

# PRIVACY POLICY

## Information provided pursuant to Reg.EU 2016/679 (GDPR), Art.13

For Borgonovo Group, personal data constitute an extremely valuable asset which should be protected, by implementing procedures and conduct set to ensure they are safeguarded. Transparency vis-à-vis the data subjects therefore constitutes a primary goal, which is pursued through the use of effective communication tools and aimed at making available to those concerned basic information about the processing of their data.

### General Information

The Data Subjects (Art.4, c1 GDPR) are informed of the following general profiles, valid for all areas of treatment:

- all the data of the subjects with whom we interface are treated in a lawful, correct and transparent manner, in compliance with the general principles set out in Art.5 of the GDPR and Article 11 of the Code;
- specific security measures are observed to prevent data loss, illicit or incorrect use and unauthorized access, pursuant to Article 32 of the GDPR and Article 31 of the Code.

### Contact details for Data Controller and Data Protection Officer (hereinafter DPO)

- the Data Controllers are the companies in the Group (hereinafter referred to as “Borgonovo Group”, “Group”, “we (also implied)”, “us” and “our”) in the person of the company legal representatives pro-tempore;
- the Group has appointed a DPO, who can be contacted for all information on the subject of privacy and to exercise all the rights envisaged in the provisions of Articles 15-21 of the GDPR (specified below).

### Contact Details

CONTROLLER Address: Via Pianello, 75 – 29011 Borgonovo Val Tidone (PC) – Tel: +39 0523.865311 – [info@valentina96.com](mailto:info@valentina96.com)

DPO: Address: Via Caorsana, 32 – 29122 Piacenza – Tel: +39 0523.010250 – Email: [info@gallidataservice.com](mailto:info@gallidataservice.com)

### Rights of data subjects

- right to request the existence and access to the personal data concerning said data subject (Art.15 “Right to access”)
- right to have incorrect or incomplete data amended/supplemented (Art.16 “Right to amendment”)
- right to obtain the cancellation of the data, if justified reasons exist (Art.17 “Right to cancellation”)
- right to obtain limitation of processing (Art.18 “Right to limitation”)
- right to receive data concerning the data subject in a structured format (Art.20 “Right to portability”)
- right to object to processing and to automated decision-making processes, including profiling (Art.21, 22)
- right to revoke consent provided previously;
- right to lodge, in the absence of an answer, a claim with the data protection Supervisory Authority.

### Specific information referring to the various processing scopes (see following chapters)

- 1) processing of data connected to relationships established with customers and suppliers;
- 2) processing of data connected to the functioning of this website.

## 1) DATA PROCESSING CONNECTED TO THE RELATIONSHIPS WITH CUSTOMERS AND SUPPLIERS

### 1.1 Object of the processing

The Company processes personal identifying data of customers / suppliers (for example, name, surname, company name, personal / fiscal data, address, telephone, e-mail, bank and payment details) and its operative contacts (name surname and data contact information) acquired and used for managing the services provided by the Company.

### 1.2 Purposes and legal basis of the processing

Data are processed to:

- manage contractual / professional agreements, as well as manage the necessary communications connected to them;
- fulfill the obligations established by law, by a regulation, by the community legislation or by an order of the Authority;
- exercise a legitimate interest of the Controller (for example: the right of defense in court, the protection of credit positions; the ordinary internal operating, management and accounting needs).

Failure to provide the aforementioned data will make it impossible to establish the relationship with the Controller. The aforementioned purposes represent, pursuant to Article 6, commi b, c, f, suitable legal bases for the lawfulness of

the processing. If it is intended to carry out treatments for different purposes, it will be required a specific consent from the data subjects.

### 1.3 Methods of the processing

The processing of personal data is carried out by means of the operations indicated in Art. 4 n. 2) GDPR and exactly as: collection, registration, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, deletion and destruction of data. Personal data are subjected to both paper and electronic and / or automated processing. The Data Controller will process personal data for the time necessary to fulfill the purposes for which it was collected and related legal obligations.

### 1.4 Scope of the processing

The data are processed by internal regularly authorized subjects and instructed pursuant to Article 29 of the GDPR. It is also possible to request the scope of communication of personal data, obtaining precise indications on any external subjects operating as managers or independent data controllers (consultants, technicians, banks, transporters, etc.). We also inform you that personal data may be the subject of intercompany communication between Group companies.

## 2) DATA PROCESSING RELATED TO THIS WEBSITE

### 2.1 Navigation Data

The information systems and software procedures relied upon to operate this web site acquire personal data as part of their standard functioning; the transmission of such data is an inherent feature of Internet communication protocols. Such information is not collected in order to relate it to identified data subjects, however it might allow user identification after being processed and matched with data held by third parties. This data category includes IP addresses and/or the domain names of the computers used by any user connecting with this web site, the URI (Uniform Resource Identifier) addresses of the requested resources, the time of such requests, the method used for submitting a given request to the server, returned file size, a numerical code relating to server response status (successfully performed, error, etc.), and other parameters related to the user's operating system and computer environment.

<b>Purposes and lawfulness of processing</b> (GDPR-Art.13, c.1, lett.c)	These data are only used to extract anonymous statistical information on website use as well as to check its functioning. The data might be used to establish liability in case computer crimes are committed against the website (Controller legitimate interest).
<b>Scope of communication</b> (GDPR-Art.13, c.1, lett.e,f)	The data may only be processed by internal personnel, duly authorized and instructed in the processing (GDPR-Art.29) or by the Processor of the web platform (appointed Data Processor, Art.28 GDPR) and will not be disclosed to other parties, disseminated or transferred to non-EU countries. Only in the case of an investigation they can be made available to the competent authorities.
<b>Data retention</b> (GDPR-Art.13, c.2, lett.a)	Data are usually kept for short periods of time, with the exception of any extensions connected to investigations.
<b>Data provision</b> (GDPR-Art.13, c.2, lett.f)	The data are not provided by the data subject but automatically acquired by the site's technological systems.

### 2.2 Cookies

For specific information you can consult the cookies policy:

Cookies are brief fragments of texts (letters and/or numbers) that allow the web server to memorise on the client browser information to be reused in the course of the same visit to the site (session cookies) or subsequently, also after days (persistent cookies). The cookies are memories, according to the user's preferences, by the single browser on the specific device used (computer, tablet, smartphone). Similar technologies like for example, web beacons, transparent GIFs and all the types of local storage introduced with HTML5, can be used to gather information on the user's behavior and the use of the services. After this circular letter we shall refer to the cookies and all the similar technologies by using only the term "cookie."

## EXAMPLE OF COOKIES THAT COULD BE USED IN THE SITE

**Technical cookies:** this type of cookies is needed for the correct functioning of some areas of the sites. The cookies of this category include both persistent and session cookies. In their absence, the site or some portions of it may not function properly.

**Analytical cookies:** this type of cookies is used to gather information on the use of the site. Such information may be used for statistical analyses, to improve the site and simplify its use, besides monitoring the correct functioning. This type of cookie gathers information in anonymous form on the activities of the site user and the way in which they landed in the site and the pages visited. This category of cookies are sent by the site itself or by third-party domains (Google Analytics: the user may disable in a selective manner, the action of Google Analytics by installing on their own browser the opt-out component furnished by Google at the following link <https://tools.google.com/dlpage/gaoptout>. For further information consult the links indicated below: <https://www.google.it/policies/privacy/partners/>)

**Social Network:** The site may contain links and plug-ins to corporate pages found on the social networks, that may entail the use of cookies of the social network itself. At the following links you may view the cookies policies and manage one's own preferences:

- Facebook (informative): <https://www.facebook.com/help/cookies/>
- Facebook (configuration): own account –privacy section
- Youtube: <https://www.youtube.com/?hl=it&gl=IT>
- LinkedIn (informative): <https://www.linkedin.com/legal/cookie-policy>
- LinkedIn (configuration): <https://www.linkedin.com/settings>
- Google+ (informative): <http://www.google.it/intl/it/policies/technologies/cookies/>
- Google+ (configuration): <http://www.google.it/intl/it/policies/technologies/managing/>
- Twitter (informative): <https://support.twitter.com/articles/20170514>
- Twitter (configuration): <https://twitter.com/settings/security>

**Management of the preferences through the main navigation browsers** The user may declare whether or not he accepts the cookies by using the settings of his own browser (note that as a default, almost all the web browsers are set to automatically accept the cookies). The settings may be modified and defined in a specific way for the various web sites and applications. Furthermore the best browser allows different settings to be defined for the “proprietor” cookies and for those of “third parties.” Usually the configuration of the cookies is done by the menus, “Preferences,” “Instruments” or “Options.” Here below is a list of links to the guides for the management of cookies of the main browsers:

**Internet Explorer:** <http://support.microsoft.com/kb/278835>

**Internet Explorer [mobile version]:** <http://www.windowsphone.com/en-us/how-to/wp7/web/changing-privacy-and-other-browser-settings>

**Chrome:** <http://support.google.com/chrome/bin/answer.py?hl=en-GB&answer=95647>

**Safari:** <http://docs.info.apple.com/article.html?path=Safari/5.0/en/9277.html>

**Safari [versione mobile]:** <http://support.apple.com/kb/HT1677>

**Firefox:** <http://support.mozilla.org/en-US/kb/Enabling%20and%20disabling%20cookies>

**Android:** <http://support.google.com/mobile/bin/answer.py?hl=en&answer=169022>

**Opera:** <http://help.opera.com/opera/Windows/1781/it/controlPages.html#manageCookies>

### Further information

- [www.allaboutcookies.org](http://www.allaboutcookies.org) (for more information on the cookie technology and their functions)
- [www.youronlinechoices.com/it/a-proposito](http://www.youronlinechoices.com/it/a-proposito) (allows users to oppose the installation of the main profiling cookies)
- [www.garantepriacy.it/cookie](http://www.garantepriacy.it/cookie) (set of main norm interventions on matters by the Italian Supervisory Authorities)

### 2.3 Specific services

The website may contain data collection forms designed to guarantee the user any services / features (eg: request information, registrations, etc.).

<b>Purpose and legal basis of the processing</b> (GDPR-Art.13, comma 1, lett.c)	The identification and contact data necessary to respond to the requests of the data subjects could be requested. The submission of the request is subject to specific, free and informed consent (GDPR-Art.6, comma1, lett.a).
<b>Scope of communication</b> (GDPR-Art.13, paragraph 1, lett.e, f)	The data are processed exclusively by authorized and trained personnel (GDPR-Art.29) or by any persons responsible for maintaining the web platform or providing of the service (appointed in this case external managers). The data will not be disclosed or transferred to non-EU countries.
<b>Data retention period</b> (GDPR-Art.13, paragraph 2, letter a)	Data are kept for times compatible with the purpose of the collection.
<b>Data provision</b> (GDPR-Art.13, comma 2, lett.f)	The provision of data related to the mandatory fields is necessary to obtain an answer, while the optional fields are aimed at providing the staff with other useful elements to facilitate contact.

#### **Data provided voluntarily by users**

Sending e-mail messages to the addresses mentioned on this website, which is done on the basis of a freely chosen, explicit, and voluntary option, entails acquisition of the sender's address, which is necessary in order to reply to any request, as well as of such additional personal data as is contained in the message(s). The sender who gives his curriculum to submit his job application remains the only responsible for the relevance and accuracy of the data sent. It should be noted that any curriculum without the data processing consent will be immediately deleted.

#### **POLICY UPDATING**

It should be noted that this information may be subject to periodic review, also in relation to the relevant legislation and jurisprudence. In the event of significant changes, appropriate evidence will be given in the home-page of the site for a suitable time. In any case, the interested party is invited to periodically consult the present policy.