# **Privacy & Cookie**

# Privacy and Cookie Policy of the website www.dittademerio.com

### What is a Privacy and Cookie Policy?

It is the document that describes the methods of processing personal data of users who visit the website www.dittademerio.com. Therefore, this policy is also pursuant to articles 13 and 14 of Regulation (EU) 2016/679 – General Data Protection Regulation (GDPR) - for those who simply browse the website and for users who spontaneously send communications to the contact details of Demerio Carla sas di Cena Marta & C. made public on the website.

# **Reference Regulations**

- - <u>REGULATION (EU) 2016/679</u> of the European Parliament and of the Council of 27 April 2016, on the protection of individuals with regard to the processing of personal data, as well as on the free circulation of such data and repealing Directive 95/46/EC (General Data Protection Regulation);
- - <u>Provision of the Privacy Guarantor no. 229/2014</u>, relating to the Identification of the simplified procedures for the information and acquisition of consent for the use of cookies.

The policy is not valid for other websites that may be consulted through our links, regarding which Demerio Carla sas di Cena Marta & C. is in no way responsible.

### **Data Controller**

The data controller is Demerio Carla sas di Cena Marta & C., via Armando Diaz, 79-10014 Caluso (TO) tel. 0039 +011 9833122 represented by the Legal Representative. E-mail <a href="mailto:info@dittademerio.com">info@dittademerio.com</a>

### Place of data processing - Parties that can process or access it - Recipients

Processing connected to the web services offered by this website are carried out at the headquarters of the Data Controller and only handled by personnel authorized to process them. Occasionally, third-party suppliers may be allowed temporary access to the website's memories for exclusive technical assistance reasons, in compliance with the provisions of the law and under the supervision of the Controller. Data is not communicated abroad.

In addition to this, no data deriving from the interaction with the website is communicated to third parties or disseminated.

### Type of data processed

### **Browsing data**

The IT systems and software procedures for operation of this website acquire, during normal operation, some personal data the transmission of which is implicit in the use of Internet communication protocols. This is information that is not collected to be associated with identified parties concerned, but that by its very nature could, through processing and association with data held by third parties, allow identifying

users.

This category of data includes IP addresses or domain names of computers used by users that connect to the website, URI (Uniform Resource Identifier) addresses of the resources requested, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response from the server (successful, error, etc.) and other parameters regarding the operating system and the user's IT environment.

The browsing data will be collected only in the legitimate interest of allowing the user to use the contents published on the Controller's websites and their correct administration and management. This data is only used to obtain anonymous statistical information regarding use of the website and to verify its correct operation and is deleted immediately after processing. The data in question may be used to ascertain liability in the event of eventual computer crimes against our website.

### **Cookies**

The software applications used may contain the cookie technology. Cookies mainly have the function of facilitating user navigation. Cookies may provide information on browsing within the website and allow the operation of certain services that require identification of the user's browsing through different pages of the website. The cookies in the software applications used are anonymous and may not be traced back to the user's personal data. For any access to the portal regardless of the presence of a cookie, the type of browser (ex. Internet Explorer, Netscape), the operating system (ex. Macintosh, Windows), the host and the URL of origin of the visitor are recorded, in addition to data on the requested page. However, the user has the opportunity to set the browser so as to be informed when receiving a cookie and decide in this way to delete it.

### **Technical cookies**

Technical cookies are those used for the sole purpose of sending communication over an electronic communication network, or to the extent strictly necessary for the provider of an information society service explicitly requested by the subscriber or user to provide this service (see article 122, paragraph 1, of the Code). They are not used for other purposes and are normally installed directly by the controller or operator of the website.

The website uses technical cookies, with respect to which, pursuant to the <u>Provision of the Guarantor of 8 May 2014</u> no consent is required from the party concerned.

More precisely, the website uses the following technical cookies:

COOKIE NAME	TYPE	EXPIRY
cb-enabled	Technical Cookie	It is installed on the user's computer when the "Accept" button in the Cookie Bar is clicked. It is automatically deleted after 1 year
		your

### **Anonymized Monitoring Cookies (Google Analytics)**

Our pages use third-party performance cookies, in this case Google Analytics, to allow us to examine the conduct of visitors while using the website and to improve its usability and user experience.

The Guarantor <u>has clarified in the FAQ (Paragraph 2 - Use of analytical cookies of third parties)</u> that the Google Analytics cookie, if anonymized, can be considered a technical cookie and therefore not subject to preventive blocking.

In fact, on the website of the Privacy Guarantor it is specified that

"... In many cases, however, websites use, for mere statistical purposes, analytical cookies realized and made available by third parties. In these cases, it is believed that the aforementioned websites are not subject to the obligations and fulfilments required by law (notification to the Guarantor in particular) if appropriate tools are adopted to reduce the identifying power of the analytical cookies they use (for example, by masking significant portions of the IP address)...."

# Provisions adopted by Demerio Carla sas di Cena Marta & C.to anonymize the monitoring of Google Analytics

In order to anonymously monitor Google Analytics in the integration code, the following instruction has been inserted **ga** ('set', 'anonymizeIp', true); through which the last part of the IP address of the visitor is obscured.

This feature was designed by Google Analytics to help website owners comply with privacy regulations or, in some countries, the recommendations of local data protection authorities, which may prevent the storage of information about complete IP addresses.

IP masking or anonymization occurs as soon as data is received from the Analytics collection network, before any storage or processing takes place. Only in exceptional cases, the IP address will be sent to Google servers and abbreviated within the United States.

# For further information, refer to the Google page.

Google Analytics, by browsing the website www.dittademerio.com, can install the following cookies:

COOKIE NAME	OWNERSHIP	TYPE	DURATION
_ga	Google Analytics	ANONYMIZED (technical). Used to distinguish users	2 years
_gat	Google Analytics	ANONYMIZED (technical). Used to distinguish users	1 minute
_gid	Google Analytics	ANONYMIZED (technical). Used to limit	24 hours

COOKIE NAME	OWNERSHIP	TYPE the speed of request	DURATION
Channel ID	Google Analytics	ecdsa_sign certificate used to determine new sessions and visits	unlimited

# How to disable cookies from Google Analytics

Users can selectively disable Google Analytics by installing the opt-out component provided by Google on their browser.

#### Reference link:

- - Google Privacy Policy
- - Browser add-on for deactivating Google Analytics

### Total deactivation of Cookies

In addition to the above, you can still set your browser to automatically refuse the receipt of cookies by activating the appropriate option: the non-use of technical cookies, however, could cause difficulties in interacting with this website.

Lastly, we inform you that you are entitled to certain rights, including the right to oppose processing (see section on User rights).

### Data provided voluntarily by the user

The optional, explicit and voluntary sending of e-mails to addresses with the extension @dittademerio.com indicated on this site or the voluntary submission of data by completing the Contact Form on the website at <a href="http://www.dittademerio.com/contatti.html">http://www.dittademerio.com/contatti.html</a> involves by its very nature the subsequent acquisition of the sender's address, necessary to respond to requests, as well as any other personal data included in the message. The legal bases of processing are, therefore, the legitimate interest of the Controller to respond to the communications received or the need to process pre-contractual requests made by the party concerned. The data will be kept for the time necessary to fulfil any requests of the sender or issues submitted therein to the Controller and, in any case, for the time required by specific provisions of law. However, it is recalled that the sender has the right to request the cancellation of the same according to the procedures, conditions and limits provided for by article 17 of the GDPR.

We invite our users not to send in their communications names or other personal data of third parties that is not strictly necessary; on the other hand, the use of invented names is much more opportune.

# Optional data conferment

Apart from as specified for browsing data, the user shall be free to spontaneously provide personal data to request information or services. The non-conferment thereof may result in the impossibility of fulfilling the request.

# **Processing methods**

Personal data is processed electronically for the time necessary to achieve the purposes for which it was collected. Specific security measures are observed to prevent data loss, illicit or incorrect use and unauthorized access.

# Rights of parties concerned

Pursuant to articles 15 and following of the GDPR, users have the right to request at any time, access to their personal data, the correction or cancellation of the same, the limitation of processing in the cases provided for by article 18 of the Regulation, obtain, in a structured format, of common use and readable by automatic device, the data concerning them, in the cases provided for by article 20 of the GDPR. At any time, users can revoke pursuant to article 7 of the GDPR the consent given (where consent has been requested); propose a complaint to the competent control authority pursuant to article 77 of the GDPR (Guarantor for the Protection of Personal Data), if it is considered that the processing of their data is contrary to the law in force.

Users can also make a request for opposition to the processing of their personal data pursuant to article 21 of the GDPR in which to give evidence of the reasons justifying the opposition: the Data Controller reserves the right to evaluate the request, which shall not be accepted in case of binding legitimate reasons to proceed with processing that prevail over the interests, rights and freedom of users.

Requests regarding the exercise of the aforementioned rights must be addressed to:

Demerio Carla sas di Cena Marta & C. based in in via Armando Diaz, 79 – 10014 Caluso (TO) tel. 0039
011 9833122 or to the following e-mail address: *info@dittademerio.com* 

# **Updates to this Privacy and Cookie Policy**

The news provided herewith may be subject to revision following:

- - amendments to the privacy legislation, for the aspects of interest herewith;
- - technological implementations of the website that impact current processing methods;
- - organizational changes in the privacy structure of the Controller that may concern the user.

Users are kindly requested to periodically visit this Policy so as to be constantly updated on the characteristics of processing.

Last Update: 18/06/2018