

PRIVACY & COOKIES POLICY

Information for data processing

We provide you with the necessary information regarding the processing of your personal data, also pursuant to art.13 of the European Regulation 2016/679. The information is not valid for other websites that may be consulted through links on the websites in the domain of the owner, that is not to be considered in any way responsible for the websites of third parties.

The information is also inspired by the Recommendation n. 2/2001 that the European authorities for the protection of personal data, gathered in the Group established by art. 29 of Directive No 95/46/EC, adopted on 17 May 2001 to identify certain minimum requirements for the collection of personal data on-line. In particular, the methods, timing and nature of the information that the data controllers must provide to users when they connect to web pages, regardless of the purpose of the link, as well as the provisions of Directive 2002/58/EC, as updated by Directive 2009/136/EC on Cookies.

THE "DATA CONTROLLER" pursuant to Article 28 of the European Regulation 2016/679 is Enterprise **Srl** - Via Penella 21, 25079 Vobarno (BS), Tel 0365 599293 info@nebu.it in the person of the pro tempore legal representative Mr. Luca Almici.

Types of data processed

Personal and identification data.

Personal data means any information relating to a natural person, identified or identifiable, including indirectly, by reference to any other information, including a personal identification number; Identification data, personal data that allow the direct identification of the interested party (such as name, surname, e-mail address, address, telephone number, etc...) pursuant to art.4 of the European Regulation 2016/679.

Navigation data

The computer systems and *software procedures used to operate this website* acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols. This information is not collected to be associated with identified interested parties, but by their very nature could, through processing and association with data held by third parties, allow users to be identified. This category of data includes IP addresses or *domain names of computers used* by users who connect to the site, URI (Uniform Resource Identifier) addresses of the requested resources, 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 given by the server (successful, error, etc.) and other parameters related to the user's operating system and computer environment. These data are used only to obtain anonymous statistical information on the use of the site and to check its correct functioning.

Defence in Court - The User's Personal Data may be used for defence by the Owner in Court or in the stages leading to its possible establishment, against abuse in the use of the same or related services by the User. The data could be used to ascertain responsibility in case of hypothetical computer crimes against the site.

Maintenance - The User's Personal Data may be processed with additional methods and purposes related to the maintenance of the systems.

Data provided voluntarily by the user

The optional, explicit and voluntary sending of e-mail to the addresses indicated on this site or the compilation of data collection forms, involves the subsequent acquisition of the sender's address, necessary to respond to requests, and any other personal data entered. Specific information - Specific information may be presented on the pages of the Site in relation to particular services or processing of the Data provided by the User or the Data Subject.

Cookies

Below is the Cookies Policy

The software applications used may contain the "cookie" technology. Cookies mainly have the function of facilitating navigation by the user. Cookies may provide information on navigation within the Site and allow the operation of certain services that require the identification of the user's path through different pages of the Site. For any access to the portal regardless of the presence of a cookie, are recorded the browser type the operating system (e.g. Microsoft, Apple, Android, Linux, etc...), the host and the URL of origin of the visitor, in addition to the data on the page requested. However, the user can set his browser to be informed when you receive a cookie and decide in this way to delete it. More information about cookies can be found on the websites of the browser providers.

What are the cookies?

Cookies are small text strings stored in the user's computer, when visiting certain pages on the internet. In most browsers cookies are enabled, at the bottom of the information necessary to change the settings of cookies on the browser. Cookies are not harmful to the device. In the cookies we generate, we do not store personal identification information, but we use information to improve your stay on the site. For example, they are useful for identifying and resolving errors. More information about cookies available on the sites: www.allaboutcookies.org and www.youronlinechoices.eu. Cookies can perform different functions, such as navigating between

the various pages efficiently and in general can improve the user's permanence. The owner reserves the right to use cookies, with the consent of the user where the applicable law or regulations so determine, to facilitate navigation on this site and customize the information that will appear. The owner also reserves the right to use similar systems to collect information about users of the site, such as the type of internet browser and operating system used, for statistical or security purposes.

Types of cookies

The cookies are then distinguished in "session" and "persistent", the first once downloaded are then deleted when the browser is closed, the second instead are stored until their expiry or deletion. The session cookies used are intended to speed up the analysis of Internet traffic and facilitate users access to the services offered by the site. Session cookies are mainly used during authentication, authorization and navigation in the services that are accessed through a registration. Most browsers are set to accept cookies. If you do not want to accept cookies, you can set your computer to reject them or display a warning when they are stored.

If the data subject refuses the use of cookies, some features of the site may not work properly and some of the services are not available. The use of c.d. session cookies is strictly limited to the transmission of session identifiers, necessary to allow safe and efficient exploration of the site. Such data are of a technical nature, temporary validity and are not collected for the purpose of identifying users but, due to their operation and in combination with other data held by third parties (such as the Internet connection provider of the data subject) They might allow identification. First-party cookies are readable only to the domain that created them.

Third-party cookies:

created and readable from domains external to this site. The software used creates a cookie in order to generate usage statistics. The data generated by this cookie are stored at Google Inc. For the operation of cookies in Google Analytics see the official documentation provided by Google at the url: <http://code.google.com/apis/analytics/docs/concepts/gaConceptsCookies.html>

How can I disable cookies?

Most browsers accept cookies automatically, but you can also choose not to accept them. If you do not want your computer to receive and store cookies, you can change your browser security settings (Internet Explorer, Google Chrome, Mozilla Firefox, Safari etc...). There are several ways to manage cookies and other tracking technologies. By changing your browser settings, you can accept or reject cookies or decide to receive a warning message before accepting a cookie from the websites you visit. You can delete all cookies installed in the cookie folder of your browser.

Each browser has different procedures for managing settings.

Click one of the links below to get specific instructions:

Microsoft Internet Explorer

Click the 'Tools' icon in the upper right corner and select 'Internet Options'. In the pop up window select 'Privacy'. Here you can adjust the settings of your cookies or via the link <http://windows.microsoft.com/en-us/windows-vista/block-or-allow-cookies>

Google Chrome

Click the wrench in the upper right corner and select 'Settings'. Now select 'Show advanced settings' ("Under the hood") and change the 'Privacy' settings

. Here you can adjust the settings of your cookies or via the link

https://support.google.com/chrome/bin/answer.py?hl=en&answer=95647&p=cpn_cookies

Mozilla Firefox

From the drop-down menu in the upper left corner select 'Options'. In the pop-up window select 'Privacy'. Here you can adjust the settings of your cookies, or via the link

<http://support.mozilla.org/en-US/kb/Enabling%20and%20disabling%20cookies>

Apple Safari

From the drop-down menu in the upper right corner select 'Preferences'. Select 'Security'. Here you can adjust the settings of your cookies

or via the link <http://docs.info.apple.com/article.html?path=Safari/5.0/en/9277.html> If you do not use any of the browsers listed above, select "cookies" in the relevant section of the guide to find out where your cookie folder is located.

Disabling Flash Cookies

Click the link below to change the settings for Flash cookies.

http://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager02.html#118539 To disable

analytical cookies and to prevent Google Analytics from collecting browsing data, download the Google Analytics deactivation browser add-on: <https://tools.google.com/dlpage/gaoptout>

Update date: 20/05/2018

Purposes of processing for which consent is granted where

The personal data voluntarily provided will be processed for the following purposes, up to your opposition:

- navigation on this website;
- any request for contact, sending information requested by you;

- possible subscription to newsletters;
- possible compilation of data collection forms in dedicated areas;
- administrative and accounting activities in general. For the purposes of applying the provisions on the protection of personal data, the processing carried out for administrative and accounting purposes shall be those related to the performance of activities of an organisational,

administrative, financial and accounting nature, regardless of the nature of the data processed. In particular, the internal organisational activities, those functional to the fulfilment of contractual and pre-contractual obligations, information activities pursue these purposes.

Treatment methods - Storage

The processing will be carried out in automated and manual form, with methods and tools aimed at ensuring maximum security and confidentiality, by subjects specifically appointed for this purpose in compliance with the provisions of art. 32 of the European Regulation 2016/679. The data will be kept for a period not exceeding the purposes for which the data were collected and subsequently processed. The treatments connected to the web services offered by this site will be physically placed "in hosting" with third-party companies.

***Enterprise Srl** uses the "Cloud" service at third company, Tuoplanet srl - but whose Data Centers are allocated in Italy. Thanks to the reports **Enterprise Srl** will know, for example: the number of unique readers, openings, unique "clickers" and clicks; devices used to read the message (Iphone, Blackberry, Nokia...); operating systems used to read the message (Windows, Apple, Linux, Android...); detail on the activity of individual users for at least 90 days; users who have not yet confirmed their registration; e-mails sent by date/time/minute and by dispatch; e-mail delivered and not; e-mail forwarded; list of unsubscriptions for newsletters; who opened an e-mail or clicked a single link, in real time; users with message display problems; link tracking, that is the number of clicks made on the links of the message; click tracking, that is which links were clicked by whom; graphic map of the links to view the area that has received most interest; industry-related quality benchmarks to compare, and possibly improve, communications results.*

Scope of communication and dissemination

*Your data, the subject of processing, will not be disclosed and may be communicated to companies contractually linked to Enterprise **Srl** within the European Union, in accordance with and within the limits of the European Regulation 2016/679, in order to comply with contracts or related purposes. The data may be communicated to third parties belonging to the following categories:*

- persons providing services for the management of the information system used by Enterprise Srl and telecommunications networks, including e-mail, newsletters and website management: Aruba spa di Bibbiena Arezzo, Etesi srl (ISP), headquartered at 92016 Ribera, Via Alloro 8 (AG)*
 - studies or companies in the field of assistance and consultancy;*
 - competent authorities for the fulfilment of legal obligations and/or provisions of public bodies, on request. The subjects belonging to the aforementioned categories perform the function of Data Processor, or operate in total autonomy as separate Data Controllers. The list of managers is constantly updated and available at the headquarters of Enterprise Srl.*
- Any further communication or dissemination will take place only with your explicit consent.*

Nature of the contribution and refusal

*Apart from what is specified for navigation data, the user is free to provide personal data. The provision of data is optional but necessary. Failure to provide the data marked with the symbol *, may make it impossible to obtain what has been requested or to use the services of the data controller.*

Rights of the data subject

By contacting the Privacy Service that can be contacted by e-mail info@nebu.it, you will have the right, at any time, to obtain from Enterprise Srl, within one month of receipt of the request, a period that can be extended by two months, if necessary, taking into account the complexity and number of requests received, (cf. Art.10 12-GDPR) the confirmation that is or is not in progress a processing of personal data concerning you and, in this case, obtain access to personal data and the following information: a) the purposes of the processing;

- b) the categories of personal data concerned;*
- c) the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients from third countries or international organisations;*
- d) where possible, the expected retention period of personal data or, if that is not possible, the criteria used to determine that period;*
- e) the existence of the right of the data subject to ask the controller to rectify or delete personal data or to restrict the processing of personal data concerning him or her or to oppose their processing;*
- f) the right to lodge a complaint with a supervisory authority;*
- g) where the data are not collected from the data subject, all available information on their origin;*
- h) the existence of an automated decision-making process, including the profiling referred to in Article 22, paragraphs 1 and 4, and, at least in such cases, significant information on the logic used, as well as the importance and expected consequences of such processing for the data subject. (cf. Articles 12-13-14-15-22-GDPR) and/or (cf. Articles 16-17-18-19).*

Changes to the Privacy Policy

The Data Controller reserves the right to change, update, add or remove parts of this Privacy Policy at its discretion and at any time. The person concerned shall periodically verify any changes. In order to facilitate such verification, the information shall contain an indication of the date of update of the information. The use of the site, after the publication of the changes, will constitute acceptance of the same.

Last update 28/12/2018 - Vobarno (BS)