

## **PRIVACY POLICY PURSUANT TO ART. 13 ITALIAN PRIVACY CODE AND ART. 13 GDPR**

Protecting the security and privacy of your personal data is important for Panzeri Carlo S.r.l., acting in compliance with the laws on the protection and security of personal data currently in force. We trust that the information below will help you to understand which kind of data Panzeri Carlo S.r.l. collect, how it uses them, how it keeps them and with whom it shares them.

Pursuant to art. 13 of Legislative Decree 196/2003 ("Privacy Code") and art. 13 of Reg. UE 679/2016 ("Privacy Regulation"), we wish to inform you that the processing of your personal data will be based on principles of correctness, lawfulness and transparency, and protecting your privacy and your rights and in compliance current legislation on the security and and personal data protection.

In particular, we inform you of the following:

### **a. Source of personal data**

The personal data in our possession are those collected at the time of your registration and/or when you submit an information request related to our products, by filling out the form at the following link: <http://www.panzeri.it/contatti/and/> or <http://www.panzeri.it/press> and/or at the time of your request for registration to our newsletter service on the site at the following link: <http://www.panzeri.com/newsletter/>.

All personal data will be processed in compliance with the Privacy Code, the Privacy Regulations and the confidentiality obligations that have always inspired the activity of our company.

### **b. Legal basis and purpose of processing**

The purposes in relation to which your data will be processed by us are the following:

#### **b1. Management of your request for information**

By processing the data you have provided, we will be able to answer to your information request related to:

- the characteristics, the nature of the products in relation to which you have expressed your interest, or to similar products, in case the products of your interest were not, momentarily or definitively available, or to any initiatives, organized by Panzeri Carlo Srl;

The legal basis for this processing is the execution of measures related to your intention to enter into a possible contract with us, based on your request.

#### **b2. Newsletters**

Based on your consent in this regard, processing the data you have provided, we may send you a periodic newsletter containing information about our business, including our products.

Even in case of consent, you can at any time withdraw the same, making a request to Panzeri Carlo S.r.l. with the methods indicated in the following point h.

You can also easily oppose further submissions also by exercising the opt-out right, through the methods included in each type of communication with which said newsletters are sent.

Once the consent has been withdrawn, you will receive confirmation of receipt of the withdrawal notice by Panzeri Carlo S.r.l.

Panzeri Carlo S.r.l., however, informs you that, also following the exercise of this right of withdrawal, it is possible that, for technical and operational reasons (for example, the formation of contact lists already completed shortly before receipt by Panzeri Carlo Srl of your notice of withdrawal), you could continue to receive some additional newsletters. Should you continue to receive newsletters from the exercise of the aforementioned right, please report the problem to Panzeri Carlo S.r.l., using the contacts indicated in the following point h.

The legal basis of the aforementioned processing is the consent to the processing of your data, you expressed when completing the contact form in the section of the web-site at the following link: <http://www.panzeri.it/newsletter/>

### **c. Method of Processing**

The data will be processed using manual or electronic tools, suitable to ensure, in relation to the purposes for which they were communicated and collected, security, as well as to prevent unauthorized access by third parties and, in any case, in compliance with the national and European legislation.

### **d. Nature of the provision of data**

The provision of data in relation to the purpose referred to in point b1) is mandatory as a necessary requirement to be able to proceed with your requests and, in case of failure to provide them, the consequences of your refusal will be those of not being able to receive information about our products, for which you have expressed interest.

The provision of data in relation to the purpose referred to in point b2) is voluntary, but is a necessary requirement to receive newsletters from Panzeri Carlo S.r.l. In case of lack of consent, the possibility to browse the site and to spontaneously address Panzeri Carlo S.r.l. requests for information, will not be affected in any way, unless it will not be possible to receive such newsletters.

We invite you not to give, during the use of interactive services, sensitive data, *i.e.* data from which it is possible to deduce, among other things, your racial or ethnic origin, religious beliefs, political opinions, party membership, unions, associations and organizations of a religious, philosophical, political or trade union nature, as well as the state of health. Any sensitive data provided will be immediately deleted.

### **e. Subjects of processing and data communication**

Your personal data may be disclosed to employees and/or independent contractors of Panzeri Carlo S.r.l. appointed to perform for Panzeri Carlo S.r.l. the same activities required to achieve the purposes of the processing referred to in paragraphs b.1) and b.2) above.

Said data may also be disclosed to IT and logistic service providers functional to the web-site's operations, outsourcing service providers, professionals and consultants and/or companies in charge of sending e-mails and promotional text messages or commercial communications (if you have consented to that).

These subjects, formally appointed by Panzeri Carlo S.r.l. as Data Processors and/or System Administrators, will process your data in compliance with and exclusively for the purposes indicated in this statement and under the control and supervision of Panzeri Carlo S.r.l.

The complete and updated list of the subjects to whom your data have been communicated can be asked to the Data Controller, you can contact by writing to the e-mail address indicated in point h).

In order to be able to handle your requests, your data may also be transferred to third-party based in your country of origin, such as agents and/or distributors of Panzeri Carlo S.r.l., which will process them as autonomous Data Controllers.

#### **f. Data diffusion**

The Data Controller will not carry out activities for the diffusion of your personal data.

#### **g. Data transfer abroad**

Your personal data will not be transferred to non-EEA countries (European Union, Iceland, Liechtenstein and Norway).

#### **h. Rights of the Data Subjects**

Finally, we inform you of the possibility of exercising the rights recognized by the law at any time, which are the following:

- access the data provided;
- obtain the correction of the data provided, their cancellation, transformation into anonymous form, the blocking of data processed in violation of the law or the limitation of the processing of data concerning you;
- oppose data processing;
- withdraw your consent;
- obtain the portability of your data;
- obtain confirmation of the existence or otherwise of the same data, know its content and origin, verify its accuracy or request its integration or updating, know the purposes and methods of processing, the logic applied in case of treatment carried out with the aid of electronic tools, the identification details of the holder, of the persons in charge, of the persons in charge and of the DPO, if any;
- propose a complaint to the supervisory authority (Data Protection Authority);
- oppose an automated decision-making process concerning individuals, including profiling;
- obtain, without undue delay, the communication of a data breach of your personal data.

Requests should be addressed:

- by e-mail, at the address: [panzeri@panzeri.it](mailto:panzeri@panzeri.it)
- by fax: +39 (039) 2497396
- or by mail, at the following address: Via Padania 8, 20853 Biassono (MB)

#### **i. Data retention period**

The data you have given in relation to the aforementioned purpose b.1) will be kept for the time necessary to process your information request and, thereafter, for the time necessary for the execution of the contract, where it is concluded, as a result of your request for information. Only in the event that you, by making a request for information to our company, have also given your consent in relation to the aforementioned purpose b.2), your data will be kept for a period of two years.

In any case of withdrawal of your consent and / or in the event that, for any reason, the retention of your personal data is not further justified on the basis of evaluations carried out that take into account the principles of necessity, proportionality, adequacy and pertinence of the processing, the Data Controller will arrange without delay the cancellation or anonymization of your data.

#### **l. Data Controller**

The Data Controller is Panzeri Carlo S.r.l., in person of its legal representative, with operational headquarters in Biassono (MB), Via Padania 8 - 20853 Biassono (MB), e-mail [panzeri@panzeri.it](mailto:panzeri@panzeri.it).

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#### **Cookie Policy**

This web-site uses cookies.

With this document, pursuant to articles 13 and 122 of the Privacy Code, as well as according to the provisions of the General Provision of the Italian Data Protection Authority of May 8th 2014 and the Privacy Regulation (Article 95, in particular) Panzeri Carlo Srl, as Data Controller, provides the following information relating to the cookies used on the web-site

In particular, the web-site uses the following cookies:

Cookie	Cathegory	Description	Duration
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<p><b>icl_current_language -</b>  <b>_wp__utma -</b>  <b>_utmb -</b>  <b>Utmc -</b>  <b>utmt -</b>  <b>_utmz</b>  <b>_wp_session</b>  <b>_euCookie</b></p>	<p>Technical Cookies</p>	<p>These are used for the sole purpose of "transmitting a communication over an electronic communications network, or as strictly necessary for the provider of an information society service explicitly requested by the subscriber or user to provide such service" . They are used to navigate or provide a service requested by the user. They are not used for other purposes and are normally installed directly by the owner of the Website. Without the use of these cookies, some operations could not be performed or would be more complex and/or less safe. They can be divided into: (i) navigation or session cookies, which guarantee the normal navigation and use of the website (allowing, for example, to make a purchase or authenticate to access restricted areas); they are in fact necessary for the proper functioning of the site; (ii) analytics cookies, similar to technical cookies when used directly by the site operator to collect information, in aggregate form, on the number of users and how they visit the site, in order to improve site performance; (iii) functionality cookies, which allow the user to navigate according to a series of selected criteria (for example, the language, the products selected for purchase) in order to improve the service provided.</p>	<p>Expiring date: 365 days</p>
<p><b>_cfduid</b>  <b>PHPSESSID</b></p>	<p>Third parties technical cookies</p>	<p>The web-site may allow the use of third-party cookies that may collect information about the user's movements on the Internet to identify trusted web traffic. Cookies do not store any personal information.</p>	<p>Expiring date: 365 days  Expiring date: 30days</p>
<p><b>CONSENT NID</b></p>	<p>Google Analytics</p>	<p>Google Analytics uses "cookies", which are text files placed on your computer to allow the web-site to analyze how users use the site.  The information generated by the cookie about your use of the web-site (including your anonymous IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of examining your use of the web--site, compiling reports on website activity for web-site operators and providing other services relating to web-site activity and internet usage.  Google may also transfer this information to third parties where required to do so by law or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google.</p>	<p>Expiring date: 20 years Expiring date: 6 months</p>

		<p>You may refuse to use cookies by selecting the appropriate settings on your browser, but please note that if you do this you may not be able to use all the features of this website. By using this website, you consent to the processing of your data by Google in the manner and for the purposes set out above.</p> <p>You can prevent Google from detecting a cookie that is generated due to and related to your use of this website (including your IP address) and the processing of such data by downloading and installing this browser plugin: <a href="http://tools.google">http://tools.google</a>.</p>	
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### What are cookies

A "cookie" is a small text file created on the user's computer when he accesses a particular web-site, with the purpose of storing and transporting information. Cookies are sent by a web server (which is the computer on which the visited web-site is running) to the user's browser (Internet Explorer, Mozilla Firefox, Google Chrome, Opera, etc.) and stored on the computer of this last; they are then sent back to the web-site at the time of subsequent visits.

During navigation, the user may receive on his terminal cookies from different sites (so-called "third-party" cookies), directly set up by the operators of said web-sites and used for the purposes and according to the procedures defined by them.

### Types of cookies used by this web-site

As per the list provided in the table above, this web-site only uses technical and analytical Google cookies with respect to which, pursuant to art. 122 of the Privacy Code and the Provision of the Italian Data Protection Authority of May 8th 2014, as well as of the Privacy Regulation (Article 95, in particular), no consent by the interested party is required.

You can find more information about the cookies shown in the table that precedes the following links:

[https://cookiepedia.co.uk/cookies/\\_icl\\_current\\_language](https://cookiepedia.co.uk/cookies/_icl_current_language)

[https://cookiepedia.co.uk/cookies/\\_wp\\_session](https://cookiepedia.co.uk/cookies/_wp_session)

<https://cookiepedia.co.uk/cookies/euCookie>

[https://cookiepedia.co.uk/cookies/\\_utma](https://cookiepedia.co.uk/cookies/_utma)

[https://cookiepedia.co.uk/cookies/\\_utmb](https://cookiepedia.co.uk/cookies/_utmb)

[https://cookiepedia.co.uk/cookies/\\_utmc](https://cookiepedia.co.uk/cookies/_utmc)

[https://cookiepedia.co.uk/cookies/\\_utmt](https://cookiepedia.co.uk/cookies/_utmt)

[https://cookiepedia.co.uk/cookies/\\_utmz](https://cookiepedia.co.uk/cookies/_utmz)

[https://cookiepedia.co.uk/cookies/\\_cfduid](https://cookiepedia.co.uk/cookies/_cfduid)

<https://cookiepedia.co.uk/cookies/PHPSESSID>

<https://cookiepedia.co.uk/cookies/CONSENT>

<https://cookiepedia.co.uk/cookies/NID>

### Method of processing

The processing is carried out with automated tools suitable to guarantee, in relation to the purposes for which they were collected, security, as well as to prevent unauthorized access by third parties and, in any case, in compliance with the provisions of national and European legislation. The treatment is carried out by the Data Controller, by the External Managers and by the Delegates for the purpose assigned to the processing. No dissemination is carried out.

### Provision of data

Except for technical cookies strictly necessary for normal browsing, as well as for analytical Google cookies in relation to which you can find more information at [https://support.google.com/analytics/topic/2919631?hl=it&ref\\_topic=1008008](https://support.google.com/analytics/topic/2919631?hl=it&ref_topic=1008008) the conferment of data is left to the will of the Data Subject who decides to browse the web-site after having read the brief information contained in the appropriate banner and to use the services of third parties that involve the installation of cookies.

The Data Subject can therefore avoid the installation of cookies by keeping the banner (refraining from closing it by clicking on the "Accept and Close" button), as well as through the appropriate functions available on your browser.

### Disabling cookies

In addition to what is indicated in this document, you can manage your cookie preferences directly in your browser and prevent - for example - that third parties can install. Through the preferences of the browser it is also possible to delete the cookies installed in the past, including the cookie in which the consent to the installation of cookies by this site is eventually saved. It is important to note that disabling all cookies, the operation of this site may be compromised.

### Data transfer abroad

This site may share some of the data collected with services located outside the EEA area. In particular with Google, through the Google Analytics service. The transfer is authorized on the basis of specific decisions of the European Union and the Data protection

Authority, in particular Decision 1250/2016 (Privacy Shield - here the information page of the Italian Data Protection Authority), for which no further consent is required. Google guarantees its adherence to the Privacy Shield as per link: [https://support.google.com/analytics/answer/7105316?hl=it&ref\\_topic=2919631](https://support.google.com/analytics/answer/7105316?hl=it&ref_topic=2919631).

### **Settings Management**

Each browser has different procedures for managing settings. You can get specific instructions through the links below.

Internet Explorer: <http://windows.microsoft.com/it-it/windows7/block-enable-or-allow-cookies>

Google Chrome: [https://support.google.com/chrome/answer/95647?hl=en-GB&p=cpn\\_cookies](https://support.google.com/chrome/answer/95647?hl=en-GB&p=cpn_cookies)

Mozilla Firefox: <https://support.mozilla.org/it/kb/Attivare%20e%20disattivare%20i%20cookie>

Apple Safari: <https://www.apple.com/legal/privacy/it/cookies/>

To get information on the cookies stored on your terminal and disable them individually, refer to the link:

<http://www.youronlinechoices.com/it/le-tue-scelte>