

PRIVACY POLICY pursuant to GDPR 679/2016

Data **controller**: Ghidini Cipriano S.r.l. located in via Ponte Gandovere nr. 51 - 25064 Gussago (BS)

pursuant to Articles 4 and 28 of Legislative Decree. 30 June 2003, n. 196 - Privacy Code (hereafter "Code") and Articles 4, n. 7) and 24 of EU Regulation 2016/679 of 27 April 2016 on the protection of natural persons in relation to the processing of personal data (hereafter "Regulation") pursuant to Article 13 of the Code and the Regulation informs the user that for the establishment and execution of ongoing relationships with the user, personal data (personal and tax) are available.

In order to comply with the obligations set out in the Code and community privacy regulations in relation to your data, we invite you to take note of the following information and consent to the processing of personal data that our company will acquire.

1. INFORMATION COLLECTED

We collect only information that is necessary, relevant and appropriate for the purpose for which it is provided. The information we collect may include some or all of the following:

- **Identity data:** name, surname, username or similar identifier and title.
- **Contact information:** billing address, delivery address, email address and phone numbers.
- **Financial data:** bank account and payment card data collected solely for the purpose of completing the purchase.
- **Transaction data:** payment details and other details about products and services purchased or sold.
- **Profile data:** purchases or orders placed, any social profiles (if applicable), preferences, feedback, communications and responses to internal surveys, password and username, if applicable (customer portal).
- **Usage data:** information on how the website, products and services are used.
- **Marketing and communication data:** preferences in the reception of third-party marketing and communication and communication preferences.
- **Technical data:** Internet Protocol (IP) address, login data, browser type and version, time zone setting and browser plug-in location, types and versions, operating system and platform, and other technologies on devices used to access corporate websites.

2. USE OF INFORMATION

Only the information necessary for the following purposes is processed:

1. Operational management and purposes closely related to this for access to the website.

The Company collects contact data, funded and the use of the website to allow you to access the Personal Area, where present, and proceed with the orders of the affected products and/or services.

Prerequisite for processing: fulfillment of contractual obligations.

The provision of data is mandatory to respond to your requests; in the absence that we will not be able to give you a run.

2. Customer satisfaction surveys

The Company may use contact data to conduct surveys aimed at measuring the level of satisfaction (so-called customer satisfaction) of the service provided.

Prerequisite for processing: consent. failure to comply has no consequences on contractual relationships.

Consent can be revoked at any time by writing to the following address: patrizia.bugatti@ghidinicipriano.it

3. Marketing

The Company may process contact data for marketing and advertising communication purposes, aimed at informing the User about promotional sales initiatives, carried out through automated contact methods (e-mail, sms and other mass messaging tools, etc.) and traditional methods of contact (for example, phone call with operator) or for market research and statistical surveys.

Prerequisite for processing: consent. Failure to comply has no consequences for contractual relations.

Consent can be revoked at any time by writing to the following address: patrizia.bugatti@ghidinicipriano.it

4. Compliance with legally binding requests to comply with a legal obligation, regulations or provisions of the judicial authority, as well as to defend a right in court

The Company collects contact data to fulfill a legal obligation and/or to defend its right at the
Prerequisite for processing: legal obligations, which the Company is required to comply with.

3. SHARING

We do not share information with third parties, however, we may occasionally disclose information to the following categories of companies or organizations to which we are responsible for managing services on our behalf: support service providers, customer contact centers, direct marketing agencies and consultants, market research service providers, and market analysis, legal advisors and other professionals.

We are committed to ensuring that all third-party partners who processing information comply with data protection legislation and protect information just as we do. We only provide them with the personal information STRICTLY necessary to provide the service they are undertaking on our behalf.

We will anonymize the information or use specific aggregated datasets where possible.

4. STORAGE CONDITIONS

We do not store personal information in an identification format longer than necessary.

For customers or suppliers, we store personal information for a longer period than processing potential customers/suppliers.

In the case of an ongoing relationship (e.g. a customer), we maintain personal information for 10 years from the date of the last transaction, in order to establish, bring or defend any legal claims.

Promotional and marketing information will be stored for a maximum period of 24 months.

5. STORAGE

The personal data we collect may be transferred and stored in a destination outside the European Economic Area (EEA), for the purposes described above. We will take all reasonable steps to ensure that personal data is processed securely and in accordance with this Privacy Policy and data protection legislation. To the extent that it is necessary to transfer personal data outside the European Union, we will ensure the adoption of appropriate protection measures to protect the privacy and integrity of such data, including the European Union model clauses under Article 46 'Transfer subject to adequate safeguards'.

6. BISCUITS

Cookies are text files that identify your computer (via the so-called IP address) on our server. For information about why we use it, please refer to the "How we use the information we collect" section of this Privacy Policy. We do not use the IP address as a means of identifying you. In general, there is the possibility to set your computer to accept all cookies, to be informed when a cookie is issued or not to receive cookies at all times, this is possible through the Internet browser. With most browsers, this feature can be achieved through the "tools" menu (e.g. Internet Explorer), "edit", or "task". If you have trouble finding this area, the "help" feature within your browser will be able to help you. You can also find more detailed information about cookies and how to manage them <http://www.allaboutcookies.org>.

The rejection of cookies could prevent the proper functioning of the site or even prevent access to certain areas.

6.1. HOW DO WE USE COOKIES?

Depending on the function and purpose of use, cookies can be classified into technical cookies, analytical cookies, profiling cookies. All cookies are divided into proprietary cookies, installed directly by the site manager and third-party cookies, installed through the site by third parties.

Based on the characteristics and use of cookies, we can distinguish different categories:

- 1. The navigation cookies** on the site trace the path of cookies (the so-called "click stream" activity, or the registration of the paths followed by visitors to a site when they pass from page to page) without being able to know or identify the user, in order to collect statistical data on the site such as, for example, the pages visited, downloaded and t c.

We reiterate that none of this information is associated with you individually. Cookies do not acquire your personal email address or any of your private information. The information obtained from cookie tracking is evaluated only as a whole. Web server log files are also used to count visitors and evaluate the technical capabilities of our site in order to facilitate

navigation on the site and make its pages more useful to users. We collect information about site traffic, but not about individual visitors.

2. Session cookies are strictly necessary to provide you with the services available through our website and to use some of its features.

Since these cookies are strictly necessary, it is not possible to reject them without affecting the functioning of our website, but it is possible to block or delete them by changing browser settings and forcing the blocking of all cookies on this website.

3. Google Analytics cookies collect information that is used in aggregate form to help us understand how our website is used or the effectiveness of our marketing campaigns or to help us customize the site in order to improve your experience.

4. Profiling cookies create user profiles and are used to send advertising messages in line with the preferences expressed by the user while browsing the web:

a. The cookies collected for the purposes listed above can be communicated to the competent subjects in charge of the management of the site for the performance, even in part, of the activities related to the assignment.

b. For all cookies other than technical cookies, the user's express consent is required the first time he visits the site. Consent is monitored on subsequent visits, however the user always has the possibility to revoke the consent already expressed in whole or in part.

6.2. DURATION

Some cookies (session cookies) remain active only until the browser is closed. Other cookies (persistent cookies) "survive" when the browser is closed and are also available on subsequent visits by the user and their duration is set by the server at the time of their creation with a predetermined expiration date.

The setting can be defined specifically for different websites and web applications. In addition, the most common browsers allow you to define different settings for various types of cookies.

You can set your browser to be notified in case of attempts to insert cookies, limitation or complete rejection.

7. RIGHTS OF THE PERSON CONCERNED

The data subject may assert his rights, as provided for in Articles 15-23 GDPR in particular:

- Request a copy of the information we have in our possession;
- Correct and update information;
- Revoke consent;
- Right to object and request the deletion of data or limitation of use, where there are no legitimate reasons to continue to use and process your information and/or in the absence of consent to direct marketing activities;
- Right to data portability;
- Right to lodge a complaint with the competent supervisory authority (Privacy Guarantor).

You can exercise these rights and/or manage the information by contacting us at the following references:

Post office: via Ponte Gandovere nr. 51 - 25064 Gussago (BS)

Email: patrizia.bugatti@ghidincipriano.it

In case of request for access or information, we inform you that, if the request is unfounded or excessive, we may charge a fee or refuse to act.

8. CHANGES TO THIS PRIVACY POLICY

Chidini Cipriano S.r.l. reserves the right to modify the content, in part or in full, also due to regulatory updates. The updated version of this Policy will be published on the website, so please visit this section regularly.