

INFORMATION ON THE PROCESSING OF PERSONAL DATA

Pursuant to and for the Legislative Decree no. 196/2003, as amended by the Legislative Decree no.101/2018, as well as pursuant to articles 13 and 14 of European Regulation 679/2016, laying down provisions on the protection of individuals in relation to the processing of personal data, we inform you that this information applies to the personal data directly provided to the firm Arione S.p.A. or the personal data gathered by cookies and other web tracking technologies.

1. DATA PROCESSOR

The data processor is Arione S.p.A. (VAT no. 00203190053), as legal representative pro tempore, with legal headquarters in Canelli (AT), via Luigi Bosca no.135, tel. no.: 0141/823172 – fax no.: 0141/835172 – e-mail address: canelli@arione.it and administrative headquarters in Castiglione Tinella (CN), via San Carlo 8, tel. no.: 0141/855116 – fax no.: 0141/855231 – e-mail address: castiglione@arione.it.

2. DATA PROCESSING PLACE

The processing of personal data takes place at the facilities of the firm Arione S.p.A. and is performed only by technical personnel in charge of the processing.

If necessary, the personal information related to the web services of this site can be handled by the personnel in charge of the maintenance of the technological part of the site, appointed as data controllers.

3. NATURE OF THE PROCESSED DATA AND PURPOSE OF THE PROCESSING

The information provided through the sending of electronic mails and/or through the filling out of a registration form will only be used to answer to your questions or fulfill your requests.

We will also handle the information concerning the IP addresses or the domain names of the users that log into our website, the addresses in URI notation for the resources requested, the time of the request, the method of use to deliver the request to the server, the size of the file obtained in response, the numeric code indicating the status of the answer given by the server (successful answer, error etc.) and other parameters regarding the operating system and the user's IT environment.

This information is used for the sole purpose of gathering anonymous statistics on the use of the site to check its correct functioning and will be deleted after the processing of your request.

The aforementioned data could be used to establish liability in the case of hypothetical computer crimes which damage the site.

Only after expressing your consent, Arione S.p.A. will be allowed to process your personal data for different purposes, such as the sending of promotional and commercial information.. Your personal data can be made available to our business partners in order to disclose useful information or send relevant promotional materials.

4. LEGAL BASIS OF THE PROCESSING

It is your own choice what personal information you decide to provide to our firm. We do not possess any illicit means of obtaining such information without your consent.

5. METHODS OF PROCESSING



The processing of personal data can take place with or without the help of electronic or automated devices.

Information systems and software used by this website can acquire, as part of our standard operating procedures, some personal data which is transmitted automatically when using Internet communication protocols.

This information is not collected for the purpose of being associated to specific identified parties. However, due to their very nature, it would be possible to identify users by processing the information and associating it with information held by third parties.

In any case, the processing of information will be carried out in observance of all cautionary measures that ensure its legitimacy, security and confidentiality.

6. CATEGORIES OF SUBJECTS TO WHOM PERSONAL DATA MAY BE COMMUNICATED

Personal data can be made available to our data controllers (collaborators, suppliers, secretaries etc.) or to the people appointed to carry out the data processing (data processors).

Your data may be disclosed to public or private bodies, who can access them in accordance with provisions of law, regulations or Community rules, within the limits of this legislation (such as, for instance, associations of local authorities, public and government bodies, associations, foundations, bodies of an associative and insurance nature), to people who need to access these data in order to facilitate the relationship between the parties, within the limits necessary to perform auxiliary tasks (for instance, banks and credit institutions, service providers, carriers and shipping companies), to our consultants, within the limits necessary to assume their duties in our firm, after being appointed as people in charge of the processing of the data provided. Your data will not be disclosed, by which we mean shared with any unspecified third parties, in whatever way, unless you express and grant a free and informed consent for every type of processing.

7. RIGHT OF PROVISION OF DATA

Without prejudice to the personal autonomy of the person concerned, if mails are sent voluntarily, explicitly and optionally to addresses given on this site, the sender's address, which is required to respond to requests, is automatically acquired, as are any other personal data which may be included in the communication.

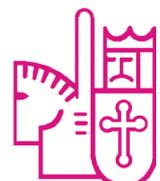
8. RETENTION PERIOD OF PERSONAL DATA

The personal data will be used only for the time needed to fulfill the purposes described above, that is until you refuse your consent to the use of your personal data by Arione S.p.A..

In case Arione S.p.A. is required to store, by law, your personal data for a longer time or in case Arione S.p.A. needs your data for the establishment of claims or the defence against claims, the firm will store your personal data until the end of the period of compulsory detention or until the termination of the claims.

In any case, your personal data will be stored for no longer than 10 years.

9. COOKIES



This website makes use of cookies. Cookies are small text files that allow you to store information on visitor preferences, to improve the functionality of the site, to simplify navigation by automating the procedures (for instance: login, language of the website) and to analyse the website use.

Two macro-categories are defined: “technical” cookies and “profiling” cookies.

This website uses the so-called “technical” cookies in order to carry out the transmission of a communication over an electronic communications network, or as strictly necessary to provide the service expressly required by the user.

These cookies can be divided into “navigation” or “session” cookies, which guarantee the normal navigation and use of the website (e.g. to allow purchases or to authenticate for access to restricted areas) and/or “analytics” cookies, assimilated to “technical” cookies, where they are used directly by the site manager to collect aggregated information about the number of users and how they visit the website. There are also “functionality” cookies which allow the user to browse the website according to a set of selected criteria (e.g. the language, the products selected for purchase) in order to improve the service delivered.

Use of the so-called “technical” cookies (session variables whose values stored on a hard drive of the device can be deleted: it is possible to disable the cookies by following the directions provided by the major browsers) is strictly limited to the transmission of session identification data (which are formed by random numbers generated by the server) and software usage data to ensure that the website can be browsed safely and efficiently: the session variables (cookies) can avoid the need to use other data processing techniques which could potentially reduce the confidentiality of the user’s navigation of the website and do not permit the acquisition of identifying personal information regarding the user.

This website does not use in any way so-called “profiling” cookies, which are aimed at creating user-related profiles and used to send commercial messages that meet the preferences shown during the navigation.

This website makes use of so-called “third parties” cookies, which are aimed at receiving on one’s own device the cookies sent by different websites or web servers during the navigation of a site (the information is stored by third parties).

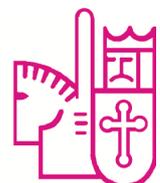
An example is represented by the “social plugins” for Facebook, Twitter, Google+ and LinkedIn (parts of the visited page directly created by these websites and integrated on the page of the hosting website), which are used to share content on social networks (the presence of such plugins involves the transmission of the cookies from and to websites. Please refer to the relevant policies to see how the management of the information collected by third parties is regulated).

The full list of privacy policies for third-party cookies used: google.com: www.google.it/intl/it/policies/privacy; youtube.com: www.google.it/intl/it/policies/privacy Addthis.com: www.addthis.com/privacy.

In order to disable cookies, we remind you that most browsers are configured to accept cookies. However, most browsers also allow you to check and disable cookies through their settings.

We remind you, however, that disabling navigation cookies or any other functionality might lead to site malfunction and/or service limitations.

10. DATA TRANSFER IN NON-EU COUNTRIES



This website might share some of the data collected with services located outside the European Union, in particular with Google, Facebook and Microsoft (Linkedin), through social plugins and the Google Analytics service. This is an automated transfer.

11. RIGHTS OF THE DATA SUBJECT

We inform you that you can request from Arione S.p.A., at any time, information about which of your personal data Arione S.p.A. processes and the correction or deletion of such personal data.

In any case, Arione S.p.A. shall only proceed to the deletion of your personal data if there is no legal obligation or overriding legal obligation on the part of Arione S.p.A. regarding their storage.

Should you request from Arione S.p.A. to delete your personal data, you may not continue using any service that requires Arione S.p.A. to use your personal data.

You can demand that Arione S.p.A. limit further handling of your personal data where there is no legal basis for it. You can also demand that Arione S.p.A. exclude your personal data from any handling or declare that the personal data held by Arione S.p.A. about you are incorrect.

Should Arione S.p.A. use your personal data under a contract concluded with you, you may request a copy of the personal data you provided the firm with.

These requests can be addressed to amministrazione@pec.arione.it by specifying the information or the processing activities to which your request refers, the format of the information you want and whether the personal data should be sent to you or to another recipient.

Arione S.p.A. will give careful consideration to your request and will discuss with you how it can best be fulfilled.

12. RIGHT TO LODGE A COMPLAINT

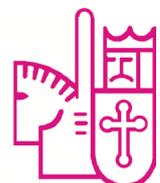
Should you feel that Arione S.p.A. is not handling your personal data according to the standards specified in this regulation, or by the rules of the European Union's General Data Protection Regulation, you may lodge a complaint with the Data Protection authority.

13. SECURITY OF PERSONAL DATA

The data are stored and controlled by adopting adequate technical and organisational security measures to guarantee a level of security appropriate to the risk and aimed at minimizing the risks of loss and/or destruction, unauthorised access and non-authorised processing and/or different from the purposes for which the processing is carried out.

The data controller, or anyone acting under his authority / under the data processor's authority, or anyone with access to the personal data, cannot process them unless he/she has been authorised by the data controller, unless this is required by the Union or Member state law. Taking into account the state of the art and the implementation costs, nature, object, context and the purposes of the processing, as well as the risks of different probability and gravity for the rights and freedoms of natural persons, the data controller and the data processor will put in place adequate technical and organizational measures to guarantee a level of security appropriate to the risk, which include, among others:

- a) the pseudonymisation and encryption of personal data;
- b) the ability to ensure on a permanent basis the confidentiality, integrity, availability and resilience of the processing systems and services;



- c) the ability to promptly restore the availability and access to personal data in the event of a physical or technical incident;
- d) a process for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing.

When assessing the adequate level of security, we must take into account the risks represented by the processing that derive from the destruction, loss, alteration and unauthorised disclosure of, or from the access, in an accidental or unlawful way, to personal data transmitted, stored or otherwise processed.

The data controller and the data processor ensure that anyone acting under their authority and having access to personal data, will not process them unless he/she has been authorised by the data controller, unless this is required by the Union or Member state law.

Canelli, 22nd June 2020

The data controller

Arione S.p.A.

