



## WEB PRIVACY POLICY

Web privacy policy to be provided pursuant to the Legal Decree 196/2003 and Art. 13, EU Reg. 2016/679 (GDPR)

### 1. Identity and contact information for data controller

The data controller is Raphael Dal Bo AG (below: "Raphael Dal Bo" or "the Owner"), with registered office at Hinterwacht 8 – 8807 Freienbach, CH-020.4.027.083-2.

### 2. Category of personal data, purpose of processing, legal basis

#### NAVIGATION DATA

The computer systems and software procedures that operate the site acquire certain personal data that is implicitly transferable in the use of Internet communication protocols. Although this information is not collected to be associated with identified users, it could, by its very nature, through processing and association with data held by third parties, allow users to be identified.

This data category includes the IP addresses or domain names of the computers used by users connecting to the site, the Uniform Resource Identifier (URI) notation addresses of the requested resources, the time of the request, the method used to submit 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 related to the operating system as well as the User's IT environment.

This data is utilized for the purpose of obtaining anonymous statistical information about use of the site and to check the site's proper functioning. The data could also be used to ascertain liability in case of computer crimes against the site.

The processing takes place in pursuit of the Data Controller's legitimate interest in ensuring the correct functioning of the site (art.6, 1 co., lit. f) GDPR.

#### COOKIES

Cookies are short fragments of text (letters and/or numbers) that allow the web server to store information on the client (the browser). The information can be used during an ongoing visit to the site (session cookies) or a day, or several days later (persistent cookies).

Cookies are stored by the individual browser on the specific device used (computer, tablet, smartphone), according to the User's preferences.

This site uses different types of cookies:

- Strictly necessary cookies help to make a website usable by enabling basic functions such as page navigation and access to the protected areas of the site. The website cannot function properly without these cookies (art. 6, 1 co., lit. f) GDPR).
- Preference cookies allow a website to recall information that influences how the site behaves or presents itself, such as the preferred language or region in which the user is located (art. 6, 1 co., lit. a) GDPR).
- Statistical cookies help website managers understand how visitors interact with sites by collecting and transmitting information anonymously (art. 6, 1 co., lit. a) GDPR).



- Marketing cookies are used to monitor visitors on websites. The intent is to display ads that are relevant and engaging to the individual user, and which are therefore more valuable to third-party publishers and advertisers (Art. 6, 1 co., lit. a) GDPR).

This website uses different cookies. Some cookies that appear on the pages of the site are placed by third-party services. At any time you may change or withdraw your consent through the "Declaration of Cookies" form which appears on our website.

### **CONTACT FORMS OR EMAILS**

While browsing certain parts of the site, users may see a contact form to receive information from Raphael Dal Bo S.p.A. In addition, the optional, explicit and voluntary sending of an e-mail to addresses indicated on this site involves the subsequent acquisition of the sender's email address (needed for responding to requests), as well as any other personal data provided in the user's letter. This data may also be used for the creation of an archive for the purpose of sending e-mails about legitimate proposals or future initiatives by Raphael Dal Bo S.p.A. based on legitimate interest (art.6, co.,let.f) GDPR).

### **3. Length of time data is stored**

Navigation data is stored for short periods of time, with the exception of any extensions related to investigation activities or for the assessment of liability in case of hypothetical computer crimes against the site. Cookies are stored according to the "Declaration of Cookies". Data collected through contact forms or received by email will be kept for as long as necessary to fully respond to requests.

### **4. Data processing**

Personal data is processed by the Data Controller in predominantly electronic ways: it is stored on servers within the controller's corporate management system and/or third-party companies appointed and duly appointed as Data Processors. Appropriate security measures are observed to prevent data loss or alteration (including accidental), unlawful or incorrect uses and unauthorized access.

### **5. Scope of data communication**

Where appropriate, and in accordance with applicable laws and requirements, we may transmit your personal data in various ways and for various reasons to the following categories of end-users:

- External service providers acting on our behalf (including external consultants, business partners and professionals, IT consultants and technical support personnel who carry out audits and development activities on our IT systems);
- External providers of IT services and data analysis, as well as ADV and social digital marketing services acting as our external managers, who have been appointed as such on the basis of art.28 GDPR, or autonomous owners.

### **6. Place of processing and transfer of data in non-EU countries**

Processing, including storage, of personal data takes place on servers owned by Raphael Dal Bo and/or third-party companies in charge, and duly appointed as data processors, located within the European Union. However, personal data may be transferred to third countries, mainly for analysis and digital and social marketing services, or to social networks platforms. Such transfers are carried out in accordance with the



contractual clauses referred to in the Decision of the European Commission of 5 February 2010 for the transfer of personal data to managers located in third countries, in compliance with the requirements of art. 46, GDPR and, where applicable for compliance with contractual obligations of which it is part of the interested party, in compliance with the provisions of art. 49, paragraph 1, point b), GDPR.

## **7. Rights of data subjects pursuant to Articles 15 to 22, GDPR**

You have the right to contact the to the Data Controller Raphael Dal Bo S.p.A., a data subject can exercise the rights to:

- access (art.15, GDPR), rectification (art.16, GDPR),
- cancellation (art.17, GDPR),
- limitation of processing (art.18, GDPR),
- notification in case of correction or cancellation (art.19, GDPR),
- data portability (art.20, GDPR), withdrawal of consent,
- opposition to processing (art.21, GDPR) for legitimate reasons or for sending marketing and direct sales communications, even limited to one or more modes of contact (e.g. by post and/or e-mail and/or telephone),
- as well as to oppose profiling (art.22, GDPR) if connected to direct marketing. At any time, the data subject may request a complete and up-to-date list of data controllers and third parties to whom personal data may be disclosed.

## **8. Complaint to the Supervisory Authority**

The data subject has the right to lodge a complaint with the Supervisory Authority, which in Italy is the Guarantor for the Protection of Personal Data – Piazza Venezia 11, 00187 Rome (RM)– [www.garanteprivacy.it](http://www.garanteprivacy.it), sending emails to [protocollo@pec.gpdp.it](mailto:protocollo@pec.gpdp.it), using the form available on the Authority's website.

## **9. Data Protection Officer**

The Data Protection Officer can be contacted at [dpo@enoitalia.it](mailto:dpo@enoitalia.it) for information on data processing.