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www.igorgorgonzola.com

IGOR Srl

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Cap. Soc. € 2.000.000 i.v.
Iscritta al n. 148084 del REA di Novara



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PRIVACY INFORMATION pursuant to EU Regulation 2016/679 ("GDPR") (2 -rev-2025))

<https://www.igorgorgonzola.com>

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1. DATA CONTROLLER

The data controller is.

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IGOR s.r.l. - Strada Natale Leonardi 32 - 28062 Cameri (Novara) - Italy tel. +39 0321.2001 - info@igornovara.it , P.Iva 01099710038 (mail: privacy@igornovara.it).

The company, as the Data Controller, protects the personal data, given by you during the navigation and use of this site by ensuring their confidentiality and guaranteeing compliance with the regulations in force as well as the necessary level of protection, from any occurrence that may put them at risk of violation.

As required by Article 13 of the General Data Protection Regulation of the European Union (GDPR), the data controller informs you that the personal data, collected through this website, are processed by means of computer and/or telematic tools, for the purposes indicated below in this statement.

2. PURPOSE, LEGAL BASIS OF PROCESSING RETENTION TERMS AND TYPES OF DATA PROCESSED

A) Regarding the processing carried out by the website:

<https://www.igorgorgonzola.com/>

Scope and Purpose of Processing:

Pursuant to Article 6 EU Regulation No. 679/2016 (and subsequent legislative adaptation provisions Legislative Decree 101/2018) (GDPR) for the following Service Purposes:

(a) interaction and navigation on the site:

- 1) To enable the enjoyment and use of this website, as well as to carry out maintenance and technical support necessary for its proper functioning;
- 2) To allow the Owner to respond to requests made by you through this website.

Legal basis for processing and nature of data provision:

The legal basis underlying the processing referred to in (a) of this point is provided for in Art. 6 par.1(f) GDPR, which states that "processing is necessary for the purposes of pursuing the legitimate interests of the data controller or a third party".

The Processing of Personal Data will be legally based on the contractual relationship that will be created between the data subject and the Data Controller as a result of your interaction with the company's specific website;

Types of data processed:

With regard to the data processed by this website, the owner processes:



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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.

Accordingly, the following personal data, by way of example, may be processed:

Navigation data:

This category of data includes IP addresses or domain names of the computers and terminals used by users, addresses in URI/URL (Uniform Resource Identifier/Locator) notation, the time of the request, the method used in submitting the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the user's operating system and computer environment. These data, necessary for the use of web services, are also processed for the purpose of:

- obtain statistical information on the use of services (most visited pages, number of visitors by time slot or daily, geographical areas of origin, etc.);
- check the proper functioning of the services offered.
- data communicated by the user: such as, for example, personal data provided by you through the "contact" form or data given in the "Create an account and join Club Nove25" section.

In particular, it is specified that the data processed by means of the website are:

Derived data

Information that our servers automatically collect when you access the Site, such as your IP address, browser type, operating system, access times, and pages viewed directly before and after accessing the Site.

Third-party data

Information from third parties, such as personal information or network friends, may be collected if you link your 'account to the third party and grant the Site permission to access this information. Data from contests, giveaways and surveys Personal and other information that may be provided when you enter contests or giveaways and/or respond to surveys.

Data retention periods

Time depending on the retention terms of each cookie

B) Regarding the activity of the data controller.

Toward customers:

a)

Purpose: contract

The Data Controller, in order to allow the purchase of its products and/or services, as well as to follow up on your requests needs to collect some Personal Data, as requested within the subscription or purchase form

Legal basis and nature of contribution

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Execution of pre-contractual and contractual measures taken at the request of the data subject and/or execution of a contract to which the data subject is a party (Art. 6(1)(b) GDPR). In case of refusal to provide personal data, it will not be possible for the Controller to provide the service

Type of data

Identifying and contact data: first name, last name, e-mail address, telephone number, Tax code, City, Country of residence, other data that may be provided by the customer.

Data retention periods:

Throughout the duration of the contractual relationship and for 10 years from the conclusion of the relationship

b)

Purpose: Legal Obligations

Record invoices, receive payments;

- Fulfilling pre-contractual, contractual and tax obligations arising from the customer relationship;
- Fulfill obligations under the law, a regulation, EU legislation or an order of the Authority

Legal basis and nature of conferral:

Legal obligation to which the owner is bound (Art. 6(1)(c) GDPR).

The provision of data is mandatory, and in case of refusal to provide personal data, it will not be possible for the Holder to provide the service

Data type:

Identification and contact information:

First name, last name, e-mail address, phone number, Social Security number, City, Country of residence

Data retention periods:

Throughout the duration of the contractual relationship and for 10 years from the conclusion of the relationship

c)

Purpose: Defense in court

Exercise the Holder's rights, such as any right of defense in court.

Legal basis and nature of conferral:

Legitimate interest of the data controller (Art. 6(1)(f) GDPR): right of defense fairly balanced with the same right of the data subjects identification and contact data:

Data type:

First name, last name, e-mail address, phone number, social security number, city, country of residence, and other data necessary for litigation

Data retention periods:

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For the duration of the contractual relationship and for 10 years from the conclusion of the relationship.

d)

Purposes: marketing, newsletter sending activities, commercial communications

The performance by the Data Controller of its own promotional and/or marketing activities against. This category includes all activities performed to promote products, services, sold and/or provided by the Data Controller; subject to specific consent.

Legal basis and lawfulness of processing:

Legitimate Interest under Article 6(f) of the Regulations - The Processing of Personal Data will be conducted by the Data Controller and will be legally based on its legitimate interest in promoting its products and services;

Legal basis and lawfulness of processing:

Consent of the Data Subject ex art. 6 letter a) of the Regulations - The Processing of Personal Data will be conducted by the Data Controller and will be legally based on **free, express and unequivocal consent.**

Data types:

Identifying and contact information: first name, last name, e-mail address, phone number, social security number, city, country of residence,

Data retention periods:

24 months after collection

e)

ACTIVITIES

Participation in events organized by the owner

PURPOSE OF PROCESSING

the Data Controller, in order to allow you to participate in one of the events it organizes, needs to collect some of your Personal Data, as requested within the event registration form/form.

LEGAL BASIS AND LAWFULNESS OF PROCESSING AND NATURE OF CONFERMENT

contractual purpose/legal obligations ex art. 6 letters b) and c) of the Regulations - the Processing of your Personal Data will be conducted by the Data Controller to register you for the event and ensure your participation and therefore will be legally based on the contractual relationship that will be created between you and the latter;

The provision of data is optional in nature but in case of refusal to provide personal data it will not be possible for the Holder to provide the service

TYPE OF DATA PROCESSED

Identification and contact information:

First name, last name, e-mail address, phone number, Social Security Number, City, Country of residence,

STORAGE TERMS

Data are kept for the time required to organize the event and for 24 put from the collection of the data

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With regard to suppliers:

g)

Purposecontract:

- carry out the proper execution of contracts and supply services and, in particular;;
- for contractual/pre-contractual relationship management with the company, financial and business relationship management;
- for the management of personal data of the legal representative of the supplier
- legal person and the execution of pre-contractual activities
- to conduct the preliminary assessment of services proposed by potential providers;
- for entry into master records in company computer databases;

Legal basis and nature of contribution

Execution of pre-contractual measures taken at the request of the data subject and/or execution of a contract to which the data subject is a party (Art. 6(1)(b) GDPR).

In case of refusal to provide personal data, it will not be possible for the Holder to provide the service.

Type of data

Identification and contact information:

First name, last name, e-mail address, phone number, Social Security number, City

Data retention period

Throughout the duration of the contractual relationship and for 10 years from the conclusion of the relationship

h)

Legal obligations

- Recording invoices, receiving payments;
- Fulfilling pre-contractual, contractual and tax obligations arising from the customer relationship;
- Fulfill obligations under the law, a regulation, EU legislation or an order of the Authority

Legal basis and nature of contribution

-Legal obligation to which the owner is bound (Art. 6(1)(c) GDPR).

In case of refusal to provide personal data, it will not be possible for the Holder to provide the service.

Type of data

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Identifying and contact information: first name, last name, place and date of birth, e-mail address, phone number

Data retention period

Throughout the duration of the contractual relationship and for 10 years from the conclusion of the relationship

i)

Purpose: Defense in court

Exercise the Holder's rights, such as any right of defense in court.

Legal basis and nature of conferral:

Legitimate interest of the data controller (Art. 6(1)(f) GDPR): right of defense fairly balanced with the same right of the data subjects identification and contact data:

Data type:

First name, last name, e-mail address, phone number, tax code, city, country of residence, and other data necessary for litigation

Data retention periods:

For the duration of the contractual relationship and for 10 years from the conclusion of the relationship.

With respect to employees/collaborators

j)

The processing of personal data, including special data within the meaning and effect of Article 9 of the GDPR, including those of third parties, provided when entering into the contract of employment is carried out in accordance with the contract itself and/or the collective bargaining agreement for the sector, as well as in compliance with legal obligations.

The refusal to provide all or some of the requested data and/or the provision of partial and/or untrue data by the data subjects prevents the Data Controller from fulfilling its legal and contractual obligations, in particular the obligations of a welfare, social security nature, including in relation to the application for family allowances. In particular, the purposes are:

to fulfill obligations under the employment contract (e.g., to verify the exact performance, to commensurate the amount of pay, including overtime, or bonuses to be paid, to ascertain the existence of a legitimate cause for absence, to apply for family allowances, to quantify vacation and leave);

purposes stipulated in the sector's collective bargaining agreement (e.g. to take advantage of union leave or expectations);

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purposes stipulated by law: for communications and proxies to social security and welfare agencies, both public and private;

to fulfill accounting obligations (e.g., legally required entries and records) imposed on the employer;

Perform security auditing activities of the Owner's IT systems to prevent unauthorized access or unauthorized communication and to protect the Owner's corporate assets;

Fulfill obligations under the law, a regulation, EU legislation or an order of the Authority;

Exercise the Holder's rights, such as the right to defense in court, if any.

Legal basis and nature of conferral:

The **legal basis** that legitimizes the processing of data for the above purposes is the performance of a contract to which the data subject is a party (Art. 6 para. 1(b) GDPR), the fulfillment of legal obligations by the Data Controller (Art. 6 para. 1(c) GDPR) and the legitimate interest of the Data Controller (Art. 6 para. 1(f) GDPR) that is fairly balanced with the rights and freedoms of the data subjects.

The processing of special data revealing the health status of the data subject is necessary to fulfill the obligations and exercise the specific rights of the data owner or the data subject in the field of labor and safety law (Art. 9, no. 2 lett. b of the GDPR), as well as for occupational medicine purposes (Art. 9, no. 2 lett. h of the GDPR).

The provision of personal data is mandatory, as it is required for the fulfillment of legal and contractual obligations.

Failure to provide personal data will make it impossible for the Owner to establish and/or continue a working relationship or collaboration with the person concerned.

Data retention periods:

10 years after termination of employment

As for the purposes inherent in the preservation of **corporate staff e-mail metadata** they are:

- a) Compliance with the Consumer Code in respect of customers, that is, allowing the fulfillment of customer requests in accordance with the regulations set forth in Legislative Decree No. 206 of September 6, 2005, as amended L.30/12/2023 No. 214;

Security of IT systems and assets;

Fulfillment of legal obligations and industry regulations;

defense at trial;

Verification of proper use of company resources and prevention of abuse or breach of contract;

Ensure the proper functioning of electronic mail.

The legal basis for data processing in this case is:

- the legitimate interest of the data controller: in accordance with European and national regulations, in order to ensure information security, and to carry out the assessment of the smooth operation of the company's business policy violations.



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In respect of the candidates

k)

Purpose: Personnel selection

Purposes related to the execution of pre-contractual negotiations:

Managing the process of selecting and evaluating candidates for inclusion in the corporate organization, including evaluating individuals to fill positions sought;

The Data Controller may process special data ex art. 9 GDPR such as but not limited to: health status, membership in protected categories, disability, or union membership, etc. The legal basis legitimizing the processing of data for the purposes specified above is the execution of pre-contractual negotiations requested by the data subject is party (art. 6 no. 1 letter b) of the GDPR). In connection with the evaluation of the application, the Data Controller may also process special personal data under Article 9 GDPR, such as, but not limited to, those revealing health status or religious beliefs or trade union membership.

Legal basis and nature of contribution

The legal basis legitimizing the processing in this case is the specific and informed free consent of the data subjects (Art. 6 No. 1 letter a) of the GDPR). In case consent is not given, it will not be possible to evaluate the application.

Data subjects have the right to revoke their consent at any time, but processing carried out before revocation remains lawful. After revocation, the data controller will cease processing the data for which consent is required (Art. 7 No. 3 GDPR).

Type of data

Curriculum vitae and the data contained therein: Contact data (such as, e.g., address, e-mail address, telephone number, etc.); Data on education, professional experience, and previous activities; special categories of personal data (such as, e.g., health status, union membership, etc.) only to the extent that such information is contained on the cv, Photo as it is on the cv

Data retention period

12 months after collection, unless employment relationship is established with the data subject

l)

Legal obligation

Fulfilling obligations under the law, with reference to possible subsequent employment.

Legal basis and nature of contribution

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The legal basis legitimizing the processing of data for the purposes specified above is the fulfillment of legal obligations (Art. 6 No. 1 letter c) of the GDPR).

Type of data

Contact data (such as, for example, address, e-mail address, telephone number, etc.); data on education, professional experience, and previous activities;

Data retention period

12 months after collection, unless employment relationship is established with the data subject

m)

Litigation defense

Protecting the rights of the owner and exercising the right of defense in case of litigation

Legal basis and nature of contribution

The legal basis legitimizing the processing of data for the purposes specified above is the legitimate interest of the Data Controller (Art. 6 No. 1 letter f) of the GDPR), which in this case is fairly balanced with the rights and freedoms of the data subjects. Contact data (such as, for example, address, e-mail address, telephone number, etc.);

Type of data

Data on education, professional experience and previous activities; and data necessary for defense in court.

Data retention period

12 months after collection, unless employment relationship is established with the data subject.

3. PROCESSING METHODS AND HOW DATA ARE COLLECTED

The processing of personal data is carried out by means of the following operations: collection, recording, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, deletion and destruction of data.

The processing will be carried out either by manual and/or computerized and telematic means with logics of organization and processing strictly related to the purposes themselves and in any case in such a way as to guarantee the security, integrity and confidentiality of the data themselves in compliance with the organizational, physical and logical measures provided for in Articles 24 and 25 and 32 of the GDPR.

The personal data subject to processing are collected directly by the Data Controller or by third parties expressly authorized by the Data Controller, or communicated by the Data Controller to such third parties for the pursuit of the purposes set forth in this policy.

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The Data Controller carries out periodic checks so that no personal data are processed, collected, stored or retained that are not necessary in relation to the processing and related purposes as outlined in this policy.

4. ACCESS TO DATA BY PROCESSING EMPLOYEES

Personal Data may be made accessible for the exclusive purposes set forth in this policy:

- to employees and collaborators of the Controller, the auxiliaries and third persons employed companies and supply companies and in outsourcing relationship with the Controller in their capacity as authorized persons for processing and/or internal data controllers and/or system administrators;
- to third-party companies or other entities that perform outsourced activities on behalf of the Controller, in their capacity as external data controllers.

5. COMMUNICATION OF PERSONAL DATA

Personal Data may be disclosed to specific parties considered to be recipients of such Personal Data, which should be understood to mean natural or legal persons, public authority, service or other body receiving communication of Personal Data, whether or not they are third parties.

With this in mind, in order to properly carry out all Processing activities necessary to pursue the purposes set forth in this Notice, the following Recipients may be in a position to process Personal Data:

Third parties who perform part of the Processing activities and/or activities related and instrumental to the same on behalf of the Data Controller. Such individuals have been appointed as data controllers, i.e., natural or legal persons, the public authority, service or other body that processes Personal Data on behalf of the Data Controller; individuals, employees and/or collaborators of the Data Controller, who have been entrusted with specific and/or more Personal Data Processing activities. Such individuals have been given specific instructions regarding the security and proper use of Personal Data and are defined as the "*persons authorized to process Personal Data under the direct authority of the Data Controller or Data Processor.*"

Where it is required by law or to prevent or suppress the commission of a crime, Personal Data may be disclosed to public bodies or judicial authorities without, however, being defined as Recipients. In fact, the Regulation stipulates that public authorities receiving disclosure of Personal Data as part of a specific investigation conducted in accordance with Union or Member State law are not considered Recipients.

Without the need for express consent, the Data Controller may communicate your data for the above purposes to Supervisory Bodies, Judicial Authorities, insurance companies for the provision of insurance services, as well as to those subjects to whom the communication is compulsory by law for the fulfillment of the said purposes.



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Specifically, data recipients may be:

- information society and information technology assistance;
- companies, or professional firms offering professional and/or consulting services with respect to accounting, legal, tax, administrative, financial, and debt collection matters;
- IT infrastructure and solution providers;
- Web service providers;
- banks and payment service providers, acting as Processors, to whom your personal data may be disclosed for the purpose of processing your payments;
- consultants, to the extent necessary for the performance of their professional duties.

The communication concerns the categories of personal data whose transmission to the above-mentioned third parties is necessary for the performance of the activities and for the purposes referred to in this notice.

An up-to-date list of the Data Processors and the persons authorized to process the data is kept at the Data Controller's office and is available upon request to be made by e-mail to the address in point 1 of this policy.

Some of these parties may process data in their capacity as autonomous data controllers.

Your data will not be disseminated.

Data communications may also relate to:

Law or exercise of rights

If the release of information is deemed necessary to respond to legal process, to investigate or remedy potential violations of our policies, or to protect the rights, property and safety of others, we may share information as permitted or required by any applicable law, rule or regulation. This includes sharing information with other entities for fraud protection and credit risk reduction.

Third-party service providers

The site shares information with third parties who perform services for the site or on our behalf, including data analysis, emailing, hosting services, customer service, and marketing support.

Cookies and web beacons

We may use cookies, web beacons, tracking pixels and other tracking technologies on the Site to help personalize the Site and improve your experience. When you access the Site, personal information is not collected through the use of tracking technologies. Most browsers are set to accept cookies by default. You can remove or reject cookies, but you should be aware that such action may affect the availability and functionality of the Site. Users cannot reject web beacons. However, they can be made ineffective by rejecting all cookies or by changing your web browser settings to notify you each time a cookie is offered, allowing you to accept or reject cookies on an



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individual basis. We may use cookies, web beacons, tracking pixels and other tracking technologies on the Site to help personalize the Site to improve the user experience.

6. THIRD-PARTY WEBSITES

The site contains links to third-party websites and applications of interest, including external services, which are not affiliated with us.

7. PERIOD OF RETENTION OF PERSONAL DATA (SO-CALLED DATA RETENTION)

Personal data are stored mainly with both paper and digital procedures in Italy, within the European Union and precisely also outside the Holder's Head Office and in full compliance with the provisions and fulfillments necessary for the purposes of security and correct location of the data storage units. Digital storage modes are limited only to the sending of documentation and are carried out in full compliance with the provisions and fulfillments necessary for the purposes of security and proper location of the data storage units (pc and secure back up tools) as well as for the purposes of security of the paper archives.

The Data Controller will process personal data for the time necessary to fulfill the above purposes and in any case not beyond the termination of the relationship carried out for the Service Purposes. It is *considered that The Controller will process personal data for the time indicated in paragraph No. 2 of this policy.*

Personal Data collected for purposes related to the performance of a contract between the Data Controller and the User will be retained until the full performance of that contract.

The Controller may be authorized to retain Personal Data for a longer period if the User has given consent to such processing, provided that such consent is not withdrawn. In addition, the Controller may be obliged to retain Personal Data for a longer period if this is required for the fulfillment of a legal obligation or by order of an authority.

Once the retention period has expired, the Personal Data will be deleted. Therefore, the right of access, the right to erasure, the right to rectification, and the right to data portability cannot be exercised after the retention period has expired.

8. COOKIE BANNER TEXT

'We and selected third parties use cookies or similar technologies for technical purposes and, with your consent, also for the purposes of **experience, measurement, and "marketing (with personalized ads)"** as specified in the [cookie policy](#)

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Fax +39 0321 200256
e-mail: info@igomovara.it
P.IVA / C.F./Reg. Imp. di NO IT 01099710038
Cap. Soc. € 2.000.000 i.v.
Iscritta al n. 148084 del REA di Novara



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You can freely give, refuse or revoke your consent, at any time, by accessing the preferences panel. If you give your consent, it will only be valid on this domain. Refusing consent may make related features unavailable.

Use the "Accept" button to consent. Close this policy to continue without accepting. Or press refuse."

9. EXTRA EU/SEAS TRANSFER

In the management of the relationship with customers, there is no transfer of data to third countries nor to international organizations.

Should it become necessary to make transfers of personal data outside the territory of the European Union to countries not considered adequate by the European Commission, the Controller will ensure that appropriate or adequate safeguards are in place to protect personal data and that the transfer of such data complies with applicable data protection laws.

Any transfer of data subjects' data to countries located outside the European Union will, in any case, take place in accordance with the appropriate and adequate safeguards for the purposes of the transfer itself, pursuant to the applicable legislation and in particular Articles 45 and 46 of the Regulations.

Accordingly, where required by applicable data protection laws, the Owner will ensure that service providers sign Standard Contractual Clauses approved by the European Commission.

10. RIGHTS OF THE DATA SUBJECT

As users, data subjects have the following rights:

-Right to access their data, obtain confirmation of the existence or otherwise of personal data concerning them, even if not yet registered, and their communication in intelligible form; -obtain indication of: (a) the origin of the personal data; (b) the purposes and methods of processing; (c) the logic applied in the case of processing carried out with the aid of electronic instruments; (d) the identification details of the data controller, data processors and the data controller's representative and designated authorized persons; (e) the subjects or categories of subjects to whom the personal data may be communicated or who may become aware of it in their capacity as designated representative in the territory of the State, data processors or authorized persons; (Art. 15 GDPR).

-Right to update, rectify or, when interested, supplement data; (Art. 16 GDPR).

-Right to erasure, anonymization or blocking of data processed in violation of the law, including data whose retention is not necessary in relation to the purposes for which the data were collected or subsequently processed; (Art. 17 GDPR).

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-Right to request the restriction of use of data for the sole reasons of public interest and for the establishment or defense of a right, in cases where the data subject disputes the accuracy of the data and processing, in the case of exercising the right to object to processing under Article 21 GDPR, and in the other cases provided for in Article 18 GDPR; (Article 18 GDPR).

-Right to receive the personal data provided to the data controller in a structural format or on a commonly used, intelligible and accessible computer medium for any operating system (USB or duly encrypted ZIP file), and to move without constraints, the complexes of information and data concerning you from the present controller or another controller chosen by you in accordance with your purposes and in full compliance with the principles of transparency, lawfulness and proportionality of processing. This right to data portability is without prejudice to other rights; (Art. 20 GDPR).

-Right to object, in whole or in part: a) on legitimate grounds, to the processing of personal data concerning you, even if relevant to the purpose of collection; b) to the processing of personal data concerning you for any other purpose not relevant to the processing; (Art. 21 GDPR).

11. OPPOSITION TO PROCESSING AND WITHDRAWAL OF CONSENT

As provided for in the Regulations, if you have given your consent to the Processing of your Personal Data for one or more of the purposes for which you have been requested, you may, at any time, revoke it in whole and/or in part without affecting the lawfulness of the Processing based on the consent given before revocation.

The procedures for revoking consent are very simple and intuitive, simply contact the Data Controller and/or the Co-Processor companies using the contact channels provided within this Policy.

In addition to the above and for the sake of simplicity, should you find yourself in the condition of receiving advertising e-mail messages from the Co-Processor companies that are no longer of interest to you, simply click on the text "IF YOU NO LONGER WISH TO RECEIVE OUR NEWSLETTERS YOU CAN CAN CAN CANCEL BY CLICKING HERE."

placed at the bottom of the same to stop receiving any further communication or, if not present, using the additional contact channels made available by the Data Controller or the Co-Processor companies.

-Right to withdraw consent, where provided and at any time. Revocation of consent does not affect the lawfulness of the processing based on the consent given before revocation;

-Right to file a complaint with the supervisory authority.

12. WAYS OF EXERCISING RIGHTS

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You may exercise your rights at any time by sending a request by email to the address in **Section 1.** of this data protection notice, writing to the Privacy Office of the data controller, or asking for the Privacy Office or the data controller.

Users may also exercise their rights by contacting the Garante della Privacy, with Headquarters at Piazza Venezia n. 11 - 00187 Rome, Telephone switchboard: (+39) 06.696771, Fax: (+39) 06.69677.3785. For general information you can send an e-mail to: protocollo@gpdp.it, protocollo@pec.gpdp.it

13. AMENDMENTS TO THIS POLICY

The Data Controller reserves the right to make changes to this Privacy Policy at any time by giving notice to users on this site. Therefore, please consult this page often, taking as reference the date of last modification indicated at the end of the document. In case of non-acceptance of the changes made to this Privacy Policy you may request the Data Controller to delete the personal data concerning you.

14. MATERIALS

All content on the Internet Sites (not uploaded by users) is part of the data controller's own archive (including joint data controller companies), including images. Part of the photographic materials are taken from online archives. The user when registering and entering content, whether photographic or textual, for the purpose of publication on the Internet Sites, declares that he/she owns the rights (including for commercial purposes) to the uploaded images. The user therefore assumes full responsibility for the provenance and legality of the images uploaded to the Internet Sites.

15. PROCEDURE FOR REVOCATION OF CONSENTS ON DATA PROCESSING

Dear User, You may request the revocation of one or more of the privacy consents listed below by sending an email to the address **Section 1** of this Data Protection Notice and stating one or more of the options you wish to revoke.

- Revocation of Email Communications

- Revocation of third-party marketing communications by email

Once the request is received, it will generally be processed within **48 hours**.

HOW TO DISABLE COOKIES OF ANY BROWSERS USED BY THE USER FOR BROWSING BY BROWSER CONFIGURATION?

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Chrome

1. Running the Chrome Browser
2. Click on the menu on the browser toolbar next to the url entry window for browsing
3. Select Settings
4. Click Show Advanced Settings
5. In the "Privacy" section, click "Content Settings" button.
6. In the "Cookies" section, you can change the following cookie-related settings: - Allow local data to be saved locally - Change local data only until the browser is closed - Prevent sites from setting cookies - Block third-party cookies and site data - Manage exceptions for certain websites - Delete any or all cookies

For more information visit the [dedicated page](#).

Mozilla Firefox

1. Run the Mozilla Firefox Browser
2. Click on the menu on the browser toolbar next to the url entry window for browsing
3. Select Options
4. Select the Privacy panel
5. Click Show Advanced Settings
6. In the "Privacy" section, click "Content Settings" button.
7. In the "Tracking" section, you can change the following cookie-related settings: - Require sites to do no tracking - Notify sites of your willingness to be tracked - Notify no preference regarding tracking of personal data
8. From the "History" section you can: - Enable "Use custom settings" by selecting to accept third-party cookies (always, from the most visited sites or never) and to keep them for a specified period (until they expire, when Firefox closes, or to ask each time) - Remove individual stored cookies.

For more information visit the [dedicated page](#).

Internet Explorer/Edge

1. Run the Internet Explorer/Edge Browser.
2. Click on the Tools button and choose Internet Options
3. Click on the Privacy tab and in the Settings section change the slider to the of the desired action for cookies:
 - Block all cookies
 - Allow all cookies
 - Selection of sites from which to obtain cookies: move the slider to an intermediate position so as not to block or allow

all cookies, then press on Sites, in the Website Address box enter a website and then press on **Block or Allow**

For more information visit the [dedicated page](#).

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Safari 6

1. Running the Safari Browser
2. Click on Safari, select Preferences and press on Privacy
3. In the *Block Cookies* section, specify how Safari should accept cookies from Internet sites.
4. To view which sites have stored icookie click on Details

For more information visit the [dedicated page](#).

Safari iOS (mobile devices)

1. Running the Safari iOS Browser
2. Tap on Settings and then Safari
3. Tap on Block Cookies and choose from the options, "Never," "Third Party and Advertisers," or "Always"
4. To clear all cookies stored by Safari, tap on Settings, then on Safari and finally on Clear Cookies and Data

For more information visit the [dedicated page](#).

Opera

1. Running the Opera Browser
2. Click on Preferences then Advanced and finally Cookie
3. Select one of the following options: - Accept all cookies - Accept cookies only from the site you are visiting: third-party cookies and that are sent from a domain other than the one you are visiting will be rejected - Never accept cookies: all cookies will never be saved

For more information visit the [dedicated page](#).

16. DEFINITIONS AND LEGAL REFERENCES

Personal Data (or Data)

Personal data is any information that, directly or indirectly, including in connection with any other information, including a personal identification number, makes a natural person identified or identifiable.

Usage Data

This is the information collected automatically through this Application (including by third party applications integrated into this Application), including: the IP addresses or domain names of the computers used by the User who connects with this Application, the addresses in URI (Uniform Resource Identifier) notation, the time of the request, the method used in forwarding the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response from the server (successful, error, etc..) the country of origin, the characteristics of the browser and operating system used by the visitor, the various temporal connotations of the visit (e.g. the length of time spent on each page) and the details of the itinerary followed



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within the Application, with particular reference to the sequence of pages consulted, the parameters relating to the User's operating system and computer environment.

User

The individual using this Application who, except where otherwise specified, coincides with the Data Subject.

Interested

The natural person to whom the Personal Data refers.

Data Processor (or Manager)

The natural person, legal entity, public administration and any other entity that processes personal data on behalf of the Controller, as set forth in this privacy policy.

Data Controller (or Owner)

The natural or legal person, public authority, service or other body which, individually or jointly with others, determines the purposes and means of the processing of personal data and the means adopted, including the security measures relating to the operation and use of this Application. The Data Controller, unless otherwise specified, is the owner of this Application.

This Application

The hardware or software tool by which Users' Personal Data are collected and processed.

Service

The Service provided by this Application as defined in the relevant terms (if any) on this site/application.

European Union (or EU)

Unless otherwise specified, any reference to the European Union in this document is understood to extend to all current member states of the European Union and the European Economic Area.

Cookie

Cookies are Tracking Tools that consist of small portions of data stored within the User's browser.

Tracking Tool

Tracking Tool means any technology - e.g., cookies, unique identifiers, web beacons, embedded scripts, e-tags, and fingerprinting - that allows tracking Users, for example, by collecting or storing information on the User's device.

Legal references

This privacy policy is prepared based on multiple legislative orders, including Articles 13 and 14 of Regulation (EU) 2016/679.

Unless otherwise specified, this privacy policy covers this Application only.



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17. ACCEPTABLE USE POLICY FOR WEBSITE USERS

Prohibited use

You may not use the Services to post content or engage in activities that are illegal under applicable law, harmful to others, or that could expose us to liability, including but not limited to the following activities, each of which is prohibited by this AUP:

- Phishing or identity theft;
- Distribution of computer viruses, worms, Trojan horses (TROJAN) or other malicious codes (MALWARE, RANSOMWARE, etc.);
- Distribute pornography or adult content or offer escort services;
- Promoting or facilitating violence or terrorist activities;
- Infringement of intellectual property or other property rights of others.

Application

Your services may be suspended or terminated with or without notice if you violate this policy. Any violation may result in immediate suspension or termination of your account.

Reporting violations

To report a violation of this policy, contact us as per **Section 12** of this policy

We reserve the right to change this policy at any time, and you will be promptly updated of this. To make sure you are up-to-date on the latest changes, we recommend that you visit this page often.

18. DATA DELETION PROCEDURE

a. Request for Deletion of Personal Data

Users have the right to request the deletion of their personal data in accordance with Article 17 of the European Regulation 2016/679 (GDPR). To exercise this right, users can send a written request to the email address in Section 1 of this policy or **use the form available on our website**.

The request must contain the following information:

- First and last name
- Email address used for registration
- A clear description of the cancellation request

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We undertake to respond to all cancellation requests without undue delay and, in any case, within one month of receipt of the request. If we need additional information to verify your identity, we reserve the right to extend the response period by up to two months, informing you of the reason for the delay. Please note that there may be some circumstances in which we cannot proceed with data deletion, such as if the data is needed to fulfill legal obligations or for archival purposes. In such cases, we will inform you of the reasons why we cannot proceed with the request.

APPENDIX:

cookie policy

https://www.iubenda.com/privacy-policy/25733272/cookie-policy?an=no&s_ck=false&newmarkup=yes

19. Consent forms: (to be entered in the contact form on the "Contact" page of the website)

The undersigned as the data subject declares that he/she has received the information set forth in this notice and that he/she is also fully informed regarding the manner and purpose of the processing of his/her personal data as well as in relation to the rights recognized and the principles set forth in the (GDPR) and, having to you in relation to the intercurrent relationships, process the data of the undersigned

expresses

☐

denies

☐

your consent to the processing of data for the purposes of promotion and commercial information, including the sending of newsletters and information material on products offered by the data controller.

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