WEBSITE COOKIE & PRIVACY POLICY

Information on personal data processing and the use of cookies and other tracking technologies

Version 3.2 - updated 29 September 2026

This notice explains, in a transparent manner and for website users, the processing of personal data connected with the use of websites operated by Tubi Italflex S.r.l. Società Benefit and the use of cookies or similar technologies. It is provided pursuant to Articles 12 and 13 of Regulation (EU) 2016/679 (GDPR), Italian Legislative Decree No. 196/2003, as amended (Italian Privacy Code), in particular Article 122, and the Italian Data Protection Authority's Guidelines on cookies and other tracking tools of 10 June 2021.

1. Data Controller

Data Controller	Tubi Italflex S.r.l. Società Benefit - VAT/Tax ID 00755040151
Registered office and plant	Via Monte Nero 31/37, 20008 Bareggio (MI), Italy
Privacy contact	privacy@tubi-italflex.it
General contact	info@tubitalflex.com

2. Scope and covered domains

This policy applies to the web services provided by Tubi Italflex through the domains listed below, including domains that redirect to the main website. It does not apply to third-party websites that may be reached through external links, which are governed by their own privacy notices.

Domains covered by this notice	Domains covered by this notice
www.tubitalflex.com	www.divinghoses.it
www.tubi-italflex.it	www.frustepererogatori.com
www.tubiflessibili.com	www.frustepererogatori.it
www.tubi-flessibili.it	www.frustesub.com
www.tubirigidi.com	www.frustesub.it
www.tubirigidi.it	www.frustesubacquea.com
www.tubirigidisagomati.com	www.frustesubacquea.it
www.tubirigidisagomati.it	www.regulatorhoses.com
www.shapedrigidpipes.com	www.subacquea.cloud
www.diverhoses.com	www.safediving.blog
www.divinghoses.com	www.safediving.online
www.divinghoses.eu	www.tubisubacquea.it

3. Categories of personal data processed

- Browsing and technical log data: IP address, date and time of the request, requested resource, browser and device information, network technical data and information required for operation, security and service diagnostics. Such information may constitute personal data and is not generally described as anonymous.
- Data voluntarily provided: name, surname, company, role, e-mail address, telephone number, content of requests and any attachments sent through forms, e-mail or other channels available on the website.
- Recruitment data: information contained in CVs and documents voluntarily submitted for recruitment purposes.
- Statistical data and identifiers: information collected through cookies and similar technologies, within the limits described in the sections on ShinyStat and user preferences.

4. Purposes, legal bases and provision of data

Purpose	Legal basis / lawfulness condition	Provision
Website operation, security, abuse prevention, diagnostics and technical continuity.	Article 122(1) of the Italian Privacy Code for strictly necessary technologies. For any subsequent processing of personal data: Article 6(1)(f) GDPR, legitimate interests in security and proper delivery of the service.	Necessary for essential website functions.
Handling requests for information, assistance, contact and quotations.	Article 6(1)(b) GDPR where processing is necessary in order to take steps at the data subject's request prior to entering into a contract; otherwise, Article 6(1)(f) GDPR for relevant professional correspondence.	Necessary to handle and respond to the request.
Management of unsolicited job applications and CVs.	Article 6(1)(b) GDPR, within the scope of pre-contractual steps requested by the data subject, and Article 111-bis of the Italian Privacy Code. Any special categories of data are processed only where relevant and permitted by applicable law.	Optional; without the data the application cannot be assessed.
Aggregated website usage statistics through ShinyStat in a minimised analytics configuration.	Article 122 of the Italian Privacy Code: third-party analytics may be treated as equivalent to technical tools only when the conditions identified by the Italian Data Protection Authority are met, including IP minimisation, aggregate statistics and no incompatible combination or onward disclosure.	Consent is not required where all such conditions are met.
Any profiling, marketing, remarketing or analytics tools that are not equivalent to technical tools.	Prior consent under Article 122 of the Italian Privacy Code and, for personal data processing, Article 6(1)(a) GDPR.	Optional; refusal does not prevent normal browsing.

5. Cookies and other tracking technologies

Technical cookies and strictly necessary identifiers. These are used to transmit communications and provide essential website functions requested by the user. They do not require prior consent.

Analytics cookies. Analytics are not automatically treated as technical cookies. Where analytics are provided by a third party, equivalence with technical cookies requires aggregate statistics, prior minimisation of the IP address and no combination with further processing or onward disclosure to additional third parties, except as expressly permitted by the Italian Data Protection Authority.

Profiling or marketing cookies. Where such technologies are used, they are activated only after valid, freely given, specific, informed and revocable consent has been obtained.

6. ShinyStat - website analytics

The website uses ShinyStat by SevenData to obtain aggregated statistics on page usage and browsing flows. Tubi Italflex uses this information to understand, on a statistical basis, how its websites are used and to improve content, structure and usability. ShinyStat data are not used by Tubi Italflex to create individual user profiles or deliver behavioural advertising.

According to ShinyStat's published documentation, IP addresses are minimised before storage: the last octet is set to zero for IPv4 addresses and the last 80 bits are set to zero for IPv6 addresses; browsing logs are also aggregated into statistical reports. ShinyStat documents anonymised analytics cookies including the SN_xxx, SSCN_[N|UG|UW|UM]_xxx, SSC_xxx and SUUID_xxx families, as well as the OPTOUT cookie used to store exclusion from analytics measurement.

Use of ShinyStat without consent is limited to a configuration that meets the Italian Data Protection Authority's conditions for analytics that can be treated as equivalent to technical cookies. Any other functionality involving profiling or non-essential tracking is subject to prior consent where required by applicable law.

7. Google Tag Manager

The website uses Google Tag Manager as a technical tag-management tool. The tag manager enables scripts used on website pages to be managed centrally, but does not in itself provide an independent legal basis for further processing. Activation of any non-essential tags remains subject to the applicable lawfulness requirements and, where required, to the preferences expressed by the user through the consent-management system.

8. Cookie banner and preference management

Where the website uses technologies requiring consent, the cookie banner allows users to accept or reject non-essential cookies and, where available, to make granular choices by category. Closing the banner or simply continuing to browse is not, by itself, treated as valid consent.

Preferences can subsequently be changed using the dedicated cookie-management command or icon. In the absence of significant changes to the processing conditions or loss of the stored preference, the banner is not displayed again before at least six months have elapsed since it was previously shown, in line with the Italian Data Protection Authority's guidance.

9. Managing and disabling cookies through browser settings

Users may also manage, block or delete cookies through their browser settings. The available options may vary depending on the browser, operating system and version. For up-to-date instructions, please refer to the official support pages of the relevant browser providers, verified as of the date of this policy:

- Google Chrome: https://support.google.com/chrome/answer/95647?hl=en
- Mozilla Firefox: https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer
- Microsoft Edge: https://support.microsoft.com/en-us/edge/manage-cookies-in-microsoft-edge-view-allow-block-delete-and-use
- Apple Safari - macOS: https://support.apple.com/102564
- Apple Safari - iPhone/iPad: https://support.apple.com/105082
- Opera: https://help.opera.com/en/latest/web-preferences/

Disabling all or some technical cookies may affect the correct operation of certain website functions. Disabling non-essential cookies does not, as a rule, prevent normal browsing.

Browser-level settings apply to the browser and device on which they are configured and do not necessarily replace the preferences expressed through the website cookie banner or consent-management system. Deleting cookies may also remove stored preferences and may cause the banner to be displayed again where applicable.

10. Job applications and CVs

CVs voluntarily submitted are processed to assess the application and the possible establishment of an employment relationship. The information required by Article 13 GDPR is provided at the first useful contact following submission. Within the scope of Article 6(1)(b) GDPR and Article 111-bis of the Italian Privacy Code, processing does not require the data subject's consent. Only information relevant and necessary for recruitment purposes is used.

11. Retention periods

Category	Retention criterion
Technical and security logs	For the period necessary for security, diagnostics, service continuity and incident management, in compliance with applicable obligations.
Requests submitted by users	For the time necessary to respond to and manage the request; where a relationship is established, in accordance with the retention periods applicable to the contractual relationship and legal obligations.
CVs and job applications	For the time necessary for the recruitment process and, where no employment relationship is established, for a period consistent with the purpose of considering future professional opportunities, subject to data minimisation and storage limitation principles.
Technical cookies and preferences	For the duration required by the relevant function and, for consent preferences, for the time necessary to respect and document the user's choice.
ShinyStat analytics	In accordance with the technical durations provided by the service and the configuration used; Tubi Italflex uses the resulting information for aggregated statistical purposes.

12. Recipients and parties processing personal data

Personal data may be processed by authorised Tubi Italflex personnel and by service providers supporting hosting, maintenance, security, technical website management, analytics and related services. Depending on their actual role, external parties act as processors under Article 28 GDPR or as independent controllers. SevenData / ShinyStat is among the analytics providers used by the website. An updated list of categories of recipients and processors may be requested from the privacy contact.

13. International data transfers

Where a provider or sub-provider entails a transfer of personal data outside the European Economic Area, the transfer is carried out in accordance with Chapter V GDPR, on the basis of an adequacy decision or appropriate safeguards, including, where applicable, the European Commission's Standard Contractual Clauses and any necessary supplementary measures. Article 49 GDPR derogations are relied upon only where their legal requirements are met.

14. Security

Tubi Italflex implements technical and organisational measures appropriate to the risk in order to protect the availability, integrity and confidentiality of personal data, restrict access and manage security incidents. No Internet-based system can, however, be regarded as entirely risk-free.

15. Data subject rights and complaints

- access, rectification, erasure and restriction where the conditions of Articles 15-18 GDPR are met;
- data portability where Article 20 GDPR applies;

- the right to object to processing based on legitimate interests under Article 21 GDPR;
- withdrawal of consent at any time for processing based on consent, without affecting the lawfulness of processing carried out before withdrawal;
- the right to lodge a complaint with the Italian Data Protection Authority under Article 77 GDPR.

Requests may be sent to privacy@tubi-italflex.it The Data Controller responds within the time limits laid down by Article 12 GDPR.

16. Updates to this policy

This notice may be updated to reflect regulatory, technical or organisational changes affecting the web services and technologies used. The current version is published in the website privacy section.

Key references: Regulation (EU) 2016/679; Italian Legislative Decree No. 196/2003, as amended, in particular Articles 111-bis and 122; Italian Data Protection Authority Guidelines of 10 June 2021 on cookies and other tracking technologies; ShinyStat/SevenData privacy and technical documentation.