

PRIVACY POLICY

This communication is made available to you – also pursuant to the article 13 of the European Regulation on the protection of personal data (“GDPR”) 679/2016, to the Italian Legislative Decree 30/06/2003 n. 196 (“Privacy Code”) and subsequent amendments and addition, – by Giannoni Group srl with legal address in Via VIII Marzo, 14, 50053 Terrafino as Data Controller of your personal data.

The purpose of this information notice is to inform the user about the methods of processing personal data.

Type of data processed

The website offers informative and, sometimes, interactive content. During the navigation on the site c will be able, therefore, to acquire information on the visitor, in the following ways:

Navigation data

The computer systems and software procedures, preceded to the operation of this website, acquire, during their normal operation, some personal data whose transmission is implicit in the use of the internet communication protocols. This category of data includes: the IP address, the type of browser used, the operating system, the name of domain and the addresses from which the access has been affected, information on pages visited by users inside the site, the access time, the permanence on the single page, the internal path analysis and other parameters relating to the operating system and to the computer environment of the customer.

Further categories of data

This is all personal data provided by the visitor through the site, for example, by registering and/or accessing to a reserved area and/or a service and/or participating in one of the commercial initiatives of Giannoni Group srl by writing to an e-mail address amministrazione@reposa.it to request information, or by calling our toll-free number to have a direct contact with the service clients.

Or

It deals with all that personal data furnished by the visitor through the site, for example:

- filling out a form through which to ask for a preventive e/o information on the offered services e/o an application of contact;
- writing to the mail addresses pointed out in our site to ask for information;
- entering to a reserved area e/o to a service;
- filling out a form to submit your own curriculum vitae;
- filling out a form to receive our newsletter and communications of marketing;
- filling out a form to enroll in one of the initiatives of Giannoni Group srl (conferences, seminars, workshop, events).

Purpose of the treatment

The data provided are processed for the following purposes:

- to provide the good and/or service required by the user, to manage the contracts improved by the user, to carry out administrative procedures, accounting, tax and legal fulfillments, as well as to escape the requests submitted by the user. The processing, set in to be for these purposes, are necessary for the fulfillment of contractual obligations and they do not require specific consent from the Data subject.
- to recognize the experience of use of our platforms, of the products and services that we offer and to ensure the proper functioning of the web pages and their contents. The processing, set in to be for these purposes, are based on a legitimate interest of the Data Controller;
- to send commercial communications related to promotions and/or offers, in the interest of the Data Controller; the processing, set in to be for these purposes, are carried out with the specific consent provided by the user.

Share and transfer of personal data

The data collected by Giannoni Group srl will be shared only for the purposes mentioned above; we will not share or transfer your personal data to third parties other than those indicated in this Privacy Policy.

During our activities and exclusively for the same purposes of those listed in this Privacy Policy, your personal data may be transferred to the following categories of recipients:

- Company staff;
- Service provider (etc. IT system providers, cloud service providers, database vendors and consultants)
- Public Administration for law purposes;
- Every public and/or private subject to whom it is necessary to communicate your personal data in relation to the purposes indicated above.

The updated list of Processors is available at controller's legal address and it will be provided with a prior written application.

Giannoni Group srl could have to transfer your personal data to countries situated outside the European Union/European Economic Area (EEA), so called "third-country". These transfers to third countries can include all the activities indicated above.

This Privacy policy is also applicable in the case of transfer of data in which the level of protection of the data is different in comparison of that of the European Union. Every transfer of personal data to third will be affected only after having you informed and, where in demand, after having received your consent. Every transfer of data toward different countries from those for which the European Commission has taken an adequacy decision is based on agreements that use standard contractual clauses adopted by the European Commission or other appropriate guarantees in the compliance with applicable laws.

Protection of personal data

Giannoni Group srl have implemented appropriate technical and organizational measures to provide an appropriate level of security and privacy to personal data.

These measures concerning:

- The state of technology;

- The implementation costs;
- The nature of the data;
- The risk of treatment.

The aim is to protect them from accidental or unlawful destruction, accidental loss, unauthorized disclosure/access and other form of illegal processing.

Also, when Giannoni Group srl manages your data:

- Collects and processes data that are adequate, relevant and not excessive, as required to meet the purposes specified above;
- Ensures that the data are accurate and updated.

Storage periods

Giannoni Group srl will maintain your personal data for the time strictly necessary to achieve the purposes for which they were processed or, alternatively, for the time required by applicable law or regulatory requirements, except your right to object to data processing or the right to be forgotten.

When this period will expire, your personal data will be removed from active system of Giannoni Group srl.

Your right

Your rights are:

- **RIGHT TO RECTIFICATION.** You have the right to obtain from Giannoni Group srl the rectification of personal data concerning you. Giannoni Group srl shall make reasonable efforts to ensure that the personal data it holds are accurate, complete current and relevant.
- **RIGHT TO RESTRICTION TO THE PROCESSING.** You can obtain a restriction to the processing your personal data, where:
 - the accuracy of the personal data is contested by the data subject, during the period when Giannoni Group srl must verify the accuracy of the personal data;
 - the processing is unlawful and you require the erasure of personal data or the restriction of their use instead;
 - Giannoni Group srl no longer needs the personal data for the purposes of the processing, but they are required by you to establishment, exercise or defend of legal claims;
 - you have objected to the processing, while Giannoni Group srl checks whether your legitimate reasons prevail over your own.
- **RIGHT TO ACCESS.** You have the right to obtain from Giannoni Group srl information about your personal data, and also information on which categories of personal data Giannoni Group srl owns or controls, for what purpose they are used, where they have been collected and to whom they may have been communicated.

- **RIGHT TO DATA PORTABILITY.** As a result of your application, Giannoni Group srl will transmit the data to another Controller on condition that the processing is based on your consent or is necessary for the execution of a contract.
- **RIGHT TO ERASURE.** Unless the processing of data is necessary for compliance with a legal obligation or to establishment, exercise or defend of legal claims, you have the right to obtain from Giannoni Group srl the erasure of personal data if:
 - the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
 - you objected to the processing of your personal data;
 - the personal data have been unlawfully processed.
- **RIGHT TO OBJECT.** You object at any time to the processing of your personal data, on the condition that the data processing is not based on your consent but on the legitimate interest of Giannoni Group srl or third party. Giannoni Group srl shall no longer process the personal data, unless the Controller demonstrates mandatory and legitimate reasons for the processing, an overriding interest in treatment, or the exercise or defend of legal claims. When you object to processing, specify if you're going to erasure your personal data or limiting the processing.
- **RIGHT TO LODGE A COMPLAINT.** You have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place where the alleged infringement took place.

Amendments to this Privacy Policy

Any future changes or additions to the processing of personal data as described in this privacy notice will be notified in advance through an individual notification, through the usual communication channels used by Giannoni Group srl (etc. e-mail or through the internet).

Data Controller and point of contact

To exercise their rights under articles 15 ss. of GDPR, you can contact the Data Controller Giannoni Group srl, with legal address in Via VIII Marzo, 14, 50053 Terrafino.

Phone + 39(0)571-83425, Email amministrazione@reposa.it

The point of contact is Elena Pagliai and he can be reached at the email address amministrazione@reposa.it

