

## Information on Personal Data Processing, Pursuant to Articles 13–14 of Regulation (EU) 2016/679

### Data subjects concerned: website users.

Partitalia Srl, in its capacity as Data Controller of your personal data, pursuant to and for the purposes of EU Regulation 2016/679, hereinafter 'GDPR', hereby informs you that the above-mentioned legislation provides for the protection of the data subjects concerned with regard to the processing of personal data, and that such processing will be based on the principles of correctness, lawfulness, transparency and protection of your privacy and rights.

Your personal data will be processed in accordance with the legal provisions of the above-mentioned legislation and the confidentiality obligations therein.

Partitalia will process personal data communicated or legitimately collected ('Personal Data'). In particular, the following Personal Data may be processed:

**Identifying data:** data enabling direct identification, such as personal data (e.g. name, surname, tax code, VAT number, address, etc.);

**Contact data:** contact information, such as landline and/or mobile telephone numbers, email address, provided to the Data Controller that allows the Data Controller to contact you in order to provide you with services/offers tailored to your needs;

**Data in the reserved area:** access to the reserved area of the Partitalia website is permitted only to users who register by filling in a special registration form. When the profile is created, certain Personal Data are requested, such as first name, surname, email address and mobile phone number. This is the 'registration data' required to successfully complete the profile and gain access to one's reserved area in order to use the services offered by the company;

**Browsing data:** in the course of their operation, computer and online systems and software procedures designed to operate and use the website provided by Partitalia acquire certain data (e.g. date and time of access, pages visited, the name of the Internet service provider and the Internet Protocol (IP) address through which you access the Internet, the Internet address you use to connect to the website, etc.), whose transmission is implicit in the use of Internet communication protocols or useful for better managing and optimising the system for sending data and emails. More information on the procedures using cookies and/or other tracking technologies to collect the information you provide while browsing the website can be found in the Cookies Policy available on the website itself;

**Data acquired by Customer Service:** data provided during interactions with Partitalia Customer Service, if you have agreed to provide them.

For the purposes of this Information, 'Personal Data Processing' refers to any operation or set of operations carried out using automated processes applied to Personal Data, such as collection, recording, organisation, structuring, retention, adaptation or alteration, retrieval, consultation, use, communication by transmission, dissemination or other form of provision, comparison or connection, restriction, erasure or destruction.

Note that your Personal Data will be processed manually and/or with the support of computer or online means.

Purposes and legal basis of the processing: in particular, your data will be used for the following purposes related to completing measures connected with contractual or pre-contractual obligations:

technical and functional access to the website; no data is stored after the browser is closed;  
advanced browsing purposes or customised content management;  
statistical purposes and navigation/user analysis.

With your consent, your personal data may also be used for the following purposes:

- marketing and advertising.

You have the option to provide your data with regard to the above-mentioned purposes, and your refusal to provide such data affects neither the continuation of the relationship nor appropriate processing.

Data processing method. Your personal data may be processed in the following ways:

by means of computers running software systems managed by third parties;  
by means of computers using directly managed or programmed software systems;  
by temporary processing in anonymous form;  
data verification and modification only at the request of a party.

All processing is performed in accordance with the procedures set out in Articles 6 and 32 of the GDPR and by taking appropriate security measures.

Your data will only be processed by personnel expressly authorised by the Data Controller and, in particular, by the following categories of employees:

programmers and analysts;  
Marketing Department.

Communication: Your data may be communicated to external parties for proper management of the relationship and, in particular, to the following categories of recipients, including all duly appointed Data Processors:

Facebook: advertising service, advertising targets, content customisation;  
Google: advertising service, advertising targets, analytics/measurement, content customisation, optimisation;  
LinkedIn: advertising targets, analytics/measurement, content customisation;  
Twitter: advertising targets, analytics/measurement, content customisation;  
YouTube: advertising service, advertising targets, analytics/measurement, content customisation, optimisation.

Dissemination: Your personal data will not be disseminated in any way.

Your personal data may also be transferred, while limited to the above-mentioned purposes, to the following countries:

EU Member States;  
the United States.

Data retention period. Please note that in accordance with the principles of lawfulness, purpose limitation and data minimisation pursuant to Art. 5 of the GDPR, the period of retention for your personal data is:

established for a period of time not exceeding fulfilment of the services provided;  
established for a period of time not exceeding fulfilment of the purposes for which they are collected and processed, and in compliance with the mandatory time limits prescribed by law.

Cookies management: if you have any doubts or concerns about the use of cookies, you can take action to prevent them from being set and read — for example, by changing the privacy settings in your browser to block certain types of cookies.

Since each browser, and often different versions of the same browser, also differ considerably, if you prefer to act independently via your browser preferences, you can find detailed information on the necessary procedure in the Help section of your browser. For an overview of actions for the most common browsers, please visit [www.cookiepedia.co.uk](http://www.cookiepedia.co.uk).

Advertising companies also allow you to reject targeted advertisements if you wish. This does not prevent cookies being set, but it stops the use and collection of certain data by these companies.

For more information and waiver options, please visit [www.youronlinechoices.eu/](http://www.youronlinechoices.eu/).

Data Controller: in accordance with the Law, the Data Controller is Partitalia Srl (Via Varese 26/28, 20020 Lainate (MI); VAT no.: 04446440960; Contact information: Email: [info@partitalia.com](mailto:info@partitalia.com); Telephone: 02939305.1); Contact person: Luca Del Col.

You have the right to request the Data Controller to erase (right to be forgotten), limit, update, rectify, or transfer personal data concerning you, and to oppose their processing. You may also, in general, exercise all the rights provided for in Articles 15, 16, 17, 18, 19, 20, 21, 22 of the GDPR.

You can also view the updated version of this informative notice at any time by visiting <https://www.privacylab.it/informativa.php?10715352406>.

## **Regulation (EU) 2016/679: Articles 15, 16, 17, 18, 19, 20, 21, 22 – Rights of the data subject concerned**

1. The data subject concerned is entitled to obtain confirmation of the existence or not of their personal data, even if not yet recorded, receive their communication in an intelligible form, and lodge a complaint with the Supervisory Authority.

2. The data subject concerned has the right to be informed of:

the origin of personal data;  
the purposes and methods of processing;  
the rationale applied in the event processing is carried out using electronic instruments;  
the identification details of the Data Controller, the persons responsible and the designated representative, pursuant to Article 5, section 2;  
the subjects or categories of subjects to whom the personal data may be communicated or who may become aware of them in their capacity as designated representative(s) in the national territory, data processor(s) or person(s) in charge of processing.

3. The data subject concerned has the right to request:

that the data be updated, rectified or, when interested, integrated;  
that data processed in breach of the law be cancelled, transformed into anonymous form or blocked, including data whose storage is not necessary for the purposes for which the data were collected or subsequently processed;  
certification that the operations referred to in points a) and b), also regarding their content, were brought to the attention of those to whom the data were communicated or disseminated, except where this proves to be impossible or involves a manifestly disproportionate effort compared to the right protected;  
data portability.

4. The data subject concerned has the right to object, either in whole or in part:

to the processing of their personal data for legitimate reasons, even if relevant for the purposes of data collection;  
to the processing of personal data for the purposes of sending advertising or direct sales material, or for carrying out market research or commercial communications.