

INF-SGDP-05 WEB SITE AND WEB SERVICES PRIVACY POLICY

22/04/2021

Arts. 13 and 14 of EU Regulation n. 679 of 27 April 2016

WEB PRIVACY POLICY

<https://www.lacanellese.it>

1. Introduction

This Policy (hereafter 'Policy'), pursuant to Articles 13 and 14 of Regulation (EU) No 679 of 27 April 2016, is intended to illustrate how the company **La Canellese -s.r.l.**, - C.F. / P.IVA - hereafter also the "Company" or simply **La Canellese** -processes the personal data collected as users utilize the applications and services offered through this website. In this regard, we inform you that **La Canellese -s.r.l.**, as data **controller**, is the principal responsible for answering any questions, doubts or complaints you may have regarding this Policy or the processing of personal data.

Given the type of products processed, the content of the pages of the site is reserved exclusively for users who are at least 18 years of age. If you are an underage user, please leave the site immediately.

In case you, as a User and "interested party" need any clarification regarding the processing of your personal data, please contact us at the following contact details:

Address: Regione San Vito, 81/F - 14042 Calamandrana (AT) ITALY - Italy
Telephone: +39 0141 829614
PEC: lacanelleseufficio@pec.it
e-mail: privacy@lacanellese.it

Data Protection Officer (DPO): **NOT APPOINTED**

2. Which personal data do we process?

2.1 Data provided by the user. As a user you can provide us with data, including those that allow your identification - "personal data" - when you use our website, contact us or request our services. If we request such data, we will collect the data indicated in the relevant forms or pages. As a user you can choose to provide us with more information when you contact us or otherwise interact with us.

- a) We collect your personal data when you communicate with us in person, through our website, email, by phone or by any other means. For example, we collect your contact details and the details of our messages sent to you and received from you (including data about when you sent them, when we received them, and in some cases even where you sent them from).
- b) If you are a regular user of our website or wish to subscribe to specific services, you may want or need to create a Customer Account ("Account"). Information provided during account registration may include your name, email address, your company name, your business contact, phone numbers, and other contact details. If you sign up to create an Account, you will receive a unique password that will let you access your Account and use the services you choose.
- c) If you subscribe to our newsletter or other forms of direct communication from us, you may need to provide your name, email address or other specific data necessary from time to time.
- d) As a user you can also provide us - also through the appropriate forms available on the pages of the site - with personal data (such as the content of communications exchanged with us and contact details) in order to receive further information and/or services. The data will be processed by us exclusively for the purposes strictly connected to your request. Any refusal to provide such data may affect your ability to benefit from the service or receive the requested information.

2.2 The data that we collect automatically. When you visit our website, we may automatically collect some personal data implied in the network protocol. This information is not collected in order to be associated with identified data subjects, but by their very nature, they could, through processing and associations with data held by third parties, allow the identification of the users of the site.

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(a) This category of data includes the IP addresses or domain names of the computers used by users who connect to the site, the URL addresses of the requested resources, the time of the request and the method used to submit the request to the server. Also the name and size of the file obtained in response, the numeric code indicating the status of the response given by the server (good end, error, etc.) and other parameters related to the operating system and computer environment of the user such as the access data, browser type and version, types and versions of browser plug-ins, operating system and platform, data related to the visit, including the clickstream URL through and from our website, articles viewed or searched, download errors, time and duration of visits to certain pages and page interaction. We collect data automatically through the use of various technologies, including through "cookies" (see **paragraph 7** of this Policy).

(a) We also collect data through our security systems (e.g. Antivirus and Firewall) while browsing our web pages or using our cloud applications.

2.3 Data that we receive from other sources. We may receive data about you from other sources if you use any of the other services we provide on this website. We also work closely with third parties (including, for example, business partners, subcontractors of technical, payment and delivery services, analytics providers) and may receive data about you from them (including data that is publicly available).

2.4 Special categories of personal data. We may receive, from you or from other sources, data that are included in the category defined as "special personal data". This may occur, for example, following your voluntary sending of a message to one or more of the email addresses indicated on the website, or if you post a comment in the dedicated section.

3. How we process the data

3.1 We process the data we collect in order to give you the best possible experience when you access our website and interact with us. This includes the processing of your data, as a user, for the following purposes:

- a) to provide and improve our services:** we process your data to improve our services in order to best meet the needs of all our customers;
- b) creation and management of your Account:** we process your data for the creation of your Account, to create the profile on our systems and manage our relationship with you. We also process your data to communicate with you about your Account and our services;
- c) website administration:** we process your data to manage our website for internal operations, including troubleshooting, and to understand any errors encountered while using our website;
- d) security:** we process the data collected on our website to keep it secure and to manage and administer our IT systems;
- e) marketing:** We process your data to communicate with you and to keep you up to date on our activities and those of the companies you may be interested in, and to provide you and other users of our site with suggestions and recommendations about services that may be of interest.
- f) online advertising:** we use your data to measure and understand the effectiveness of the advertising we offer to you and other users, and to offer you relevant advertising. We also use your data to communicate with you through social media in order to develop our brand on those channels. We specify that the information that you will voluntarily release to us on social media will be used exclusively for the purposes indicated in this policy.

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g) recruitment: we accept online applications sent via email from people applying to work at our company. Our company will receive the data present in the application itself and in the documentation attached to it (including, if necessary, curriculum vitae and cover letter). We will only process your personal data for the purpose of continuing the selection process, evaluating and making a decision about your suitability for the role, communicating with you and carrying out any checks. We will always treat your data in compliance with legal obligations;

h) to make the necessary communications: we may process your data in order to make the necessary communications in response to requests that we are legally required to comply with, from law enforcement or judicial authorities or in defense of a right.

4. Why do we process your data?

4.1 Our processing of personal data is based on the following legal bases:

1. **a) the need to carry out contractual or pre-contractual obligations:** this includes, for example: (1) concluding the provision of our services; (2) ensuring access to restricted areas or cloud applications; (3) managing payments;
1. **b) the need to process in order to pursue our legitimate interests:** this includes, for example: (1) providing our services to our users; (2) ensuring that your account is adequately protected and ensuring that our website, network and IT infrastructure are secure and used appropriately; (3) better understanding how our services and website are used and making improvements; (4) study and analyze the desired services; (5) adapt our content to you; (6) ensure the safety of our business and partners; and (7) develop and maintain relationships with suppliers, partners, other companies and the people who work for them;
- c) the need to comply with a legal obligation:** for example, it may be necessary to disclose your data at the request of a competent governmental or judicial authority;
- d) when you have given your consent:** for example, we may request your consent when using technologies such as cookies.

4.2 For further information about our legitimate interests in the processing of personal data, please contact us through the information we have provided to you in section 1.

4.3 If as a user you are unable or unwilling to provide the personal data we need for the performance of the contract or for the fulfillment of a legal obligation, this may make it impossible to fulfill your request.

5. Who can access your data?

5.1 Your data will be processed by our employees and collaborators in their capacity as Data Controllers or by third-party service providers who are required or functional to providing the services offered through our website.

In this regard, we inform you that we may share your data with third parties when: (1) it is necessary to involve a third-party service provider in order to facilitate or extend our services; (2) when explicitly requested by you; (3) when required by a court order or any legal or regulatory obligation; (4) in order to enforce our contracts and, in the event of a legal complaint, if requested, the data may be transferred to defend us against such complaint, (5) to ensure the safety of our users, customers and third parties, and (6) to protect our rights and property and the rights and property of our customers and third parties.

5.2 Third parties are defined as subjects who provide us with a service or act as our representatives, such as, but not limited to, subcontractors (including their representatives), professional consultants, IT providers, database providers, disaster recovery backup specialists and services, email service providers and other service providers necessary to improve our services.

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5.3 Our suppliers and service providers will be required to comply with our data processing and security standards. The data we communicate, including your personal data, will be provided only in relation to and as far as strictly necessary for the performance of their function. They will not be allowed to use your personal data for purposes other than those indicated in this policy.

6. How to activate and deactivate direct marketing

6.1 We can use the data you provide for direct marketing purposes in order to send updates, newsletters or other communications that we believe may be of interest to you.

6.2 When required by law, the sending of commercial e-mails will take place only after obtaining your consent. In any case, we offer you the possibility to unsubscribe from each communication sent.

6.3 As a user you may object at any time to receiving commercial information from us by contacting us through the information we have provided to you in **section 1** or by selecting the unsubscribe option in our communications.

7. Cookies and other technologies

7.1 We collect data automatically through the use of "cookies". A cookie is a text file containing small amounts of data that a website can send to the browser, which can then be stored on your computer as a tag that distinguishes your computer but does not identify you. Some of our website pages use cookies to provide you with better service during subsequent uses of the website. You can set your browser to receive a notification before receiving a cookie, so you have the option to decide whether to accept it or not. You can also set your browser to disable cookies; however, if you do this, some of our websites may not work properly. We also use pixel tracking technologies in our emails to verify clicks on embedded links or images and the opening of newsletter emails. This data is collected in order to obtain statistical data on our website and emails, as well as to identify the characteristics and content preferred by each user, in order to send personalized information.

7.2 In order to allow better control of cookies on your part and to collect your consent where necessary, we have activated the Cookiebot service (<https://www.cookiebot.com>) offered by the Danish company CYBOT (<https://www.cybot.com/>), so for information on the specific cookies used on this website, we invite you to consult our Cookie Policy available on the website itself.

7.3 Additional information about cookies and how to protect your data is available at the following link:
<https://www.garanteprivacy.it/cookie>

8. Links to other websites and social media

8.1 When we provide links to other websites we do this only and exclusively for informational purposes. The other websites are beyond our control and this Policy does not apply to them. If you access other websites using the links we have provided, the operators of these sites may collect your data and use it in accordance with their Privacy Policy, which may differ from this Policy.

9. Data retention

9.1 Your data will not be stored for longer than is necessary for our commercial purposes or for the fulfillment of legal obligations.

9.2 We shall retain your data throughout the period in which your Account is active and for a period after the closing of the same; for example, in the event that it is necessary to fulfill the obligations imposed by law, such as the retention of data for civil purposes.

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9.3 We shall retain a copy of your contact details in case of opposition or refusal to receive direct marketing communications from us. We will add your data to our deletion list to make sure you no longer receive any marketing communication from us. In addition, we will not delete personal data if it is relevant to an investigation or dispute. The data will continue to be retained until such matters have been fully resolved.

10. User rights

10.1 In compliance with the applicable law, in certain circumstances and in relation to your personal data you may exercise the following rights. Before responding to any request, we reserve the right to verify the identity of the applicant and to seek further details related to the request.

- (a) **Right of access to personal data.** You have the right to obtain confirmation that we are or are not in the process of processing personal data concerning you and if this is the case, obtaining access to the personal data processed. You have the right to obtain a copy of the data subject to the processing. This right is applicable only if it does not lead to the rights and freedoms of others being harmed. On this point it should be stated that in the case of a request for further copies, we may charge you an expense contribution based on our administrative costs.
- (b) **Right to rectify, delete or limit the processing of personal data.** If you wish to rectify, delete or limit the processing of your personal data, we invite you to contact us through the information we have provided to you in section 1. It is your responsibility to ensure that you provide truthful, accurate and complete data and keep it up to date.
- (c) **Right to withdraw consent.** If you have given us consent to the processing of your data, you can revoke it at any time.
- (d) **Right to data portability.** If the processing is based on your consent or contract and is carried out by electronic means, you have the right to receive in a structured format, common use and readable by automatic device, personal data concerning you provided to us and you have the right to transmit such data to another data controller without hindrance on our part.
- (e) **Right of objection.** As a user you have the right to object to the processing of your data in certain circumstances. For example, you can benefit from this right if the processing is based on our legitimate interests (or those of third parties). You may dispute the validity of our legitimate interests, however, we may have the right to continue processing such personal data on the basis of our legitimate interests or when this is relevant in connection with legal actions, or the data is necessary for the establishment, exercise or defense of a right in court. You also have the right to object to the processing of your personal data for direct marketing purposes.
- (f) **Right to not be subjected to automated decision-making.**
- (g) **Compensation.** We also remind you that anyone who suffers material or immaterial damage caused by a violation of Regulation (EU) 2016/679 has the right to obtain compensation for the damages suffered from the data controller.
- (h) **Right to lodge a complaint with the supervisory authority.** Without prejudice to the possibility to contact our Company for the exercise of your rights related to processing, you can lodge a complaint with the competent independent administrative authority in the Member State of the European Union where you habitually reside, where you work, or where an alleged violation of the law on the protection of your personal data has occurred. In Italy you can file a complaint with the Supervisory Authority.

 Oversight authority for the protection of personal data
Switchboard: +39 06.696771 e-mail: garante@gdpd.it PEC certified email: protocollo@pec.gdpd.it Website: https://www.garanteprivacy.it
Forms for exercising your rights To exercise your rights with the Data Controller, you must fill in the following form: https://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/1089924 Remember that we must be able to identify you in order for you to exercise your rights.

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10.2 If you have an Account, you can access your personal data in our possession through the Account itself in order to obtain a copy of it as well as to correct, modify or delete inaccurate data. You also have the option to close your Account at any time.

11. Data security

11.1 We apply physical, technical and administrative measures in order to protect personal data under our control from unauthorized access, collection, use, disclosure, reproduction, modification or deletion. All data you provide is stored on secure servers.

11.2 If you have a password that allows you to access our services or websites, it is your responsibility to keep it secure and confidential.

12. International data transfers

12.1 Since the Internet is in itself a public domain, its use to collect and process personal data necessarily implies the transmission of data internationally. We generally store all your personal data that we collect through our website in your country (e.g. for European visitors, in the European Economic Area), however, it is possible that your personal data may be transmitted to third countries (where the laws on the protection of personal data may be different, for example in the United States).

12.2 In the case of transfer to third countries, we have implemented appropriate security measures and protections to ensure that your data is adequately protected in such third countries (for example, using standard contractual clauses). For more information on the security measures implemented, you can contact us through the information we have provided in section 1.

13. Modifications to the Policy Statement

13.1 This Policy Statement was updated most recently on **22/04/2021**.

14. Questions concerning this Privacy Policy

If you have any questions, concerns or complaints regarding this Privacy Policy, the management of your data or the exercise of your rights, do not hesitate to contact us by e-mail at: privacy@lacanellese.it or see our general policy on the processing of personal data **INF-SGDP-02** available at the following link: www.lacanellese.it/privacy

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Definitions:

«**processing**»: any operation or set of operations carried out with or without the aid of automated processes and applied to personal data or sets of personal data, such as collection, registration, organization, structuring, storage, adaptation or modification, extraction, consultation, use, communication by transmission, dissemination or any other form of provision, comparison or interconnection, limitation, erasure or destruction (art. 4.2 GDPR);

«**personal data** »: any information regarding an identified or identifiable natural person;

«**special data**»: personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, as well as genetic, biometric data aimed at uniquely identifying a natural person, data relating to the health or sexual habits or sexual orientation of the person (art. 9 GDPR);

«**judicial data**»: personal data referring to criminal convictions and felonies (art. 10 GDPR);

«**interested party**»: the identified or identifiable natural person to whom personal data refers;

«**GDPR**» or «**Regulation**»: EU Regulation 2016/679 (General Data Protection Regulation) on personal data protection;

«**risk**»: descriptive scenario of an event and its consequences, which are assessed in terms of their severity and probability of threatening rights and freedoms.

«**limitation of processing**»: the marking of personal data stored with the aim of limiting their processing in the future;

«**profiling**»: any form of automated processing of personal data consisting in the use of such personal data to assess certain personal aspects relating to a natural person, in particular to analyze or predict aspects concerning the professional performance, economic situation, health, personal preferences, interests, reliability, behavior, location or movements of that natural person;

«**pseudonymization**»: the processing of personal data in such a way that personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is stored separately and subject to technical and organizational measures intended to ensure that such personal data is not attributed to an identified or identifiable natural person;

«**archive**»: any structured set of personal data accessible according to specific criteria, regardless of whether that set is centralized, decentralized or allocated in a functional or geographical way;

«**data controller**»: the natural or legal person, the public authority, the service or other body which, individually or together with others, determines the purposes and means of processing personal data; where the purpose and means of such processing are determined by Union or Member State law, the data controller or the specific criteria applicable to his designation may be established by Union or Member State law;

«**controller**»: the natural or legal person, public authority, service or other body that processes personal data on behalf of the data controller;

«**receiver**»: the natural or legal person, the public authority, the service or another body receiving the communication of personal data, whether or not they are third parties. However, public authorities that may receive communication of personal data in the context of a specific investigation in accordance with Union or Member State law shall not be considered recipients; the processing of such data by those public authorities complies with the applicable data protection rules according to the purposes of the processing;

«**third party**»: the natural or legal person, the public authority, the service or other body other than the data subject, the data controller, the controller and the persons authorized to process personal data under the direct authority of the data controller or the controller;

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«**consent of the data subject**»: any manifestation of free, specific, informed and unequivocal will of the data subject, by which he expresses his consent, by means of an unequivocal declaration or positive action, that personal data concerning him are subject to processing;

«**violation of personal data**»: a security breach that accidentally or unlawfully involves destruction, loss, modification, unauthorized disclosure or access to personal data transmitted, stored or otherwise processed;

«**oversight authority**»: the independent public authority set up by a Member State;

«**international organization**»: organizations and bodies governed by public international law subordinate to it or any other body set up by or on the basis of an agreement between two or more States.

«**FORM**»: in computer science, this term is used to refer to the interface of an application that allows the client/user to enter and send the web server one or more bits of data freely entered by the same; descriptively, it is a "card to be filled in" for data collection.

«**Clickstream URL**»: Clickstream is the analysis of users' browsing flow. It allows you to monitor how users browse, purchasing processes, reaction to advertisements, etc.