

SITE TRACKING MEDIA DISCLOSURE

This policy (hereinafter, for simplicity "**Cookie Policy**") governs the processing of your personal data while browsing the website www.paglieri1876.it ("**Site**"), through the use of cookies and other tracking tools, carried out by **Selectiva S.p.A**, headquartered in SS 10 for Genoa, km 98 - 15122 Alessandria, P. IVA 01893510063, email privacy@selectiva-spa.it ("**Data Controller**"), in accordance with applicable data protection regulations, including EU Regulation 2016/679 ("**GDPR**") and Directive 2002/58/EC ("**Directive**") and any subsequent amendments.

1. Identity and contact information of the Representative

As the Holder is established in the territory of the EU, no representative has been appointed.

2. Contact details of the data protection officer

The Owner has not appointed a Data Protection Officer ("**DPO**") pursuant to Article 37 GDPR.

3. Means and purpose of processing

Navigation data

In order to complete the connection to the Site, some of your personal data is acquired. This set of data includes, for example:

- The IP address of the device you are using;
- The date and time of access;
- The type of browsing browser;
- The operating system used.

Cookie

Cookies are small text files that are downloaded to your device when you visit the Site. They are used to improve your user experience. Cookies can remember your preferences, such as language or Site settings, to make subsequent visits to the Site easier and more personalized.

Cookies can be classified in various ways:

- Based on the duration of information storage:
 - **Session cookies**: these are temporary and are deleted each time you close the browser.
 - **Persistent cookies**: these stay on your device until you delete them or until they expire.
- Depending on who manages the cookies:

- **First-party** cookies: these cookies are installed and managed directly by the Owner.
- **Third-party cookies**: these are installed by other websites that provide various services to generate to the Site. In other words, such cookies are managed by websites other than the one you are visiting.
- Based on the functional purpose of the cookie:
 - **Technical cookies**: cookies in this category allow the Site to function properly
 - **Statistical cookies**: cookies in this category allow statistical analysis related to different domains, websites or apps that can be traced back to the Owner itself.
 - **Marketing cookies**: cookies in this category allow the Owner to carry out marketing activities.
 - **Profiling cookies**: cookies in this category allow the Owner to track information about you in order to provide you with services tailored to your needs and preferences.

The list of cookies used by the Owner within the Site with indication of the: type, description of functionality and duration can be accessed via the appropriate menu in the Cookie Banner.

4. Delete and disable cookies

You can configure your browser to prevent the processing of cookies, or delete them immediately after browsing. Below, we list how to disable and delete cookies with the major browsers:

Delete/deactivate cookies with Firefox	http://support.mozilla.com/it/kb/Eliminare%20i%20cookie
Delete/deactivate cookies with EDGE	https://support.microsoft.com/en-us/microsoft-edge/delete-cookies-in-microsoft-edge-63947406-40ac-c3b8-57b9-2a946a29ae09
Delete/disable cookies with Chrome	http://support.google.com/chrome/bin/answer.py?hl=it&answer=95647

5. Legal basis of processing and optionality of consent

- a) **Personal data processed while browsing the Site**: the disclosure of such personal data is a contractual obligation, without which the Site's own services could not be made available properly functioning.

- b) **Personal data processed with technical cookies:** the disclosure of personal data is a contractual obligation, without which the Site's own services could not be made available properly functioning.
- c) **Personal data processed with statistical cookies:** the disclosure of personal data is purely optional. In case of your failure to express your consent to the communication of such data, it will be impossible for the Controller to carry out this tracking activity. The legal basis for the processing is your consent, expressed in accordance with current legislation.
- d) **Personal data processed with *marketing* cookies:** the disclosure of personal data is purely optional. In case of your failure to express your consent to the communication of such data, it will be impossible for the Controller to carry out such tracking activity. The legal basis for the processing is your consent, given in accordance with current legislation.
- e) **Personal data processed with profiling cookies:** the disclosure of personal data is purely optional. In case of your failure to express your consent to the communication of such data, it will be impossible for the Controller to carry out this tracking activity. The legal basis for the processing is your consent, expressed in accordance with current legislation.

You may consent to the processing of personal data through the means of tracking described in this Cookie Policy by clicking on specific boxes within appropriate banners.

6. Profiling

If you consent to processing by tracking means to enjoy personalized services, your personal data may be subject to automated decision making, with one or more specific algorithms deciding which communications best fit your profile or which might be of interest to you.

7. Source from which personal data originate and categories of data

The Data Controller will only process personal data provided by you in accordance with the Cookie Policy, collected through the Site. The Controller will not process data from publicly accessible sources. The Controller will not process special personal data referred to in Article 9 of the GDPR.

8. Recipients and possible categories of recipients of personal data

They may receive your personal information:

- Companies that offer hosting services;

- Companies offering information society services, including, in particular, those offering hosting services;
- companies conducting statistical and market surveys, if the relevant consent has been given.

9. Transfer of personal data

The Data Controller intends to transfer Personal Data to entities established in a country outside the European Union or an international organization. Such entities could be represented, by way of example, by:

- Communications companies that perform communications activities on behalf of the Holder;
- Companies offering information society services;
- Companies that offer hosting services;
- Companies that provide third-party cookies.

The transfer of personal data to such entities, when established in a third country or an international organization, is made in the presence of an adequacy decision of the European Commission, which has verified how the third country, the territory or one or more specific sectors within the third country, or the international organization in question guarantee an adequate level of protection of rights. In any case, the Data Controller, if it nevertheless deems it appropriate, reserves the right to enter into specific separate agreements obliging such entities to take appropriate security measures, including organizational measures, designed to provide appropriate safeguards for your rights. Personal data may thus be transferred to the following countries: U.S.A.. To obtain a copy of such data or the place where it has been made available, simply send the relevant request to the Data Controller, at the addresses in above.

10. Period of retention of personal data

- a) **Personal data processed while browsing the Site:** the Data Controller will retain your personal data processed while browsing the Site for a period not exceeding 12 (twelve) months from the date of individual collection;
- b) **Personal data processed with technical cookies:** the Data Controller will retain your personal data processed with technical cookies in order to allow you to properly use the Site for a period not exceeding 12 (twelve) months from the date of individual collection;
- c) **Personal data processed with statistical cookies:** the Owner will retain your personal data processed to make personalized services available through statistical cookies for a period not exceeding 12 (twelve) months from the date of individual collection;

- d) **Personal data processed with marketing cookies:** the Data Controller will retain your personal data processed to make personalized services available through marketing cookies for a period not exceeding 12 (twelve) months from the date of individual collection;
- e) **Personal data processed with profiling cookies:** the Data Controller will retain your personal data processed to make available personalized services through profiling cookies for a period not exceeding 12 (twelve) months from the date of individual collection.

The Holder reserves the right, in any case, to ask you to renew and/or verify the consents expressed.

11. Right of opposition

As a "data subject," you have the right to object at any time, on grounds relating to your particular situation, to the processing of personal data relating to you under Article 6(1)(e) or (f) of the GDPR, including profiling on the basis of these provisions.

The Controller shall refrain from further processing your personal data, unless the Controller itself demonstrates the existence of compelling legitimate grounds for processing that override your interests, rights and freedoms or for the establishment, exercise or defense of a legal claim.

Where personal data is processed for direct marketing purposes, you have the right to object at any time to the processing of personal data about you carried out for such purposes, including profiling insofar as it is related to such direct marketing.

If you object to processing for direct marketing purposes, your personal data are no longer processed for such purposes.

You may object to the processing of your personal data for direct marketing purposes even in part, for example by objecting only to the sending of promotional communications carried out by automated and/or digital means, or to the sending of paper communications and/or the receipt of telephone communications.

Where your personal data are processed for scientific or historical research purposes or for statistical purposes pursuant to Article 89(1) of the GDPR, you have the right, on grounds relating to your particular situation, to object to the processing of personal data concerning you, unless the processing is necessary for the performance of a task carried out in the public interest.

12. Other Rights

The Holder would also like to inform you of the existence of your following rights:

- **Right of access:** you have the right to obtain confirmation from the Data Controller as to whether or not personal data concerning you is being processed. If so, you have the right to access your personal data and specific information, in accordance with Article 15 of the GDPR;
- **Right of rectification:** you have the right to obtain from the Controller the rectification of inaccurate personal data concerning you without undue delay. Taking into account the purposes of the processing, you have the right to obtain the integration of incomplete personal data, including by providing a supplementary declaration, in accordance with Article 16 of the GDPR;
- **Right to erasure:** you have the right to obtain from the Data Controller the erasure of personal data concerning you without undue delay. The Data Controller has an obligation to erase personal data without undue delay if there are grounds listed in Article 17 of the GDPR;
- **Right to restriction of processing:** you have the right to obtain from the Controller the restriction of processing, if there are grounds listed in Article 18 of the GDPR;
- **Right to data portability:** you have the right to receive in a structured, commonly used and machine-readable format, personal data concerning you provided to the Data Controller, such as the right to transmit such data to another data controller without hindrance from the Data Controller, in the cases and under the conditions specified by Article 20 of the GDPR;
- **Right to object to commercial communications:** you have the right to object at any time, free of charge, to receiving commercial communications from the Holder;
- **Rights in relation to profiling:** you have the right to obtain human intervention by the Controller, to express your opinion and to challenge the decision, in accordance with Article 22 of the GDPR;
- **Right to lodge a complaint** with the Data Protection Authority: you have the right to lodge a complaint with the Data Protection Authority, to complain about a violation of data protection regulations, in accordance with Article 77 of the GDPR.

13. How to exercise your rights

You may exercise the rights set forth in the Cookie Policy by addressing instances directly to the Owner at the email address privacy@selectiva-spa.it, or by sending the relevant notice by registered mail with return receipt to the registered office of the Owner as indicated above.

You may lodge a complaint with the Data Protection Authority in the manner provided on the official website, addressing it to the contact details available at <https://www.garanteprivacy.it/home/footer/contatti>.

14. Accessibility

The Cookie Policy can be accessed within the Site and at the offices of the Owner.

15. Changes

The Owner may change the Cookie Policy, including to comply with national and/or European Union legislation or technological innovations. Any new versions of the Cookie Policy will be posted on the Site. We encourage you to check the Cookie Policy periodically. Any changes will still be communicated to you through a pop-up on the Site or different modalities and/or computer tools. If The Data Controller substantially modifies the Cookie Policy, providing for new processing purposes and/or categories of personal data processed or changing the third parties, The Data Controller itself will inform you, requesting the necessary consents, by means of a special banner. If it is impossible for The Controller to verify that cookies have been stored on your device, on your next visit to the Site, for example in the event of deletion of the cookies installed, The Controller itself will inform you, requesting the necessary consents, by means of a specific banner. If at least 6 (six) months had elapsed since the previous presentation of the banner on the Site, the Data Controller itself will inform you, requesting the necessary consents, by means of a special banner.