Guideline on the processing of personal data pursuant to art. 13-14 EU Reg. 2016/679

The Parties involved: Internet site browsers.

Robino & Galandrino S.p.A., in the person of its Legal representative pro tempore, as Data Controller of personal data processing, pursuant to and in accordance with the EU Reg. 2016/679 hereafter 'GDPR', hereby informs you that the aforementioned regulation includes the protection of data of the parties involved regarding the processing of personal data and that this processing will be based on principles of correctness, lawfulness, transparency and protection of Your privacy and Your rights.

Your personal data will be processed in accordance with the legislative provisions of the aforementioned regulation and the confidentiality obligations therein.

Purposes of processing: your data will be particularly processed for the following purposes related to the fulfillment of legislative or contractual obligations:

- technical and functional access to the site no data will be kept after the closing the of Browser;

- Advanced navigation purposes or customized content management;
- Statistics and analysis purposes of navigation and users.

The processing of functional data for the fulfillment of these obligations is necessary for a proper management of the relationship and their conferment is mandatory to implement the purposes indicated above. The Data Controller also states that any non-communication, or incorrect communication, of one of the mandatory information, could prevent the Data Controller from guaranteeing the adequacy of the processing.

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

- Marketing and Advertising purposes.

Data supply regarding the aforementioned purposes is optional for you and your refusal to data processing does not enable the onward of the relationship or the adequacy of the processing.

Method of processing data. Your personal data may be processed in the following ways:

- by electronic calculators using third party software systems;
- by electronic calculators using software systems managed or programmed directly;
- "blind" temporary processing.

Each data processing takes place in accordance with the articles. 6, 32 of the GDPR and through the proper security measures.

Communication: your data will be communicated exclusively to duly appointed persons for the fulfillment of the necessary services aiming to manage the relationship, with guaranteed protection of the rights of the interested parties.

Your data will be processed only by personnel expressly authorized by the Data Controller and, particularly, by the following categories of employees:

-marketing office;

- programmers and analysts.

Your data may be communicated to third parties duly appointed as Responsible for Data Processing, particularly to:

DoubleClick: Advertising Service, Advertising Coverage, Analytics / Measurement, Content Customization, Optimization;

Google: Advertising Service, Advertising Coverage, Analytics / Measurement, Content Customization, Optimization;

Google Analytics: Advertising Coverage, Analytics / Measurement, Optimization.

Circulation: Your personal data will not be disclosed in any way.

Your personal data may also be transferred, in accordance with the purposes indicated above and with the guarantees requested from time to time, in the following states:

- EU countries
- United States.

Storage term. Please note that, in accordance with the principles of lawfulness, purpose limitation and data minimization, pursuant to art. 5 of the GDPR, the storage term of your personal data is:

- established for a period of time not exceeding the achievement of the purposes for which they are collected and processed for the execution and fulfillment of the contractual purposes;

- established for a period of time not exceeding the fulfillment of the services provided;

- established for a period of time not exceeding the achievement of the purposes for which they are collected and processed and in accordance with the mandatory time provided by the law.

Cookie management: in case of doubts related to the use of cookies you could interfere and prevent the setting and reading, for instance modifying the privacy settings in your browser and block certain types of cookies

As each browser - and different versions of the same browser – often slightly differ one of another, you could adjust independently the setting through the preferences of your browser, you can find detailed information about the procedure, in the guide of your browser. For an overview of the most common browsing modes, visit the website address: www.cookiepedia.co.uk.

Advertising companies also allow waiving the reception of targeted ads, if wished. This does not prevent the setting of cookies, but stops the use and collection of some data by these companies.

For more information and cancellation options, contact sales@robinoegalandrino.it

Data Controller: the Data Controller, pursuant to the Law, is Robino & Galandrino S.p.A. - based in Alessandria (AL), Corso Virginia Marini 103, - tel. 0141821411 - fax 0141832539 - mail <u>sales@robinoegalandrino.it</u> VAT No. 01878780061 - in the person of the CEO pro tempore.

You have the right to obtain from the Data Controller the cancellation (right to be forgotten), limitation, updating, correction, portability, opposition to the processing of personal data concerning You, as well as the possibility to exercise all the rights provided in articles 15, 16, 17, 18, 19, 20, 21, 22 of the GDPR.

EU Reg. 2016/679: Articles 15, 16, 17, 18, 19, 20, 21, 22 - Rights of the interested party

- 1. The interested party has the right to obtain confirmation of the existence or not of personal data concerning him / her, even if not recorded yet, and their communication in comprehensible form.
- 2. The interested party has the right to be supplied with:

the origin of personal data;

the purposes and methods of processing data;

the method applied in case of processing data with the aid of electronic instruments;

the identifying details of the Data Controller, of the manager and of the designated representative in accordance with article 5, paragraph 2;

the parties or licensee to whom personal data may be communicated or that can gain knowledge as appointed representative of the Country, managers or assistants.

• 3. The interested party has the right to be supplied with:

updating, correction or, when needed, addition to the data;

cancellation," blind" conversion or data block processed in breaching of law, including data whose storage is not necessary for the purposes the data were collected for or subsequently processed;

certification that the operations as per in letters a) and b) have been brought to the attention of, also regarding their content, of those to whom the data have been communicated or circulated, except in case this fulfillment is impossible or involves a use of means manifestly disproportioned to the protected right;

data portability.

• 4. The interested party has the right to resist, wholly or in part:

To the processing of personal data, by legitimate reasons, concerning him, even if relevant to the purpose of the data collection;

To the processing of personal data related to him for the purpose of sending advertising or direct sale material or for market researches or commercial communication.

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