

WEBSITE PRIVACY POLICY

Tosetti Value SIM S.p.A., VAT no. 07115120011, with registered office in Corso Marconi, no. 10 in Turin (the "Company") has created this Policy to provide you with some information relating to the functionality of the website with regard to the processing of your data as users (**Section I**) and the use of cookies (**Section II**).

The Policy therefore applies as information pursuant to Article 13 of the 2016/679 EU Regulation ("**GDPR**"), for the Data Subjects accessing the website www.tosettivalue.it (the "**Website**"), and is valid exclusively for that site and with the exclusion of other websites that may be consulted by the user through links contained therein.

The Policy may be modified due to the introduction of new provisions; therefore, the user is requested to check this page periodically.

SECTION I - PROCESSING OF PERSONAL DATA

1. DATA PROCESSING

1.1. Data controller

- (a) With regard to this website, the data controller is Tosetti Value SIM S.p.A. (the "**Data Controller**").
- (b) For any clarification or for the exercise of user rights, the Data Controller may be contacted at the following email address: dataprotection@tosettivalue.it.

1.2 Data Processor

- (a) Pursuant to Article 28 of the GDPR, the Data Processor of the site is Luigi Cerrato.

1.3 Place of data processing

- (a) the processing of data generated by the use of the website takes place at the offices of the Data Controller and the Data Processor.
- (b) In case of necessity, the data connected to the newsletter service can be processed by the Data Processor or subjects appointed by it for this purpose at the relevant office.

2. DATA PROCESSED

2.1 Type of data, purposes and methods of processing

(a) Like all websites, this site also makes use of log files in which information collected in an automated way is stored during user visits. The computer systems and software procedures used to operate this website acquire, during their normal use, some data whose transmission is implicit in the use of Internet communication protocols. This information is not collected to be associated with identified users, but by its very nature could, by means of its processing and association with data held by third parties, allow for the identification of users. Some of the information collected could include the following:

- (i) internet protocol (IP) address;
- (ii) type of browser and device parameters used to connect to the site;
- (iii) name of the Internet service provider (ISP);
- (iv) date and time of visit;

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(v) web page of the visitor's origin (referral) and exit web page;

(vi) possibly the number of clicks.

(b) The aforementioned information is processed in an automated manner and collected in an exclusively aggregated form, in order to verify the correct functioning of the site, and for security reasons. This information will be processed according to the legitimate interests of the Data Controller.

(c) For security purposes (spam filters, firewalls, virus detection), automatically recorded data may possibly also include personal data such as the IP address, which could be used, in accordance with applicable laws, in order to block attempts to damage the site itself or to damage other users, or in any case harmful activities or those of a criminal nature. Such data is never used for the identification or profiling of the user, but only for the protection of the site and its users.

(d) The site allows the user to enter communications or specific requests: in this case, the site records some identification data of the user, including name, surname and email address for the purpose of communication initiated by the user. This data is voluntarily provided by the user at the time of the communication. By entering his/her personal data, the user consents to such data being processed by the Data Controller.]

2.2 Data retention period

(a) The data collected by the site during its operation is used exclusively for the purposes indicated above and kept for the time strictly necessary to carry out the activities specified, and in any case for no longer than 3 months.

(b) Data used for security purposes (to block attempts to damage the site) is kept for the time strictly necessary to achieve the previously indicated end.

2.3 Data provided by the user

(a) The optional, explicit and voluntary sending of e-mail messages through the functionality of the site or to the e-mail addresses on the same involves the subsequent acquisition of the sender's address, necessary to respond to requests, as well as any other data and information included in the message.

(b) The data and information that users of the site may communicate through the services and tools of the site, is provided by the user knowingly and voluntarily, exempting the Controller from any responsibility regarding any related violations of legal provisions.

(c) If the user provides or otherwise extracts personal data from third parties, he/she acts as an independent data controller and in this case warrants that there is an appropriate legal basis pursuant to Articles 6 and 9 of the GDPR legitimizing this processing. It is also up to the user to verify that they have permission to enter content protected by national and international regulations.]

2.4 User Portal

The Website has a reserved area dedicated to online viewing of the cultural information magazine "*Infinito*" which acts as a user portal, and is accessible with a Username and Password.

3. USER RIGHTS

3.1 The Data Subject can exercise all the rights set out in Articles 15-22 of the GDPR by contacting the Data Controller at the addresses referred to in paragraph 1.

3.2 In particular, the Data Subject has the right to:

(a) receive confirmation regarding the processing or lack thereof of Personal Data, even if not yet recorded, and receive such notice in a comprehensible form;

(b) obtain, among other things, the indication (i) of the origin of the Personal Data; (ii) the purposes and methods of the processing; (iii) the identity of the Data Controller; (iv) of the recipients or categories of recipients to whom the Personal Data may be communicated or who may become aware of it, including those acting as Data Processors; (v) the categories of Personal Data in question; (vi) whenever possible, the expected retention period or the criteria used to determine it; (vii) notice of the existence of the right to request rectification, cancellation of Personal Data or limitation of the processing of Personal Data; (viii) notice of the existence of the right to object to the processing; (ix) the right to lodge a complaint with the supervisory authority; (x) the existence of an automated decision-making process, including profiling;

(c) obtain: (i) the correction or integration of Personal Data; (ii) the limitation of processing, where possible; (iii) the portability of Personal Data, where applicable; (iv) the attestation that the operations referred to in numbers (i) and (ii) sub c. they have been brought to the attention, also with regard to their content, of those to whom the Personal Data have been communicated or transmitted, except in the case where this fulfilment proves impossible or involves a use of means manifestly disproportionate to the protected right;

(d) obtain: (i) the cancellation of Personal Data in the cases provided for by law;

(e) revoke consent to the processing of Personal Data;

(f) to object, in whole or in part: (i) for legitimate reasons, to the processing of Personal Data, even if pertinent to the purpose of the collection; and (ii) the processing of Personal Data for the purpose of sending communications;

(g) submit a complaint to the Authority for the Protection of Personal Data.

4. TRANSFER OF DATA TO NON-EU COUNTRIES

4.1 This site may share some of the data collected with services located outside the European Union, in particular with Google, Microsoft (LinkedIn) through social plugins and the Google Analytics service. The transfer is authorized and strictly regulated by Article 45, paragraph 1 of EU Regulation 2016/679, for which no further consent is required. The companies mentioned above warrant their adherence to the Privacy Shield.

4.2 Data will never be transferred to third countries that do not comply with the conditions set out in Article 45 et seq. of the EU Regulation.

5. SECURITY OF THE DATA PROVIDED

5.1 This site processes the data of users in a proper and lawful manner, adopting appropriate security measures to prevent unauthorized access, disclosure, modification or unauthorized destruction of data. Processing is carried out using IT and/or telematic tools, and organizational methods strictly related to the purposes indicated.

5.2 In addition to the Data Controller, in some cases, access to the data may be granted to categories of subjects involved in the organization of the Company (lawyers, administrative staff, system administrators)

or external subjects (such as third party technical service providers, hosting providers, IT companies). In this case, they are appointed as Data Processors pursuant to Art. 28 of the GDPR.

SECTION II - COOKIES

1. TYPE OF COOKIES

(a) The website www.tosettivalue.it uses cookies to make the user's browsing experience easier and more intuitive: cookies are small text strings used to store some information that may concern the user, his preferences or the Internet access device (computer, tablet or mobile phone) and are mainly used to adapt the operation of the site to the user's expectations, offering a more personalized browsing experience and memorizing choices made previously.

(b) A cookie consists of a reduced set of data transferred to the user's browser from a web server and can only be read by the server that effected the transfer. This is not executable code and does not transmit viruses.

(c) Cookies do not record any personal information and any identifiable information will not be stored. If you wish, you can prevent the saving of some or all cookies. However, in this case the use of the site and the services offered may be compromised.

Below are the types of cookies:

1.2 Technical cookies

(a) Among the technologies used to store information on the user's computer, the best known and used is that of HTML cookies. They are used for navigation and to facilitate access and use of the site by the user. They are necessary for the transmission of communications on the electronic network or to the supplier to provide the service requested by the customer.

(b) The settings for managing or deactivating cookies may vary depending on the Internet browser used. In any case, the user can manage or request general deactivation or cancellation of cookies by modifying the settings of his/her browser. This deactivation can slow down or prevent access to some parts of the site.

(c) The use of technical cookies allows safe and efficient use of the site.

(d) Cookies that are inserted in the browser and retransmitted, either through Google Analytics or through the statistics service, are technical only if used for the purpose of site optimization directly by the owner of the site, which can collect information in aggregate form on the number of users and how they visit the site. Under these conditions, the same rules apply to analytics cookies, in terms of the information and consent provided for technical cookies.

(e) From the duration point of view we can distinguish between temporary session cookies, which are deleted automatically at the end of the browsing session and are used to identify the user and thus avoid login to each page visited, and persistent cookies, which remain active in the PC until expiry or cancellation by the user. They are not stored permanently but only for the duration of navigation until the browser is closed and disappear when the browser is closed. Their use is strictly limited to the transmission of session identifiers consisting of random numbers generated by the server necessary to allow safe and efficient exploration of the site.

1.3 Third-party services:

The Site may contain links to other Websites that have their own privacy policy which may differ from that adopted by tosettivalue.it, which therefore is not responsible for these sites.

2. BROWSER CONFIGURATION SUPPORT

(a) The user can manage cookies also through his/her browser settings. However, deleting cookies from the browser may remove the preferences set for the site.

(b) For further information and support, you can also visit the specific help page of the web browser you are using:

(i) Internet Explorer: <http://windows.microsoft.com/en-us/windows-vista/block-orallow-cookies>

(ii) Firefox: <https://support.mozilla.org/en-us/kb/enable-and-disable-cookies-websitepreferences>

(iii) Safari: <http://www.apple.com/legal/privacy/it/>

(iv) Chrome: <https://support.google.com/accounts/answer/61416?hl=it>

(v) Opera: <http://www.opera.com/help/tutorials/security/cookies/>

CHANGES TO THIS DOCUMENT

This document, published at www.tosettivalue.it/privacy-policy/ constitutes the Privacy Policy of this site, including the information on cookies.

The last update of the document was made on 14 Dec. 2018.