

## **PRIVACY POLICY**

This information is provided for visitors and users of the site owned by ITACA s.r.l., with its registered office in Via Sandro Pertini 12 - 63812 Montegranaro (FM), [www.itacasw.it](http://www.itacasw.it) and not for other websites possibly consulted by the user through internal links.

Dear visitor, pursuant to EU Regulation 2016/679 ("Regulation" or "GDPR"), we wish inform you that ITACA s.r.l., by using this site, may become aware of personal data related to you. To this end, it is necessary for us to provide you with the following information in fulfillment of the obligation imposed by the aforementioned legislation.

### **WHO IS THE HOLDER OF THE TREATMENT?**

The data controller is ITACA s.r.l. based in Via Sandro Pertini 12 - 63812 Montegranaro (FM).

### **WHAT IS THE LEGAL BASIS FOR THE PROCESSING OF YOUR DATA?**

Your data will be processed on the basis of your consent.

### **WHERE DO WE PROCESS YOUR DATA?**

The treatments connected to the web services of this site take place at the aforementioned headquarters of the ITACA s.r.l. and are only handled by technical personnel responsible or in charge of processing, or by any managers or persons in charge of occasional maintenance operations.

### **ARE YOUR DATA TRANSFERRED ABROAD?**

ITACA s.r.l. today it processes your data without transferring them to foreign countries. The privacy policy allow the transfer of personal data abroad with the user's consent or wherever there is another legal justification and an adequate level of data protection is ensured. ITACA s.r.l. undertakes to ensure that if the data are transferred abroad, this in full compliance with the principles and requirements of local and European Union law, and that they are adopted suitable security measures for the protection of personal data in these countries / territories.

### **HOW ARE YOUR DATA PROCESSED AND FOR HOW LONG?**

Personal data are processed with automated tools for the time strictly necessary a the purposes for which they were collected. Specific security measures are observed for prevent data loss, illicit or incorrect use and unauthorized access.

### **WHAT ARE YOUR RIGHTS?**

In your capacity as an interested party, you can exercise, using the methods indicated in the paragraph "EXERCISE OF THE RIGHTS OF THE INTERESTED PARTY", the rights referred to in art. 15 of the Regulation and in particular:

1. obtain confirmation of the existence or not of personal data concerning you, even if not yet registered and their communication in an intelligible form;
2. obtain the indication: a) of the origin of the personal data; b) of the purposes and methods of treatment; c) of the logic applied in case of treatment carried out with the help of electronic tools; d) of the identification details of the owner, of the managers and of the designated representative

pursuant to art. 3, paragraph 1, GDPR; e) of the subjects or categories of subjects to whom the personal data may be communicated or who can become aware of them as appointed representative in the territory of the State, of managers or agents;

3. obtain: a) updating, rectification or, when interested, integration some data; b) the cancellation, transformation into anonymous form or blocking of the data processed in violation of the law, including those that do not need to be kept in relation for the purposes for which the data were collected or subsequently processed; c) certification that the operations referred to in letters a) and b) have been brought to the attention, even to the extent concerns their content, of those to whom the data have been communicated or disseminated, except the case in which this fulfillment proves impossible or involves the use of means manifestly disproportionate to the protected right;

4. object, in whole or in part: a) for legitimate reasons to the processing of personal data that The concern, even if pertinent to the purpose of the collection; b) to the processing of personal data that concern you for the purpose of sending advertising or direct sales material or for the carrying out market research or commercial communication, through the use of automated call systems without the intervention of an operator by e-mail and / or through traditional marketing methods by telephone and / or paper mail. It is done note that the data subject's right to object, set out in point b) above, for direct marketing purposes through modalities automated systems extends to the traditional ones and which in any case remains the possibility for the interested party to exercise the right to object even only partially. Therefore, the interested party can decide to receive only communications using traditional methods or only communications automated or neither of the two types of communication. Where applicable, he may also exercise the rights referred to in Articles. from 15 to 21 of the GDPR (Right to rectification, right to be forgotten, right to limitation of processing, right to data portability, right to opposition), as well as the right of complaint to the Guarantor Authority.

## **WHAT DATA DO WE PROCESS?**

### **1. Navigation data**

the computer systems and software procedures used to operate this website acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols. This is information that is not collected to be associated with identified interested parties, but who by their very nature could, through processing and association with data held by third parties, allow to identify the users. This category of data includes the IP addresses or domain names of the computers used from users who connect to the site, the addresses in URI notation (Uniform Resource Identifier) 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 relating to the operating system e to the user's computer environment. These data are used for the sole purpose of obtaining anonymous statistical information on the use of the site and to check its correct functioning e they are deleted immediately after processing. The data could be used for ascertaining responsibility in the event of hypothetical computer crimes against the site.

## **2. Data provided voluntarily by the user**

Following optional, explicit and voluntary consent expressed in advance by the interested party to the use of this service, if integrated into this site, or to the addresses indicated on this site, ITACA s.r.l. will collect and store the data received, including the e-mail address, for the time necessary to respond to requests, for the purpose of exchanging information or contacts. Specific summary information will be progressively reported or displayed on the pages of the site prepared for particular services on request or for particular categories of data.

## **3. Cookies**

For information on the cookies policy adopted, see the information specific. ITACA s.r.l.

### **DO YOU PROCESS DATA RELATING TO MINORS?**

As a general rule, we do not intentionally collect personal data relating to minors. If we become aware of the fact that we have inadvertently collected personal data of such subjects, we will take action to delete such data as soon as possible, except where required by law applicable request to keep them.

### **OPTIONAL PROVISION OF DATA**

Apart from that specified for navigation data, the user is free to provide personal data reported in the application forms or indicated in contacts to request the sending of material information or other communications. Failure to provide them may make it impossible to obtain what is requested. For the sake of completeness it should be remembered that in some cases (not object of the ordinary management of this site) the Authority may request news and information pursuant to art 157 of Legislative Decree no. 196/2003, for the purpose of controlling the processing of personal data. In these cases the reply is mandatory under penalty of an administrative sanction.

### **REDIRECT VIA SOCIAL PLUG-IN**

It is possible to use the so-called social plug-in. Social plug-ins are special tools that allow you to incorporate the features of the social network directly within of the Site (for example the "like" function of Facebook). All social plug-ins on the Site are marked by the respective logo owned by the social network platform. When you visit a page of the Site and interact with the plug-in (eg by clicking the "mi like ") or you decide to leave a comment, the corresponding information is transmitted by browser directly to the social network platform (in this case Facebook) and from this stored. For information on the purposes, type and methods of collection, processing, use and storage of personal data by the social network platform, as well as for the how to exercise your rights, please consult the relevant privacy policy social network.

## LINKS TO THIRD PARTY SITES

From our sites it may be possible to connect through specific links to other third party websites. ITACA s.r.l. does not control or monitor such websites and their contents. THE our sites provide links to these sites solely to facilitate the User in research and own navigation and to facilitate hypertext links on the Internet to other sites. The activation of the links does not imply any recommendation or report from ITACA s.r.l. for access and navigation on these sites, nor any guarantee regarding their contents, services or goods provided by them and sold to Users. Therefore, any responsibility regarding the contents of these sites and the rules adopted by them, also with regard to the protection of personal data and related processing when browsing the sites in question.

## USE AND METHOD OF DATA PROCESSING

**1. Data collected online** Following consultation of this site, they may be processed data relating to identified or identifiable persons. The provision of data is optional, however the same could in some cases be indispensable for the performance of specific activities and therefore, failure to provide it, entails for ITACA s.r.l. a impediment to the provision of services and information. Failure to provide all data except those that are not attributable to legal, fiscal and contractual obligations will be evaluated by the writer from time to time and will determine the consequent decisions, reported the importance for the writer of the data requested and not provided. In particular, for the purposes defined in point "

**2. Data provided voluntarily** by the user, will be asked to express the free and informed consent to the processing of data, by specific signing of a specific documentation drawn up individually for each treatment envisaged. Personal data may be communicated by the Data Controller exclusively for the achievement of specific purposes indicated in this information to internal and external subjects organization, which will process your data in accordance with the instructions received from Company as managers, agents, system administrator or in total autonomy, as separate owners. The internal subjects are the managers or persons in charge of the treatment belonging to the administration and company accounting area. Subjects external collaborators are external collaborators such as: managers or persons in charge of processing, services postal and shipping, banking institutions, law firms, accounting and tax consultancy firms, information systems management services, information systems maintenance services, as well as all the subjects to whom the right of access to the data and / or the obligation to communicate is recognized by virtue of regulatory provisions or the judicial authority. **No data is communicated or disseminated unless expressly specified in the information drawn up for specific treatments for which you will be asked to express explicit e separate consent to the interested party.** Likewise, should it prove necessary the acquisition of sensitive data will be required to provide explicit and separate consent to the interested party. The technical data for accessing the Site, as well as those collected from any e-mails sent by you, will not, in any case, be disclosed to third parties, nor will they be subject to diffusion.

**3. Data collected for the execution of the services offered by our site** The collection and processing of the User's personal data will take place in compliance with the general principles of necessity, correctness, relevance and non-excess and in particular the processing of data will take place to answer questions and provide the information requested by the User using the references in the CONTACTS area of the site; to contact the User himself regarding the services provided by ITACA srl; For the necessary and indispensable treatments of character operational, managerial, accounting and other nature, in particular some data will be used for the registrations and communications required by law

4. subject to the express consent of the User, also for functional purposes commercial / promotional such as commercial communications, sales, sending of material advertising or for carrying out market research.

### **EXERCISE OF THE DATA SUBJECT'S RIGHTS**

The interested party may at any time exercise the rights towards the Data Controller provided for by Chapter III of the Regulations, by contacting ITACA s.r.l. with registered office and operational headquarters in Via Sandro Pertini 12 - 63812 Montegranaro by email to the address: [info@itacasw.it](mailto:info@itacasw.it)

**CHANGES** ITACA s.r.l. reserves the right to modify or simply update the content of this document Privacy Policy, in part or completely, also due to changes in the law applicable. ITACA s.r.l. It will inform you of such changes as soon as they are introduced and they are they will be binding as soon as they are published on the website. ITACA s.r.l. He therefore invites you to visit with regularity of this section to become aware of the most recent and updated version of the Privacy Policy in order to always be updated on the data collected and on the use made of it ITACA s.r.l. Last updated May 31, 2019

### **COOKIE POLICY IN COMPLIANCE WITH THE PROVISION OF 08/05/2014 No. 229 OF THE GUARANTOR OF PRIVACY**

The Privacy Guarantor has transposed the European Directive 2002/58 / EC which imposes, in some cases, the administrators of the web pages, to show visitors a banner informing them of which one both the policy of cookies, of the site they are consulting and to subordinate its acceptance to continuation of navigation. This information is provided for visitors and users of the site [www.itacasw.it](http://www.itacasw.it) owned by ITACA s.r.l. and not for other websites that may be consulted by the user through internal links.

#### **1. WHO IS THE HOLDER OF THE TREATMENT?**

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#### **2. WHAT ARE COOKIES?**

Cookies are text files that a website sends to the Users' terminals and that allow the owner of the site to store some data transmitted by the browser used by the User during navigation. Cookies are used to perform computer authentication, monitor sessions and store specific information regarding Users who access the server and, as a rule, they are present in the browser of each User in a very large number. Through cookies, the Site can,

among other things, carry out an analysis of the habits of a particular User in order to adapt the services offered through the site to your needs, or to facilitate it during the activity navigation (for example, by storing the User's username and password so that they do not must re-enter them each time you access the Site). This Cookie Policy also governs any use of technologies by the Site similar to cookies, such as pixel tags and web beacons, or that type of technology, often used together with cookies, found within a website as well as in the body of an e-mail, for the purpose to track activities on websites or the opening of e-mails.

### **3. WHAT ARE THE TYPES OF COOKIES USED BY THE SITE AND FOR WHAT PURPOSE?**

The Site uses only technical cookies.

### **4. HOW IS IT POSSIBLE TO EXPRESS THE PREVENTIVE CONSENT TO THE USE OF COOKIES?**

Navigation Cookies are "technical" cookies necessary for the correct functioning of the Site. Analytical cookies are not necessary for the functioning of the Site but, pursuing exclusively for statistical purposes and by collecting information in aggregate form, processed by ITACA s.r.l. anonymously, they can be used even in the absence of prior consent of the User. That said, each User can, however, choose to disable the Navigation Cookies and Analytical Cookies, by changing the settings of your browser, it being understood that, in this case, certain functions of the Site will not be available. The direct links to the internet pages of the main browsers where the user can adjust their cookie preferences: Internet Explorer: <https://support.microsoft.com/help/17442/windows-internet-explorer-delete-manage-cookies> Mozilla Firefox: <http://support.mozilla.com/en-US/kb/Cookies> Google Chrome: <http://www.google.com/support/chrome/bin/answer.py?hl=en&answer=95647> Safari: <http://support.apple.com/kb/PH5042> Opera: <http://www.opera.com/browser/tutorials/security/privacy/> Adobe (flash cookies): <http://www.adobe.com/privacy/policies/flash-player.html> Blocking all cookies will have a negative impact on the usability of many websites. If the cookies, it will not be possible to use all the functions of our website.

### **5. EXERCISE OF THE DATA SUBJECT'S RIGHTS**

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### **6. UPDATING OF THIS POLICY**

This Cookie Policy may be modified or simply updated, in whole or in part, also in consideration of the modification of the laws or regulations governing the personal data protection. Changes and updates to this Privacy Policy will be made known to Users as soon as they are adopted and will be binding as soon as they are published on the Site. ITACA s.r.l. therefore invites Users to regularly access this page for check the publication of the most recent and updated version. For this purpose the document highlights the update date.

Last updated 28 September 2020