dei dati personali

Italian Data Protection Authority

Further information is available on the Authority's official website.

11. COOKIES AND SIMILAR TECHNOLOGIES

The Website may use cookies and similar technologies that are necessary for its technical operation and security.

Any optional cookies or tracking technologies, if implemented, will be managed in accordance with applicable legislation and, where required, activated only after obtaining the user's consent.

For further information, please refer to the Website's **Cookie Policy**.

12. THIRD-PARTY WEBSITES

The Website may contain links to third-party websites.

Whitefluid Cylinders does not control the processing of personal data carried out by such third parties and is not responsible for their privacy practices.

Users are encouraged to review the privacy policies of the relevant third-party websites.

13. CHANGES TO THIS PRIVACY POLICY

Whitefluid Cylinders reserves the right to amend or update this Privacy Policy where necessary, including as a result of changes to applicable legislation, Website functionality or the services provided.

The most recent version will always be made available on this Website.

Last updated: 5 October 2026

COOKIE POLICY

Last updated: 5 October 2026

This Cookie Policy explains how cookies and similar technologies are used on www.whitefluid.com (the "Website").

The Data Controller is:

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1. WHAT ARE COOKIES?

Cookies are small text files that websites may store on a user's computer, smartphone, tablet or other device while browsing.

Cookies allow websites to store certain information relating to the user's visit and may be used for different purposes, including ensuring the technical operation of a website, maintaining security, remembering preferences or, where applicable and subject to the user's consent, measuring website usage or providing personalised content.

Cookies may be classified according to their duration as:

Session cookies – deleted automatically when the browser is closed.

Persistent cookies – stored on the user's device for a predetermined period or until manually deleted.

Cookies may also be classified according to the entity placing them:

First-party cookies – set directly by the Website visited by the user.

Third-party cookies – set by a domain or service other than the Website being visited.

2. STRICTLY NECESSARY COOKIES

The Website may use technical cookies and similar technologies that are strictly necessary for its operation, security and delivery of services requested by the user.

These technologies may be necessary to:

- ensure that Website pages load and operate correctly;
- maintain Website and network security;
- manage technical browsing sessions;
- prevent fraudulent or malicious activity;
- store the user's cookie preferences, where a consent management system is implemented.

Strictly necessary cookies do not require the user's consent.

Where such cookies are disabled through browser settings, certain parts of the Website may not function correctly.

3. ANALYTICS COOKIES

The Website does not intentionally activate non-essential analytics cookies unless such tools are specifically implemented.

If analytics tools requiring consent are implemented in the future, they will remain disabled until the user has provided the required consent.

Analytics technologies that qualify as technical cookies under applicable Italian legislation may be used without consent only where all applicable legal requirements are satisfied.

4. MARKETING AND PROFILING COOKIES

The Website does not intentionally activate marketing or profiling cookies unless such technologies are specifically implemented.

Any cookies or similar technologies used for advertising, remarketing, profiling or tracking users across different websites or services will be activated only after obtaining the user's prior consent where required by applicable law.

Refusing such cookies will not prevent access to the Website.

5. THIRD-PARTY SERVICES AND EMBEDDED CONTENT

The Website may contain links to third-party websites or services.

Simply following a link to an external website may result in the third party processing data according to its own privacy and cookie policies.

If embedded third-party services such as videos, maps, social media content or other external resources capable of placing non-essential cookies are introduced on the Website, such services will be subject to prior consent where required by applicable legislation.

6. COOKIE CONSENT MANAGEMENT

Where the Website uses cookies or tracking technologies that require consent, users must be provided with the possibility to:

- **Accept all** optional cookies;
- **Reject all** optional cookies;
- **Manage preferences** by cookie category.

Non-essential cookies must remain disabled until the user has provided valid consent.

Refusing optional cookies must not prevent the user from accessing the Website.

Users must also be able to modify or withdraw their consent at any time through a **“Cookie Settings”** or equivalent function made permanently accessible from the Website.

Withdrawal of consent does not affect the lawfulness of processing carried out before consent was withdrawn.

7. COOKIES USED BY THE WEBSITE

The actual cookies installed by the Website depend on its current technical configuration.

Strictly necessary cookies may be used without consent where required for the operation and security of the Website.

Any analytics, marketing, profiling or other non-essential cookies must be identified and classified according to their actual purpose and must not be activated before consent where consent is required.

The Website's cookie configuration should be periodically reviewed to ensure that the information provided in this Cookie Policy corresponds to the technologies actually in use.

8. HOW TO MANAGE COOKIES THROUGH YOUR BROWSER

Users may configure their browser to block, restrict or delete cookies.

Cookie settings vary depending on the browser and device used. Instructions are normally available in the privacy or security settings of the relevant browser.

Users should be aware that disabling strictly necessary cookies may affect the correct operation of certain Website features.

Browser settings operate independently from any cookie consent settings provided directly by the Website.

9. PERSONAL DATA PROCESSED THROUGH COOKIES

Where cookies or similar technologies involve the processing of personal data, such processing is carried out in accordance with Regulation (EU) 2016/679 ("GDPR") and applicable Italian data protection legislation.

For further information regarding the identity of the Data Controller, purposes of processing, recipients, data retention and data subject rights, please refer to the Website's **Privacy Policy**.

10. CHANGES TO THIS COOKIE POLICY

Whitefluid Cylinders reserves the right to amend this Cookie Policy to reflect changes in applicable legislation, guidance issued by supervisory authorities or changes to the technologies used by the Website.

The most recent version will always be published on this Website.

Last updated: 5 October 2026