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# **PRIVACY & COOKIES POLICY**

Information pursuant to Articles 13 and 14 EU Reg. 2016/679"

This page describes how the site is managed with regard to the processing of personal data of users who consult it or use the services it offers.

This page explains the processing of personal data carried out with regard to the services made available via the web through:

- > the website https://www.acffiorentina.com/
- > the domain https://inviola.acffiorentina.com/
- > the website https://fiorentinababy.it/
- > the APP Fiorentina Official

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# THE "OWNER" OF THE PROCESSING (who decides why, how and to whom to have the data processed)

As a result of consulting this site and using the services it offers, data relating to identified or identifiable persons may be processed.

In addition to browsing data, information may, for example, be collected:

- > on the occasion of a contact request;
- > from the use of other services through the Platforms made accessible by the site or the InViola APP, for which please refer to the relevant section of this document;
- > through the use of cookies or other technologies as outlined below

The data controller in question is ACF FIORENTINA S. r. l.: based in Viale M. Fanti no. 4 - Florence,

The Data Controller has appointed a Data Protection Officer who is assigned to oversee compliance with data protection regulations whose contact details are: rpd@acffiorentina.it

### **RIGHTS OF INTERESTED PARTIES**

With respect to the processing referred to herein, the data subjects (users of the site) have the right:

- > to request from the data controller access to and rectification or erasure of personal data or restriction of the processing of personal data concerning him or her and to object to their processing;
- > if the processing is carried out by automated (computerized) means and on the basis of his or her consent, to receive in a structured, commonly used and machine-readable format the personal data concerning him or her and/or to obtain their direct transmission to another data controller, if technically feasible;
- > to revoke their consent at any time (without affecting the lawfulness of the processing based on the consent before revocation), of course this is for processing carried out on the basis of this assumption;
- > to lodge a complaint with a supervisory authority: Garante per la protezione dei dati personali Piazza di Monte Citorio n. 121 00186 ROMA Fax: (+39) 06.69677.3785 Telephone switchboard: (+39) 06.696771 E-mail: garante@gpdp.it certified mail protocollo@pec.gpdp.it.

More information at the end of this policy.

In order to assert their rights, the interested party may contact ACF FIORENTINA S.r.l. by means of the e-mail address infoprivacy@acffiorentina.it **or by** sending a registered letter to the address specified above, or by means of the number + 055571259 specifying to the operator the nature of the request or the problem highlighted and bearing in mind that it will not be possible to respond to requests received by telephone where there is no certainty as to the identity of the applicant.

# NAVIGATION DATA - data processed in connection with the visit to the site

The computer systems and software procedures used to operate this website acquire, in the course of their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols.

This information is not collected to be associated with identified data subjects, but by its very nature could, through processing and association with data held by third parties, allow users to be identified.

This category of data includes, for example, the IP addresses or domain names of the computers used by users connecting to the site, the URI (Uniform Resource Identifier) notation addresses of the requested resources, the time of the request, the method used in submitting the request to the server, the size of the file obtained in response, the numeric code indicating the status of the response given by the server (successful, error, etc.) and other parameters related to your operating system and computing environment, such as browser type and version, browser plug-in types and versions, mobile device identifier (IDFA or AndroidID) and other parameters related to your operating system and computing environment.

These data, in the absence of specific consent to processing for further purposes, are used for the sole purpose of obtaining anonymous statistical information on the use of the site and to monitor its proper functioning.

The data could be used to ascertain responsibility in the event of hypothetical computer crimes to the detriment of the site, and only in that case can specific procedures aimed at identifying the author be activated.

The legal basis for the processing of these data is the legitimate interest of the holders consisting of the protection of data security, smooth operation of the site and improvement of service standards.

Personal data are processed by automated tools for the time strictly necessary to achieve the purposes for which they were collected. The processing related to the web services of this site are handled by personnel appointed by the Data Controller as well as by external subjects, appointed as data processors (ART. 28 EU REG. 2016/679), who are entrusted with the technical management and maintenance of the site and its information systems. Specific security measures are observed to prevent data loss, illicit or incorrect use and unauthorized access.

No data from the web service is disseminated.

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The personal data provided by users who submit requests for informative material to be sent to them (newsletters, answers to questions, etc.) are used for the sole purpose of performing the service or provision requested and are communicated to third parties only if this is necessary for that purpose.

### DATA VOLUNTARILY PROVIDED BY THE USER

Apart from what has been specified above, the user is free to provide the personal data requested in the course of browsing to solicit the sending of informative material or other communications. Failure to provide them may result in the impossibility of obtaining what has been requested.

When the user visits a part of the Site or activates a feature made available by the Fiorentina Official APP that involves the collection of personal data, he or she is presented with a link to this information document again and is asked to attest that he or she has read it and, if necessary, a consent.

The optional, explicit and voluntary sending of electronic mail to the addresses indicated on this site or reachable through the APP entails the subsequent acquisition of the sender's address, which is necessary to respond to requests, as well as any other personal data included in the missive which, unless otherwise duly communicated, will be kept for the time necessary to fulfill the requests.

Below are made available specific disclosures referring to pages set up for particular on-demand services or through which additional personal data can be acquired.

# PROCESSING RESULTING FROM A REQUEST FOR CONTACT (CONTACT AREA) OR REGISTRATION

- 1. Personal data voluntarily conferred by the data subject through the contact area, request forms or e-mail addresses made available on the site are processed by mainly automated means for:
  - 1.1. ensure a certain and timely response and fulfill the data subject's own requests (legal basis for processing: legitimate interest and consent of the data subject in case of "special" personal data);
  - 1.2. Fulfillment of obligations arising from EU laws, rules and regulations; fulfillment of provisions issued by the Judicial Authority, (legal basis for processing: coinciding with the purpose);
  - 1.3. feed the system of acquiring knowledge of the public through statistical analysis, carried out through anonymized and aggregated data, useful for the verification, improvement and thus design of a service that is increasingly efficient and adequate to the demand, , (legal basis of processing: legitimate interest of the holders coinciding with the purpose).
- 2. The contact details, postal and e-mail addresses provided may be used to send courtesy communications and/or informational material/offers related to proposed products and services provided by the Data Controllers, this of course with the consent of the data subject, this also via sms or other communication platforms accessible through the address(es) provided, such as whatsapp. It is understood that the interested party will still have the right to object to the aforementioned processing at any time. In this regard, it is specified that, also by giving consent, the interested party has the possibility to express his or her choices about the channels that can be used to send such communications having the possibility to insert even only one of the contact details requested in the form (legal basis of the processing: legitimate interest of the holders consisting in the promotion of their products/services and consent of the interested party).
- 3. Always with the consent of the person concerned, the data he or she provided and acquired in the course of browsing:
  - 3.1 may be processed to generate a profile based on your preferences and the ways in which you interact with the site. In particular, in order to better understand your tastes and interest in our services and communications, we may examine including through the use of automated systems the information you provide when submitting requests or filling out forms, your interest with respect to the communications and newsletters we send, how you use our Platforms, and your interest in our social channels (e.g., Facebook). Your profile may be enriched with statistical information acquired in a completely lawful manner from other freely accessible sources: for example, in relation to your area of residence (such as demographic information, georeferencing data, etc.) or the electronic tools you use to interact with us.

All this is done in order to improve products and services provided, and, most importantly, to proactively identify the interests and needs of users, enabling us to send offers and communications that are sure to be of interest and better target the activities mentioned in paragraph 2 above

Consent for this "profiling" activity is also, of course, optional. It should also be noted that no automated decision-making process is adopted with the effects referred to in Art. 22 of EU Reg. 2016/679

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Obviously, all consents, when requested, only absolutely optional and the user may revoke them at any time, without affecting the legitimacy of the processing carried out by the Controller until the moment of revocation itself.

- 4. The data may be processed by sales staff, computer systems maintenance personnel whose task is to ensure the functionality of the systems, data security and backup operations, other designated personnel within the limits of their assigned tasks and the provisions of company procedures, and other individuals who provide services for purposes auxiliary to the fulfillment of the data subject's requests, also within the limits strictly necessary to carry out their tasks;
- 5. Data may be disclosed or made available:
  - to subjects who can access the data by virtue of a provision of the law, regulation or EU legislation, within the limits provided by these rules,
  - other related companies (subsidiaries parent companies) always for current "administrative accounting purposes" related to the fulfillment of the requests of the person concerned
  - to other entities that provide services for purposes related to the fulfillment of the data subject's
    requests, to the extent strictly necessary to perform their tasks business partners, whose cooperation is
    necessary for the provision of the requested services The Business Partners will operate as autonomous
    data controllers and in compliance with their respective privacy notices, which will be made available
    by them
- 6. Personal data will also be transferred to entities located outside the European Union to the country where the data subject resides or is located only if necessary to fulfill his or her requests and in compliance with applicable regulations.

When filling out the forms, fields whose completion is mandatory are indicated with an asterisk, in the absence of the required data it will not be possible to fulfill the requests of the interested party.

If, at the time of the contact request, the data subject has to communicate special categories of data (such as: personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as dealing with genetic data, biometric data intended to uniquely identify a natural person, data relating to the health or sex life or sexual orientation of the person) a specific consent to their processing may be required, in the absence of which it may be impossible to process the data subject's requests.

### InViola area registration procedure

On the website, as on the APP you can proceed with registration to the InViola area.

Registration completes, to all intents and purposes, participation in the InViola program and provides access to one's personal area where the interested party can:

- > verify and update their data;
- > change their choices about the consents given to ACF FIORENTINA;
- > check the count of accumulated InViola points;
- > obtain all services and benefits related to the InViola Card, if not already owned;

for this reason, registration follows two different procedures depending on whether or not the person is already in possession of the InViola Card as follows:

- 1. If the user already has an InViola Card, it will be sufficient to enter its number to complete the procedure to access their reserved area, which was already created when the Inviola Card was issued;
- if the user is NOT already an InViola Card holder, registration is, in fact, equivalent to the application for the InViola Card itself, and compulsorily requires adherence to the Sweepstakes and acceptance what is stated in the InViola Card Rules and the Sweepstakes Rules.

As a guarantee for the user, the registration process compulsorily involves the entry of a confirmation code that will be sent to the communicated e-mail address, which will be the same one used for the password recovery procedure, for this reason it is necessary that the user, for his own protection, enter on the forms addresses that are in the exclusive availability (avoiding, for example, the entry of company e-mails).

# Some important notices:

- > Registration through the website is reserved for people over 18 years of age, remaining firm that minors can also apply for the inViola Card by filling out the relevant forms at the ACF FIORENTINA ticket office.
- > Unless expressly delegated, current legal regulations, particularly regarding privacy, do not allow third persons to fill in fields or send information in place of the person interested in making the registration.
- > We remind you again to enter contact details that are in the exclusive availability of the person making the registration (avoiding, for example, the inclusion of company e-mails) this is because ACF FIORENTINA will be

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able to send communications addressed exclusively to the holder of the registration/InViola Card, including those containing his/her personal data.

Keep in mind that with the password set by him, the User will be able, among other things, to access his data and perform operations that may correspond to an economic value, it is recommended, therefore, to choose a password of adequate complexity (it must not contain references easily traceable to the User, also resorting in its formulation to special characters, numbers, punctuation or increasing its length at discretion, which can not be less than 8-10 characters) and to guard it carefully, changing it periodically or whenever there is a suspicion that its confidentiality is compromised.

### Fiorentina Official APP

The Fiorentina Official APP is in effect an interface that allows the user to:

- > get information about the world of ACF Fiorentina,
- > subscribe to the newsletter;
- > enjoy all services and access all content offered on the site;
- > register in the InViola world for:
  - -obtain all services related to the InViola Card;
  - -participate in all of our loyalty program initiatives, sweepstakes, point collection, etc;
  - for this reason, registration requires acceptance of specific regulations.

The Fiorentina Official APP does not acquire any information from the User's terminal unless instructed by the User. In order to allow the APP to access or send any content (any type of file external to the app), always and only at the command of the User, confirmation is required about the possibility for the APP to access such content; in this regard, please note that this request will be proposed once the first time you activate a service that assumes access to content or functionality of the device; if the user wishes to change his choice, he can do so through the settings of the device itself.

### **NEWSLETTER SUBSCRIPTION**

Personal data voluntarily given by the data subject by subscribing to the Newsletter:

- > are processed by mainly automated means for the sole purpose of fulfilling the requests of the data subject himself, who has the right to stop such processing at any time;
- > may be processed by communications and marketing staff, information systems maintenance personnel whose task is to ensure the functionality of the systems, data security and backup operations, other employees within the limits of the assignments received and the provisions of company procedures, and other individuals who provide services for purposes auxiliary to the fulfillment of the data subject's requests, to the extent strictly necessary to carry out their tasks;
- > may be communicated or made available:
  - to subjects who can access the data by virtue of a provision of the law, regulation or EU legislation, within the limits provided by these rules;
  - to other entities that provide services for purposes related to the fulfillment of the data subject's requests, to the extent strictly necessary to carry out their tasks;
  - to associated companies (subsidiaries parent companies) always for current administrative accounting purposes related to the fulfillment of the requests of the person concerned.

### **E-SHOP AREA**

The link corresponding to the E-SHOP area refers to the website <a href="http://www.fiorentinastore.com">http://www.fiorentinastore.com</a> independently managed by EPI SrI with headquarters at Via Magistretti 10, 10128, Milan - a company to which the online sale of official ACF FIORENTINA products is fully entrusted.

In any case, it is specified that the data given to EPI on the site managed by it by the user at the time of the purchase request will also be acquired by ACF FIORENTINA and will be processed as indicated in the information made available to the public and according to the consents given by the interested party.

# DATA RETENTION

The data disclosed, unless otherwise specified by the data subject or further needs duly communicated, will be kept for as long as necessary to fulfill the data subject's requests and comply with legal requirements.

If the data subject had a contractual relationship with the Controller or was registered in the InViola program, the data will be retained, if relevant to it, for the duration of the contract or registration, after which the retention will be continued only if obligatory by law and in accordance with the rules on the retention of administrative records or



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as indicated in the information disbursed at the time of the establishment of the contractual relationship and registration.

Contact information for which consent has been given to send commercial communications will be retained until 18 months after the last mailing or when consent is withdrawn by the data subject.

### **COOKIE POLICY**

This Section describes the characteristics of the cookies in use.

Legal bases of the treatments that originate with the use of cookies are:

- > for technical cookies (necessary for the proper functioning of the site and to enable navigation): the legitimate interest of the owner coinciding with the purpose of the cookies;
- > for any profiling cookies: the consent of the user manifested in the manner described in the aforementioned provision of the Guarantor, i.e., continuing to browse after having certainly read the notice displayed on the banner that appears as soon as you first land on the site.

### WHAT COOKIES WE USE ON OUR SITES

### Below we list cookies divided into two macro-categories:

- > "TECHNICAL" and functionality COOKIES: Technical cookies are those used for the sole purpose of "carrying out the transmission of a communication over an electronic communications network, or to the extent strictly necessary for the provider of an information society service explicitly requested by the subscriber or user to provide such service" (see Article 122(1) of the Code). They are not used for any further purposes. They can be divided into navigation or session cookies, which ensure the normal navigation and use of the website (allowing, for example, to make a purchase or authenticate to access restricted areas); analytics cookies, assimilated to technical cookies where used directly by the operator of the site to collect information, in aggregate form, on the number of users and how they visit the site functionality cookies, which allow the user to navigate according to a series of criteria selected by him (for example, language, products selected for purchase) in order to improve the service rendered to the same. Users' prior consent is not required for the installation of such cookies;
- > PROFILATION COOKIES: Profiling cookies are aimed at creating profiles related to the user and are used in order to send advertising messages in line with the preferences expressed by the user when browsing the web

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# The cookies used on www.acffiorentina.com

"TECHNICAL" analytics and functionality COOKIES				
cookie name	dwell time on the user's terminal	What is it for	SOURCE (for third-party cookies)	
COOKIE ACCEPTED	1 year	records taking note of cookie information and any consent	//	
_ga	2 years	Google Analytics tracking cookie used to distinguish whether the user previously accessed the siteContains no personal information	https://policies.googl e.com/privacy	
_ga_EKC655Q48G	2 years	Google Analytics cookie used to get an overview of site visitors		

PROFILING COOKIES
NONE

# COOKIES USED At inviola.acffiorentina.comand https://fiorentinababy.it/

	"TECHNICAL"	analytics and functionality COOKIES	
cookie name	dwell time on the user's terminal	What is it for	SOURCE (for third-party cookies)
PHPSESSID	SESSION	session identifier safety in navigation	//

PROFILING COOKIES
NONE

# **COOKIES - IN-DEPTH**

# What are cookies and how they work

Cookies are small text files that sites visited by a user send to the user's terminal. These files are saved and stored in the user's browser folders, and then transmitted back to the same sites on the next visit.

Through cookies, servers receive information that is re-read and updated every time the user returns to the site. Cookies contain the following information:

- Indication of the server or domain from which they were generated;
- Their duration (or expiration date);
- A unique identification code;
- a unique value.

In any case, cookies cannot cause damage to the user's computer.

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#### What cookies are used for

Cookies are intended to make it easier to browse the site and improve the browsing experience. They also provide the site operator with information, most often aggregated and anonymous, about users' browsing in order to obtain statistical data on site use.

Also, some cookies collect and store on the user's device information about what the user has done on the sites; This information can be used:

- > to recognize the user (or, rather, the device used by the user) by re-proposing even during subsequent visits the settings they requested/chosen previously;
- > to analyze the preferences manifested by the user during browsing by creating a profile used essentially to display or send personalized sales promotion messages, that is, which are in line with the interests inferred from the user's browsing.

### Types of cookies

Cookies can be divided into the following categories: Technical cookies and Profiling cookies.

> "TECHNICAL" and functionality COOKIES: Technical cookies are those used for the sole purpose of "carrying out the transmission of a communication over an electronic communications network, or to the extent strictly necessary for the provider of an information society service explicitly requested by the subscriber or user to provide such service" (see Article 122(1) of the Code).

These allow the site to function optimally, but you may choose not to allow their use by changing the settings of the browser you are using. Disabling these cookies may prevent access to certain features of the site. Within the scope of Technical Cookies it is possible to distinguish:

# • Browsing cookies

They are necessary to navigate within the site using all of its features (such as session maintenance and access to restricted areas) and do not collect information to be used for profiling or commercial purposes. Without these cookies, it would not be possible to provide the services requested.

### • Functionality cookies

They allow the user to navigate based on a selected set of criteria (e.g., site language), thereby facilitating navigation. The information collected through such cookies is anonymous.

The prior consent of users is not required for the installation of technical cookies, although the obligation to provide this information remains. The acquisition and processing of data resulting from the use of technical cookies is necessary for the correct consultation of the site. In case of opposition by the user, the user will not be able to see the site correctly and in its entirety.

The legal basis for the use of technical cookies remains the legitimate interest of the owner consisting in the smooth operation of the site and improvement of the services rendered

#### **Cookie analytics**

They are assimilated to technical cookies where they are used directly by the site operator to collect information in aggregate form about the number of users and how they visit the site. They are used to optimize the management of the site. The information collected by these cookies does not identify the user.

#### > PROFILING COOKIES

As mentioned above, these cookies enable the acquisition of information related to the preferences and ways in which the user interacts with the site and are used to assign a profile to the user (actually most of the time to the terminal used by the user) in order to optimize at the highest level the effectiveness and usability of the site also by customizing the promotional/advertising messages displayed to the individual user.

Such cookies can only be installed on users' terminals when they have been previously and adequately informed and have provided consent which, as provided for in the measure cited in the introduction can also be manifested simply by continuing browsing after reading the notice displayed the first time the site is accessed.

The legal basis for the use of profiling cookies is the consent of the interested party (user of the device used for browsing) manifested in the manner provided by the already mentioned general provision of the Guarantor for the protection of personal data "Identification of the simplified procedures for information and acquisition of consent for the use of cookies" of May 8, 2014 [. https://www.garanteprivacy.it/web/guest/home/docweb/docweb-display/docweb/3118884].

### **DISABLING AND DELETING COOKIES**

The user's privacy is essentially guaranteed by the fact that he or she can AT ANY TIME:

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configure your browser to accept all cookies, reject them all, or receive a warning note the moment one is sent.

> delete one, some, or all cookies.

Each browser has its own specific settings, so please remember to consult the "Help" section of the browser you are using for more information on how to change its preferences.

Most browsers are initially set to accept cookies automatically. In the case of different devices (e.g., computers, smartphones, tablets, etc.), the User will need to ensure that each device's browser settings are configured to reflect their cookie preferences.

Below are some links to the online documentation of major browsers:

Internet Explorer: <a href="https://support.microsoft.com/en-us/help/17442/windows-internet-explorer-delete-">https://support.microsoft.com/en-us/help/17442/windows-internet-explorer-delete-</a>

manage-cookies

https://support.microsoft.com/en-us/help/17479/windows-internet-explorer-11-change-

security-privacy-settings#ie=ie-11

Mozilla Firefox <a href="http://support.mozilla.org/it/kb/Attivare%20e%20disattivare%20i%20cookie">http://support.mozilla.org/it/kb/Attivare%20e%20disattivare%20i%20cookie</a>

Google Chrome <a href="https://support.google.com/chrome/answer/95647?hl=it&hlrm=en">https://support.google.com/chrome/answer/95647?hl=it&hlrm=en</a>

Safari iOS (iPhone, iPad, iPod touch): http://support.apple.com/kb/HT1677?viewlocale=it

### **Microsoft Internet Explorer**

1. Click on "Tools" at the top of the browser window.

- 2. Select "Internet Options" and then click on the "Privacy" tab.
- 3. To enable cookies, the Privacy level must be set to "Medium" or below. To disable them, the Privacy level must be set above "Medium."
- 4. To enable the "third-party cookies" option, select, in the "Privacy" section the "Advanced" button, put a check mark under "Replace automatic cookie handling," confirm, under "Third-party cookies," the default "Accept" option and save by clicking OK. Alternatively, where you do not want to allow third-party cookies, select "Block" and confirm by clicking OK. In case you want to accept or block third-party cookies from time to time, select the "Ask for confirmation" option and click OK.

# **Mozilla Firefox**

- 1. Click on "Tools" at the top of the browser window and select "Options."
- 2. Select the "Privacy" icon and in the "History" section, put a check mark next to "Accept cookies from sites" to accept them. To prevent installation of cookies, including third-party cookies, you must uncheck that option.
- 3. To allow the installation of third-party cookies, you must have selected "Accept cookies from sites" (see previous point) and select, under "Accept third-party cookies" the "Always" option that appears via the drop-down menu. In case you do not want to accept cookies from third parties, you must select, in the same drop-down menu, the option "Never".

#### **Google Chrome**

- 1. Click on the Chrome menu icon and Select "Settings."
- 2. At the bottom of the page, click on "Show advanced settings."
- 3. In the "Privacy" section, click on "Content Settings."
- 4. To enable or disable cookies:
  - a. To enable cookies, select "Allow local data storage."
  - b. To disable cookies, select "Prevent sites from setting data."
  - c. To prevent access to cookies from third parties, also select the "Block cookies from third parties" option in the same Privacy section.
- 5. Click Finish to save.

# Safari (iPhone, iPad, iPod touch)

- 1. Click on the "Settings" icon, select "Safari"
- 2. Select "Privacy and Security," followed by "Block Cookies."
- 3. Select, in this scope, the "Always block" option if you want to prevent the installation of cookies.

More information on cookies can be found at: www.allaboutcookies.org

# Permanent deactivation of profiling cookies

# If you are using Internet Explorer 9 or higher

- 1. Click on "Tools" at the top of the browser window
- 2. Select "Internet Options" and then click on the "Privacy" tab
- 3. Set the Privacy level to "High."

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### If you are using Firefox 5 or higher

- 1. Open the "Options" menu and click the "Privacy" tab
- 2. Select the option "Require sites to do no tracking"

# If you are using Google Chrome

- 1. Open Chrome and then the "Settings" menu
- 2. Click on "Show advanced settings" at the bottom of the page.
- 3. Under "Privacy," in the "Submit a request" box, put a check mark under "Do not track with your browsing traffic."

# **Disabling COOKIES ON MOBILE DEVICES**

Just as with browsers on computers, browsers on mobile devices allow you to change the privacy configuration or settings to disable or delete cookies.

If you wish to change your privacy settings, follow the instructions provided by the browser developer for your mobile device.

The following are valid links for some browsers:

Chrome Mobile
Opera Mobile
Windows Phone

https://goo.gl/fG1K8t
https://goo.gl/f0XME
http://goo.gl/Nzr8s7
https://goo.gl/xsSg56

#### THIRD-PARTY COOKIES

While browsing a site, cookies on the same site, but from other sites and managed by third parties, may be installed in the user's browser folders.

This happens because there may be elements on the Site such as, for example, images, maps, sounds, specific links to web pages on other domains that reside on servers other than the one on which the requested page is located. In other words, said cookies are set directly by website operators or servers other than the Site. These third parties could theoretically set cookies while you are visiting the Site and thus obtain information related to the fact that you have visited the Site.

In this case, the owner of the visited site acts only as a technical intermediary between the user and these other sites.

- Google's privacy policy for the Google Analytics service is available at http://www.google.com/intl/it\_ALL/analytics/learn/privacy.html;
- Google's privacy policy is available at http://www.google.com/intl/it/privacy/privacy-policy.html;

To disable third-party cookies, please refer to the instructions in the previous sections.

For more information you can visit the following website: www.youronlinechoices.com/it/.

If the User chooses not to give consent to the storage of third-party cookies, the User will only be able to use the functions of the Site, which do not require the storage of such cookies.

Regarding the ownership of the processing carried out through these third-party cookies, please refer to the respective disclosures and cookie policies reached from the links proposed above and in the following paragraphs.

# **USER RIGHTS - IN-DEPTH**

# **Right of access**

The data subject has the right to obtain confirmation from the data controller as to whether or not personal data concerning him or her are being processed and, if so, to obtain access to the personal data and the following information:

- (a) the purposes of processing;
- (b) the categories of personal data in question;

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- (c) the recipients or categories of recipients to whom the personal data have been or will be disclosed, particularly if recipients in third countries or international organizations and, if so, the existence of appropriate safeguards;
- (d) when possible, the expected period of retention of personal data or, if this is not possible, the criteria used to determine this period;
- (e) the existence of the data subject's right to request from the data controller the rectification or erasure of personal data or the restriction of the processing of personal data concerning him or her or to object to their processing;
- (f) the right to file a complaint with a supervisory authority;
- (g) if the data are not collected from the data subject, all available information on their origin;
- (h) the existence of any automated decision-making process, including profiling, which produces legal effects concerning him or her or significantly affects him or her in a similar way, and, at least in such cases, meaningful information about the logic used, as well as the importance and expected consequences of such processing for the data subject.

### Right of rectification

The data subject has the right to obtain from the data controller the rectification of inaccurate personal data concerning him or her without undue delay.

# **Right of cancellation**

The data subject shall have the right to obtain from the data controller the erasure of personal data concerning him or her without undue delay, and the data controller shall be obliged to erase the personal data without undue delay if one of the following grounds exists:

- (a) personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- (b) the data subject withdraws the consent on which the processing is based and there is no other legal basis for the processing;
- (c) the data subject objects to the processing, and there is no overriding legitimate reason for processing;
- (d) personal data have been processed unlawfully;
- e) personal data must be deleted in order to comply with a legal obligation under European Union law or the law the member state to which the data controller is subject;

# Rights to limitation of processing

The data subject has the right to obtain from the data controller the restriction of processing when one of the following cases occurs:

- (a) the data subject disputes the accuracy of personal data, for the period necessary for the data controller to verify the accuracy of such personal data;
- (b) the processing is unlawful and the data subject objects to the deletion of personal data and instead requests that their use be restricted;
- (c) although the data controller no longer needs them for the purposes of processing, the personal data are necessary for the data subject to establish, exercise or defend a right in court;
- (d) the data subject has objected to the processing, pending verification as to whether the data controller's legitimate reasons prevail over those of the data subject.

### Right of opposition

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The data subject has the right to object at any time to the processing of personal data concerning him or her carried out for direct marketing purposes, including profiling insofar as it is related to such direct marketing.

### Right to data portability

The data subject shall have the right to receive in a structured, commonly used and machine-readable format personal data concerning him or her that have been provided to a data controller and shall have the right to transmit such data to another data controller without hindrance by the data controller to whom he or she has provided them if:

- (a) the processing is based on consent or a contract; and
- (b) the processing is carried out by automated means.

When exercising his or her rights with regard to data portability, the data subject has the right to obtain direct transmission of personal data from one data controller to another, if technically feasible.

Some Definitions

Personal data:: Any information relating to an identified or identifiable natural person

"Particular" personal data NEED MORE PROTECTION AND PARTICULAR ATTENTION, such are personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as genetic data, biometric data intended to uniquely identify a natural person, data relating to a person's health or sex life or sexual orientation (Art. 9 of EU Reg. 2016/679)

Processing means any operation or set of operations, performed by any means or methods and applied to personal data or sets of personal data, (such as collecting, recording, organizing, structuring, storing, adapting or modifying, extracting, consulting, using, communicating by transmission, dissemination or any other form of making available, comparing or interconnecting, limiting, erasing or destroying)

Data Subject: The natural person to whom the personal data refer.

**Controller:** the natural or legal person, public authority, department or other body which, individually or jointly with others, determines the purposes and means of the processing of personal data

**Data Processors** (appointed pursuant to Art. 28 EU Reg. 2016/679): the natural or legal person, public authority, service or other body that processes personal data on behalf of the Data Controller

**Legal basis for processing:** the normative principle under which the personal data processing described can be carried out, in many cases coinciding with the stated purpose.

In case of any discrepancy between the meanings of any translated versions of this Privacy Policy, the meaning of the Italian language version shall prevail