

# PRIVACY INFORMATION GDPR

provided pursuant to Article 13 of EU Reg. 2016/679 (hereinafter GDPR)

# 1) Premise

This information is provided pursuant to Article 13 of EU Reg. 2016/679 (hereinafter "GDPR"), with the aim of providing the visitor of the site (hereinafter "User") with basic information on the processing of his personal data. This information does not concern other sites, pages or online services accessible via hypertext links, possibly published on the site, but referring to resources external to the domain <a href="https://www.frontoni.net/">https://www.frontoni.net/</a>

# 2) General Information

The interested parties are informed of the following general profiles, valid for all areas of processing:

- all data are processed in compliance with current privacy regulations (EU Reg. 2016/679 and Legislative Decree 196/2003, as amended and supplemented by Legislative Decree 101/2018);
- all data are processed in a lawful, correct and transparent manner towards the data subject, in compliance with the general principles set out in Article 5 of the GDPR;
- specific security measures are observed to prevent data loss, illicit or incorrect use and unauthorized access (GDPR, Article 32).

# 3) Data Controller

The Data Controller is the undersigned Company (in the person of the pro-tempore legal representative), who can be contacted for any request regarding privacy or to exercise the rights listed below, at the following contact details.

- Frontoni Maurizio Sas P.IVA: 00910160332
- Address: Via Besenzone, 7/B 29016 Cortemaggiore (PC)
- Email: <u>frontoni@frontoni.net</u>
- Phone: 0523.839959

# 4) Data Subject's Rights

- Right to request the presence and access to personal data concerning him (Art.15 "Right of access")
- Right to obtein the correction/integration of inaccurate or incomplete data (Art.16 "Right to rectification")
- Right to obtain, if justified reasons exist, the cancellation of data (Art.17 "Right of erasure")
- Right to obtain the limitation of treatment (Art.18 "Right to restriction of processing")
- Right to receive data concerning him in a structured format (Art.20 "Right of Data Portability")
- Right to object to processing and automated decision-making, including profiling (Art.21, 22)
- Right to revoke a previously given consent;
- right to submit, in case of lack of response, a complaint to the Data Protection Authority

#### 5) Navigation Data

The information systems and software procedures relied upon to operate this web site acquire personal data as part of their standard functioning; the transmission of such data is an inherent feature of Internet communication protocols. Such information is not collected in order to relate it to identified data subjects, however it might allow user identification after being processed and matched with data held by third parties. This data category includes IP addresses and/or the domain names of the computers used by any user connecting with this web site, the URI (Uniform Resource Identifier) addresses of the requested resources, the time of such requests, the method used for submitting a given request to the server, returned file size, a numerical code relating to server response status (successfully performed, error, etc.), and other parameters related to the user's operating system and computer environment.

<b>Purposes and lawfulness of processing</b> (GDPR-Art.13, c.1, lett.c)	These data are only used to extract anonymous statistical information on website use as well as to check its functioning. The data might be used to establish liability in case computer crimes are committed against the website (Data Controller's legitimate interest).
<b>Scope of communication</b> (GDPR-Art.13, c.1, lett.e,f)	The data may only be processed by internal personnel, duly authorized and instructed in the processing (GDPR-Art.29) or by the Processor of the web platform (appointed Data Processor, Art.28 GDPR) and will not be disclosed to other parties, disseminated or transferred to non-EU countries. Only in the case of an investigation they can be made available to the competent authorities.
Data retention (GDPR-Art.13, c.2, lett.a)	Data are usually kept for short periods of time, with the exception of any extensions connected to investigations.
Data provision (GDPR-Art.13, c.2, lett.f)	The data are not provided by the data subject but automatically acquired by the site's technological systems.



# 6) Cookies

The management of cookies is compliant with the relevant regulatory requirements:

- "Guidelines for cookies and other tracking tools" of 10 June 2021 (Published in the Official Gazette no. 163 of 9 July 2021);
- Guidelines 5/2020 on consent pursuant to regulation (EU) 2016/679, adopted by the European Data Protection Board.
- Trans-national agreements on extra-EU data flows, stipulated pursuant to Title V of the GDPR.

The user can verify, analytically, the types of cookies and set their preferences via the appropriate banner (if provided; if not provided it means that the site uses exclusively technical cookies). Below we provide some general information regarding cookies and similar technologies.

# 6.1) What are cookies

Cookies are short fragments of text (letters and / or numbers) that allow the web server to store information on the client (the browser) to be reused during the same visit to the site (session cookies) or later, even after some days (persistent cookies). Cookies are stored, according to user preferences, by the single browser on the specific device used (computer, tablet, smartphone). Similar technologies, such as, for example, web beacons, transparent GIFs and all forms of local storage introduced with HTML5, can be used to collect information on user behavior and on the use of services. In the remainder of this information we will refer to cookies and all similar technologies by simply using the term "cookie".

# 6.2) Possible types of first-party cookies and methods of managing preferences

CATEGORY	PURPOSE	PREFERENCE MANAGEMENT	CODING CRITERIA
Navigation or session technicians	Guarantee the normal navigation and use of the site	<ul> <li>Navigation is possible through the main browsers:</li> <li>Block the receipt of all (or some) types of cookies by default</li> <li>View the analytical list of cookies used</li> <li>Remove all or some of the installed cookies</li> <li>For information on setting individual browsers, see specific paragraph. Please note that blocking or deleting cookies could compromise the navigability of the site.</li> </ul>	All cookies used by this site are coded as technical cookies, aimed at making useful interaction tools available to the user (e.g. Google maps for the contact section). The Data Controller does not carry out any user profiling processing using the technologies of this site.
Analytical technicians	Collect information on the number of visitors and pages viewed		
Technical functionality	Allow navigation based on a series of selected criteria		
Profiling	Create user profiles in order to send advertising messages in line with preferences		

# 6.3) Management of preferences through the main navigation browsers

using the settings of his browser (we point out that, by default, almost all web browsers are set to automatically accept cookies). The setting can be changed and defined specifically for different websites and web applications. Furthermore, the best browsers allow you to define different settings for the best browsers and for "those" or "third parties". Usually, the configuration of cookies is done from the "Preferences", "Tools" or "Options" menu. Below are the links to the guides for managing the cookies of the main browsers:

#### Microsoft Edge

https://support.microsoft.com/it-it/microsoft-edge/eliminare-i-cookie-in-microsoft-edge-63947406-40ac-c3b8-57b9-2a946a29ae09

#### **Internet Explorer**

http://support.microsoft.com/kb/278835

#### Chrome:

http://support.google.com/chrome/bin/answer.py?hl=en-GB&answer=95647

#### Safari:

https://www.apple.com/legal/privacy/it/cookies/#:~:text=Se%20vuoi%20disabilitare%20i%20cookie.produttore%20come%20disabilitare%20i%20cookie.

# Firefox:

http://support.mozilla.org/en-US/kb/Enabling%20and%20disabling%20cookies

#### Opera:

https://help.opera.com/en/latest/web-preferences/

#### 6.4) Further information

- <u>www.garanteprivacy.it/cookie</u> (collection of the main regulatory interventions on the subject by the Italian Guarantor Authority)
- <u>www.allaboutcookies.org</u> (for more information on cookie technologies and how they work)
- <u>www.youronlinechoices.com/it/a-proposito</u> (allows users to oppose the installation of the main profiling cookies)



# 7) Contacts and request for information

The page allows the interested party to request information. The identification and contact data are requested, as well as the completion of a free text field "Request".

Purpose and legal basis of the processing (GDPR-Art.13, paragraph 1, letter c)	The identification and contact data necessary to be able to respond to contact requests from interested parties are requested. The sending of the request is subject to specific, free and informed consent (GDPR-Art.6, paragraph 1, letter a) expressed through the insertion of data by the user
<b>Communication scope</b> (GDPR-Art.13, paragraph 1, letter e,f)	The data is processed exclusively by personnel duly authorized and trained in processing (GDPR-Art.29). The data may be accessed only for site maintenance purposes by the company that provides the technological platform and its representatives. The data will not be disclosed or transferred to non-EU countries.
Data retention period (GDPR-Art.13, paragraph 2, letter a)	The data is stored for times compatible with the purpose of the collection
Contribution (GDPR-Art.13, paragraph 2, letter f)	The provision of data relating to the mandatory fields is necessary in order to obtain a response, while the optional fields are aimed at providing the staff with further useful elements to facilitate contact.

#### 8) Private Area

The page allows the user to access restricted content. The page does not require the activation of a user profile, but simple access with credentials provided by the Owner (to be kept confidential by the user). The page includes the "Forgot password" function active for authorized users.

Purpose and legal basis of the processing (GDPR-Art.13, paragraph 1, letter c)	Login credentials are required to enable the user to access restricted content. The legal basis of the processing is the fulfillment of a request from the interested party (GDPR, Art.6, c1b).
<b>Communication scope</b> (GDPR-Art.13, paragraph 1, letter e,f)	The data is processed exclusively by personnel duly authorized and trained in processing (GDPR-Art.29). The data may be accessed only for site maintenance purposes by the company that provides the technological platform and its representatives. The data will not be disclosed or transferred to non-EU countries.
Data retention period (GDPR-Art.13, paragraph 2, letter a)	The data is stored for times compatible with the purpose of the collection
Contribution (GDPR-Art.13, paragraph 2, letter f)	The provision of data is necessary to enable the access function

#### 9) Data provided voluntarily by the user

The optional, explicit and voluntary sending of messages to contact addresses, private messages sent by users to institutional profiles/pages on social media (where this possibility is provided), as well as the compilation and forwarding of any forms/modules present, involve the acquisition of the sender's contact data, necessary to respond, as well as all personal data included in the communications. The sender therefore remains personally responsible for the accuracy of the data provided, as well as their relevance and non-excess with respect to the requests in question.

#### 10) Policy update

Please note that this information may be subject to periodic review, also in relation to the relevant legislation and jurisprudence. In the event of significant changes, appropriate evidence will be given on the home page of the site for a suitable period of time. However, the interested party is invited to periodically consult this policy.