

Privacy and cookie policy

PRIVACY POLICY



In compliance with the obligations deriving from national legislation (Legislative Decree 30 June 2003 no. 196, Code for the protection of personal data) and EU legislation, (European Regulation for the protection of personal data no. 679/2016, GDPR) and subsequent amendments, this website respects and protects the privacy of visitors and users, putting in place every effort possible and proportionate to not infringe the rights of users.



This privacy policy applies only to the online activities of this website and is valid for visitors/users of the website. It does not apply to information collected through channels other than this website. The purpose of the privacy policy is to provide maximum transparency regarding the information that the website collects and how it is used.

Legal basis of processing



This website processes data based on consent. With the use or consultation of this website, visitors and users explicitly approve this privacy policy and consent to the processing of their personal data in relation to the methods and purposes described below, including any disclosure to third parties if necessary for the provision of a service. The provision of data and therefore the consent to the collection and processing of data is optional, the User may refuse consent, and may revoke consent already provided at any time (through the [Contacts link](#) at the bottom of the page). However, denying consent may make it impossible to provide certain services and the browsing experience on the website may be compromised. Starting from 25 May 2018 (date of entry into force of the GDPR), this website will process some of the data based on the legitimate interests of the data controller.

Data collected and purposes



Like all websites, this website also makes use of log files in which **information collected in an automated manner** during user visits is stored. The information collected could be the following:

- internet protocol (IP) address;
- type of browser and device parameters used to connect to the website;
- name of the Internet service provider (ISP);

- date and time of visit;
- web page of origin of the visitor (referral) and exit page;
- possibly the number of clicks.

Your personal data may also be processed for the following additional purposes functional to the activity of the Controller:

- Market research, economic analysis and statistics;
- Commercialization of the services of the Controller, sending of advertising/informative/promotional material and participation in initiatives aimed at customers and contacts of the Controller;
- Surveys of the degree of customer satisfaction on the quality of services provided.

The processing of data is optional and may be revoked by clicking on the link at the bottom of the page.



The above information is processed in an automated manner and collected in an exclusively aggregated form in order to verify the correct functioning of the website, and for security reasons (from 25 May 2018 such information will be processed according to the legitimate interests of the controller).

For security purposes (spam filters, firewalls, virus detection), the data automatically recorded may possibly also include personal data such as IP address, which could be used, in accordance with applicable laws, in order to block attempts at damage to the website or to cause damage to other users, or in any case harmful activities or constituting a crime. Such data is never used for the identification or profiling of the user, but only for the purposes of protection of the website and its users (from 25 May 2018 such information will be processed according to the legitimate interests of the controller).



The data received will be used exclusively for the provision of the service requested and only for the time needed to provide the service.

The information that users of the website deem to make public through the services and tools made available to them, are provided by the user knowingly and voluntarily, exempting this website from any liability regarding any violation of laws. It is the responsibility of users to verify that they have permission to enter personal data of third parties or contents protected by national and international standards.



The data collected by the website during its operation is used exclusively for the purposes indicated above and kept for the time strictly necessary to carry out the activities specified. In any case, the data collected from the website will never be provided to third parties, for any reason, unless it is a legitimate request by the judicial authority and only in the cases provided by law.

The data used for security purposes (block attempts to damage the website) are kept for 7 days.

Place of processing

The data collected by the website are processed at the headquarters of the Data Controller, and at the Web Hosting data center. Web hosting (RGWeb - Via Caldera 21, Milan, MI), which is the data processing manager, processing data on behalf of the controller, is located in the European Economic Area and acts in accordance with European standards.

Cookies

As is customary on all websites, this website also uses cookies, small text files that allow storing information on visitor preferences, to improve the functionality of the website, to simplify browsing by automating procedures (ex. Login, website language) and for the analysis of the use of the website.

Session cookies are essential in order to distinguish among connected users, and are useful to avoid that a functionality requested can be provided to the wrong user, as well as for security purposes to prevent cyber attacks on the website. Session cookies do not contain personal data and last only for the current session, i.e. until the browser is closed. No consent is required for them. The **functionality cookies** used by the website are strictly necessary for the use of the website; in particular, they are linked to an express request for functionality by the user (such as Login), for which no consent is required.



By using the website, the visitor expressly consents to the use of cookies.

Disabling cookies



Cookies are connected to the browser used and **CAN BE DISABLED DIRECTLY FROM THE BROWSER**, thus refusing/revoking consent to the use of cookies. It is noted that disabling cookies may prevent the correct use of some features of the website. Instructions for disabling cookies can be found on the following web pages:

[Mozilla Firefox](#) - [Microsoft Internet Explorer](#) - [Microsoft Edge](#) - [Google Chrome](#) - [Opera](#) - [Apple Safari](#)

Third-party cookies

This website also acts as an **intermediary for third-party cookies**, used to provide additional services and features to visitors and to improve the use of the website, such as buttons for social media, or video. This website has no control over third-party cookies, entirely managed by third parties. As a consequence, the information on the use of these cookies and their purposes, as well as on how to disable them, is provided directly by the third parties on the pages indicated below.

In particular, this website uses cookies of the following third parties:

- **Google Analytics**: a Google analysis tool that through the use of cookies (performance cookies), collects anonymous browsing data (IP truncated to the last octet) and exclusively aggregates for the purpose of examining the use of the website by users, compiling reports on activities on the website and providing other information, including the number of visitors and pages visited. Google may also transfer said information to third parties where required to do so by law or where such third parties process the information on behalf of Google. Google will not associate the IP address with any other data held by Google. Data transmitted to Google is stored on Google servers in the United

States.

On the basis of a specific agreement with Google, which is designated as the data controller, the latter undertakes to process data according to the requests of the Data Controller (see at the end of the information), given through the software settings. Based on these settings, the advertising and data sharing options are disabled.

Further information on cookies of Google Analytics can be found at [Google Analytics Cookie Usage on Websites](#).



The user can selectively disable the collection of data by Google Analytics by installing on the browser the [specific component provided by Google](#) (opt out).

- **Youtube:** a platform owned by Google, for sharing videos, which uses cookies to collect information from users and browsing devices. The videos on the website do not convey cookies when the page is accessed, since the [advanced privacy \(no cookie\)](#) option has been set, according to which YouTube does not store visitor information unless they voluntarily reproduce the video.

cookies: test_cookie.doubleclick.net is not a permanent cookie, but is used to check if the user's browser supports cookies.

For further information on the use of data and processing by Google, it is recommended to view the information on the specific [page provided by Google](#), and on the page on [How to use the data by Google when using sites or apps of partners](#).

Social Network Plugins

This website also incorporates plugins and/or buttons for social networks, in order to allow easy sharing of content on your favourite social networks. These plugins are programmed so as not to set any cookies when accessing the page, to safeguard the privacy of users. Possibly cookies are set, if so provided by social networks, only when the user makes effective and voluntary use of the plugin. Please note that if the user browses, being logged into the social network, then consent has already been provided to the use of cookies conveyed through this website at the time of registration to the social network.

The collection and use of the information obtained by means of the plugin are governed by the respective privacy policies of the social networks, to which reference is made.

- [Facebook](#) - ([cookie policy link](#))

- [Twitter](#) - ([cookie policy link](#))

- [LinkedIn](#) - ([cookie policy link](#))

- [Google+](#) - ([cookie policy link](#)).

Transfer of data to non-EU countries



This website may share some of the data collected with services located outside the European Union area. In particular, with Google, Facebook and Microsoft (LinkedIn) through social plugins and the Google Analytics service. The transfer is authorized on the basis of specific [decisions of the European Union and the Guarantor for the protection of personal data](#), in particular Decision 1250/2016 ([Privacy Shield](#) - here is the [information page of the Italian Guarantor](#)), for which no further consent is required. The companies mentioned above guarantee their adherence to the Privacy Shield.

Security measures

This website processes the data of users in a lawful and correct manner, adopting the appropriate security measures to prevent unauthorized access, disclosure, modification or unauthorized destruction of data. Processing shall be by means of computer and/or telematic tools, with organizational methods and logic strictly related to the purposes indicated. In addition to the Controller, in some cases, the Data may be accessed by categories of personnel involved in the organization of the website (administrative, commercial, marketing and legal personnel, system administrators) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies).

Users' Rights

Pursuant to European Regulation 679/2016 (GDPR) and national legislation, Users may, in accordance with the procedures and within the limits established by current legislation, exercise the following rights:

- request confirmation of the existence of personal data concerning them (right of access); - know the origin; - receive intelligible communication; - have information about the logic, methods and purposes of processing; - request the updating, correction, integration, cancellation, transformation into anonymous form, blocking of data processed in violation of the law, including data no longer necessary for the pursuit of the purposes for which they were collected; - in cases of consent-based processing, receive for only the cost of any support, their data provided to the controller, in a structured and readable form by a data processor and in a format commonly used by an electronic device; - the right to file a complaint with the Supervisory Authority (Privacy Guarantor - [link to the Guarantor page](#)); - and, more generally, exercise all the rights that are recognized by the current provisions of the law.

Requests shall be submitted to the Data Controller.

If the data is processed on the basis of **legitimate interests**, the rights of parties concerned are however guaranteed (with the exception of the right to portability that is not provided for by the regulations), in particular the right to oppose processing that can be exercised by sending a request to the data controller.

Data Controller

The Data Controller pursuant to applicable laws is Bettinelli F.lli S.p.A., which can be contacted via PEC (certified e-mail): privacyinman@legalmail.it

Data Processing Manager

Web hosting (RGWeb - Via Caldera 21, Milan, IT), is appointed data processing manager, processing data on behalf of the controller. VHosting is located in the European Economic Area and acts in accordance with European standards ([VHosting privacy policy](#)).

Google is appointed data controller, processing data on behalf of the controller (Google Analytics).

Updates

This policy is updated at 25 May 2018.