

**Policy pursuant to Art. 13 of EU Regulation 2016/679
for the users consulting the website www.cipriani-phe.com**

This page describes how the site manages the processing of personal data of the users who consult it. This policy (or “privacy policy”) is provided pursuant to Art. 13 of EU Regulation 2016/679, European Regulation on Personal Data Protection (hereinafter, “Regulation” or “GDPR”) for those who interact with the web services of the website <http://www.cipriani-phe.com>
The policy is provided only for the <http://www.cipriani-phe.com> website and not for other websites accessed by the user through the link.

1. THE DATA CONTROLLER

The Data controller, pursuant to Art. 4 and 24 of EU Reg. 2016/679 is **CIPRIANI PHE SRL**, with offices in via Nassar 46, 37026 Pescantina (VR), tel. 039 045 6750065, Mail: info@cipriani-phe.com

2. PERSONAL DATA SUBJECT TO PROCESSING

“**personal data**”: means any information relating to an identified or identifiable natural person (“data subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

a) Browsing data

During their normal operation, computer systems and software procedures used for correct Website functioning acquire certain personal data, the transmission of which is implicit in website browsing. This information is not collected to be associated with identified parties; however, by its very nature it could, through processing and association with data held by third parties, allow users to be identified. This data category includes IP addresses or domain names of computers and terminals used by users, the URI/URL (Uniform Resource Identifier/Locator) of requested resources, the request time, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the reply given by the server (successful, error, etc.) and other parameters regarding the operating system and computer environment of the user.

b) Data supplied voluntarily by the data subject

The optional, explicit and voluntary transmission of electronic mail to the addresses indicated on this website entails the acquisition of the sender's email address, necessary to respond to the request, as well as any other personal data included in the message (request for contact or information).

Besides that specified for browsing data, the user is free to provide personal data to request the transmission of information material or other communications. Failure to provide it may make it impossible to process the request.

Specific summary information will be published on the site pages dedicated to the provision of certain services.

c) Cookies

For further information on the cookies used by this website, see the cookies policy available on the website.

3. PURPOSE AND LEGAL BASIS OF THE PROCESSING. DATA RETENTION PERIOD

The collected data will be processed for the following purposes:

Website browsing: allow you to browse our website and other digital platforms.

The legal basis of the processing is art. 6 par. 1 letter f): Legitimate interest.

Data retention period: up to the duration of the browsing session. For browsing, see the cookie policy.

Data collection through contact forms: allows you to obtain information on our services, by filling-in the dedicated form on our website, in our "Contacts" section, for example to forward requests and receive feedback from the Data controller.

The legal basis of the processing is art. 6 par. 1 letter b): execution of pre-contractual measures, also adopted at the request of the data subject.

Data retention period: 1 year for contacts

Newsletter subscription: request for subscription to newsletters, information and/or commercial communications, in relation to **CIPRIANI PHE SRL** products or services

The legal basis of the processing is art. 6 par. 1 letter a): consent

Data retention period: Duration of service | opt out included in all communications

Besides what is specified for browsing data, the user is free to provide the personal data. The provision of data is optional, however failure to provide the data marked with the symbol* or wording (requested), will make it impossible to obtain the information requested through the form and, therefore, receive communication via the mailing list service.

4. PROCESSING METHOD

Data processing will be executed automatically or manually, using methods strictly related to the purposes indicated and, in any case, to guarantee security and confidentiality of the data, by persons authorised to do so. This data will be stored, as specified above, for the time strictly necessary to provide you with the requested services and will, in any case, be eliminated following your request, without prejudice to further conservation obligations required by law.

5. POSSIBLE RECIPIENTS AND CATEGORIES OF RECIPIENTS OF PERSONAL DATA

Personal data may be communicated to third parties that carry out the necessary activities for the provision of services offered by the Site that will process the data as data processors (art. 28 of EU Reg. 2016/679) and/or as natural persons acting under the authority of the Data Controller and Processor (art. 29 of EU Reg. 2016/679), acting under the authority of the Data Controller and Processor. Specifically, the data will be processed by:

- subjects that provide services for managing the information system and telecommunications network; including e-mail, newsletters and website management; freelancers, offices or companies in the field of assistance and consultancy;
- competent authorities for the fulfilment of legal obligations and/or provisions of public bodies, upon request.

The list of Data processors is available at the company's head office.

6. TRANSFER OF PERSONAL DATA TO A THIRD COUNTRY AND/OR INTERNATIONAL ORGANISATION

The personal data provided will be transferred to European Union Member States and Non-EU Countries in order to fulfil contractual obligations and for purposes connected and subject to the limits and conditions established by art. 44 et seq. of Reg. (EU) 2016/679. The data will be transferred based on Article 44 – General principle for transfers; Article 45 – Transfers on the basis of an adequacy decision, more specifically the data will be transferred to international organisations or third countries for which the Commission has issued an adequacy assessment. The data subject may obtain information on the data transfer guarantees by writing an e-mail to : info@cipriani-phe.com

To send e-mails for its newsletter services, the company uses the Mailchimp platform owned by "The Rocket Science Group LLC" (Atlanta, USA), which adheres to the Privacy Shield agreement regulating the transfer of personal data between the European Union and the USA. More information available on <https://mailchimp.com/legal/privacy/>

7. RIGHTS OF THE DATA SUBJECT

Pursuant to art. 15 et seq. of the GDPR, data subjects have the right to ask the Data Controller for:

- access to their personal data;
- the rectification or cancellation of said data or the limitation of the processing concerning it;
- opposition to processing;
- data portability in the terms set forth in art. 20 of the above regulation;
- if the processing is based on article 6, paragraph 1, letter a) or article 9, paragraph 2, letter a), of the above regulation, revocation of consent at any time without prejudice to the lawfulness of the processing based on the consent given prior to the revocation.

Without prejudice to any other administrator or jurisdictional appeal, the data subject who considers that the processing in question violates the GDPR, has the right to complain to the Guarantor of personal data protection in the manner described on the site www.garanteprivacy.it (art. 77 of the above regulation).

To exercise the above rights, the data subject may contact the Data controller at the addresses indicated in point 1 of this policy.

8. UPDATES

This privacy policy may be modified and/or supplemented as a result of any subsequent regulatory changes and/or additions, the updating or provision of new services or technological innovations.

14/03/2019