

**POLICY CONCERNING THE PROCESSING OF PERSONAL DATA IN ACCORDANCE WITH REGULATION (UE) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of the 27<sup>th</sup> april 2016.**

In accordance with Regulation UE n. 2016/679 (GDPR) in connection to data handling, the company Parchettificio Garbelotto s.r.l. (P. IVA 01615550264), based in via Mescolino, 12 31012 Cappella Maggiore (TV) in the quality of processing controller, is required to provide information in relation to your personal data. The information document also concerns the processing carried out by entities engaged by the company to perform duties of a technical and organizational nature, outlined in paragraph 2.

**1. Object of the processing**

The owner deals with personal, identifying data (such as name, surname, corporate name, address, phone, mail, bank and payment reference) – hereinafter, “personal data” or “data” reported by you;

- on the occasion of conclusion of contracts for owner’s services;
- on the occasion of subscription to “newsletter” on our websites (see section 11);
- on the occasion of access to the section “contacts” in our websites, in order to request info and/or benefit from our services, filling in the specific form; (see section 11);
- on the occasion of exhibitions or promotional events;
- on the occasion of meeting with our commercial agents;

**2. Terms and conditions of the processing**

Your personal data are processed:

- A. Without the express consent for the following service finalities;
  - drafting commercial offers;
  - concluding contracts for owner’s services;
  - fulfilling pre-contractual, contractual, and fiscal obligations, resulting from relations with you in any modality;
  - fulfilling obligations established by law, by a regulation, by the Community legislation or by an authority order (for instance with regard to anti-money laundering);
  - exercising the owner’s rights, e.g. right of defense in court proceedings;
  - sending communicative and informative newsletter;
  - detecting the satisfaction level of the users concerning the product quality and/or provided services.
- B. Only with prior, specific and formal consensus, for the following Marketing finalities;
  - Forwarding via email correspondence and/or text messages and/or phone contacts, promotional newsletter, commercial communications and advertising material of products or services offered by the owner.

We underline that if you are already one of our clients, we could send you commercial communications concerning services and products similar to the ones you benefitted from, unless you disagree.

The treatment of your personal data is carried out via operations outlined by GDPR and precisely: collecting, registration, organization, conservation, consultation, elaboration, modification, selection, abstraction, comparison, utilization, interconnection, detention, communication, cancellation and distribution of data. Your personal data is subjected to both paper-based and electronic and/or automatized treatment.

The owner will treat your personal data for the necessary time in order to fulfill the finalities above-mentioned and in any case, no later than 10 years from the termination of the contract for service finalities and no later than 2 years from data collecting for marketing finalities.

**3. Nature of collecting and consequences of an eventual rejection**

For the conclusion and execution of a contractual relation, the collecting of personal data is of obligatory nature considering fiscal and law requirements, therefore the denial of providing such data will lead to the impossibility of establishing relations with our society. In this case, the data treatment does not need the formal consensus.

**4. Data access**

Your data may be made accessible for the finalities of art. 2.A) and 2.B);

- to staff and owner’s employees as internal responsible of the procedure and/or system administrators;
- to third companies or other subjects (for indicative purposes; accounting firm; work consultant; computer companies managing the company network; credit institution; specialists and consultants; trading agents; companies operating in the transport sector, society of commercial info; etc.) who carry out activities in outsourcing on behalf of the owner, as external responsible of the procedure.

**5. Data contribution and consequences in case of refusing to reply**

Data contribution for the finalities of art. 2.A) is mandatory. In case of lack, we cannot guarantee the services mentioned in art. 2.A).

Instead, data contribution for the finalities of art. 2.B) is facultative. It is possible to choose not to give any data or to later deny the possibility to process data previously provided. In this case, you will not have the possibility

to receive newsletter, commercial communication and advertising material concerning products and/or services provided by the owner. You will keep having the right to access services listed in art. 2.A).

## **6. Communication and diffusion**

Personal data and the associated handling will be object of communication:

With no need of an expressed consensus, the owner could communicate the data for the finalities found in art. 2.A) to group societies, supervisory bodies, legal authorities, and to all the subjects to whom the communication is mandatory by law for the fulfilment of the above-mentioned finalities. Such entities will process data as autonomous controller.

## **7. Data transfer**

Personal data will be stored in a server placed within the European Union. In any case, it is understood that the owner, in case of need, will have the right to move the server also to non-EU countries. In that case, the owner guarantees henceforth that the transfer will take place in accordance with the applicable law provisions, after having stipulated the terms of contract required by the European Commission.

## **8. Rights of data subjects**

In the capacity of subject, as requested by GDPR you have the right to:

I.. obtain the confirmation of presence or absence of your personal data, even if it is not registered, and their communication in an intelligible form.

II. obtain information about;

- a. The origin of personal data;
- b. The finalities and modalities of the procedure;
- c. The logic applied in case of procedures carried out with the aid of electronic devices.
- d. The details of the owner, manager and designated representative.
- e. The subjects or the category of supervised entities to whom personal data can be communicated or may become available as appointed representative in the State area, managers or delegates.

III. obtain:

- a. The update, and the revision of data, namely the integration of them in case of necessity;
- b. The cancellation, the anonymous transformation, or the blocking of data treated by violating the law. The data whose conservation is not requested in relation to the goals, for which they were collected or treated, shall be included.
- c. The documents attesting that the operations a) and b) and their content have been told to the subjects to whom the data has been disclosed or spread, with the exception of the case in which such performance appears to be unfeasible, or implies the disproportional use of means compared to the protected right.

IV. Object, partially or completely:

- a. To the procedure of your personal data for legitimate reasons, although relevant to the purpose of the collection.
- b. To the procedure of your personal data, for the purpose of sending sales and marketing material or carrying out market and communication surveys, by using automatized call systems with no intervention of operators via email and/or via traditional marketing modalities carried out through phone and/or snail mail. Please note that the right to object to direct marketing finalities, through automatized modalities, concerns the traditional ones and that, in any case, it does not affect the possibility of the interested party to exercise the right of complete or partial opposition. Consequently, the interested party can decide to receive communications via traditional modalities namely automatized communications or no communications at all.

If applicable, the subject has the rights of rectification, to erasure, of data portability, of opposition and the right to complain to the Competition Authority.

## **9. Procedures for the exercise of rights**

In any moment, you can exercise the right by sending:

Either a registered letter to Parchettificio Garbelotto S.r.l based in via Mescolino, 12 31012 Cappella Maggiore (TV).

Or an e-mail to: [info@garbelotto.it](mailto:info@garbelotto.it)

## **10. Owner, manager and officers**

The controller of the procedure is Parchettificio Garbelotto S.r.l. based in via Mescolino, 12 31012 Cappella Maggiore (TV).

The updated list of the people in charge of the procedure is kept at the headquarters of the controller of the procedure.

### **11. Data collected and treated by our websites and Cookie policy**

Parchettificio Garbelotto S.r.l. based in via Mescolino, 12 31012 Cappella Maggiore (TV), in quality of owner of the procedure manages the websites;

- <http://www.garbelotto.it>
- <http://www.garbelotto.com>

The following information comply with the existing legislation, in particular with regard to the online collection of personal data, aiming at identifying the minimal measures that must be implemented in relation to the people concerned, to guarantee the loyalty and legality of such practices. With the aim of providing a complete service, our portal may contain links to other websites, not managed by Parchettificio Garbelotto S.r.l.. Parchettificio Garbelotto S.r.l. declines any responsibility whatsoever with regard to errors, contents, cookie, publication of inappropriate content, advertising, banner or files that do not comply with the current regulatory provisions of websites not managed by the society, accessible through links found in the webpages of its own blog and/or other pages of the portals:

- [www.clipup.it](http://www.clipup.it)
- [www.clipupsystem.it](http://www.clipupsystem.it)
- [www.clipupsystem.com](http://www.clipupsystem.com)

Parchettificio Garbelotto S.r.l., declines any responsibility concerning what users' personal data can be subjected to in case of access to other portals via links, accessible from the above-mentioned websites, owned by the company itself.

### **12. Place of data processing**

The processing of data generated by the utilization of company websites takes place at Parchettificio Garbelotto S.r.l. based in via Mescolino, 12 31012 Cappella Maggiore (TV).

In case of necessity, the data connected to the newsletter service can be processed by the responsible of the procedure or subjects commissioned by him for that purpose within the relative location.

### **13. Data treated by the websites**

Like all the other websites, also

- [www.clipup.it](http://www.clipup.it)
- [www.clipupsystem.it](http://www.clipupsystem.it)
- [www.clipupsystem.com](http://www.clipupsystem.com)

use log files where the info collected automatically (and possibly paper-based) are kept for an amount of time necessary to achieve the goals why they are collected. The collected information could be the following:

- Internet protocol address (IP);
- Browser type and indicators of the device used to access the website;
- Name of the internet service provider (ISP);
- Operating system;
- Date and time of the visit;
- Web page of visitor's origin (referral) and exit;
- Info on the visited pages by the users within the website.
- Possibly numbers of clicks;
- Review of the internal path and other parameters related to the operative system and the user's IT environment

Such information is processed in an automatized form and collected exclusively in an aggregated form, in order to verify the correct functioning of the website and safety reasons.

Such information will be treated based on the legitimate interests of the owner. For security purposes (antispam filters, firewall, virus detection), the automatically registered data can include also personal data like the IP address, which can be used, in accordance with the existing laws, with the purpose of blocking the attempts of damaging the site itself or harming other users, or at least harmful activities or criminal acts. Such data have never been used for user identification or profiling, but only for purposes of protection of the website and its users such information will be treated in accordance with the interests of the owner.

Whenever the websites allow the insertion of comments, or in case of specific service required by the user, including the possibility of sending the Curriculum Vitae for an eventual business relationship, every site automatically detects and registers some identifying data of the user, email address included. Such data are intended to be voluntary provided by the user when requesting the service. Inserting a comment or other information, the user expressly accepts the privacy policy, and agrees that the inserted contents are freely diffused also to third parties. The received data will be exclusively used for the provision of the requested service and only for the time necessary for the providing of the service.

The information that the websites' users will make public through services and the instruments made available by them, are consciously and voluntarily provided by the user, exonerating the present websites from any responsibilities in relation to possible law breaches. It is up to the user to verify the ownership of permits for the placing of personal data of third parties, or for the contents protected by national and international regulations.

The personal data provided by the users accessing our websites and taking advantage of our services (e.g. newsletter) or accessing the section 'contacts', with the aim of requesting info and/or taking advantages of the offered services, will be used only to offer the service, unless the communication is imposed by law obligations or is considered extremely necessary for the fulfilling of the user's requests. The user can fill out the specific form, including name, surname, the province of origin and the email address (mandatory fields) and the other facultative fields. The data conservation will be carried out for the period strictly necessary for the achievement of the above-mentioned finalities, in any case not exceeding 2 years.

The provision of personal data is facultative. However, the lacking or incorrect provision, even partial, of the requested data in the fields of the different applications, marked by an asterisk, will determine the impossibility of proceeding with the provision of new services. The facultative, explicit and voluntary dispatch of emails will involve the acquisition, on our part, of the address of the sender, as well as the acquisition of other eventual personal data inserted in the communication.

When asking for services and/or answering to questions and/or filling in the note field, users are requested not to send names and/or other data concerning third parties. The procedures connected to the web services are carried out through the adoption of minimal safety measures provided for by regulation UE 2016/679.

### **Data transfer to non-EU countries.**

Company sites could share some of the collected data with localized services outside the European Union. In particular with Google, Facebook and Microsoft (LinkedIn) through the social plugin and the services offered by Google Analytics. The transfer is authorized based on specific decisions of the European Union and on the guarantor for the protection of personal data, in particular the decision 1250/2016 (Privacy Shield), for which no additional consensus is needed.

### **Cookie Policy**

This extensive disclosure has the specific aim of illustrating the types and modalities of usage, as well as explaining which actions undertake to refuse or eliminate cookies present on our websites.

What are cookies?

Cookies are small files, which are stored on a user's computer and contain information about the users and the navigation carried out with the aim of improving the internet utilization and the navigation itself. More specifically, cookies are sent by the server to the user's terminal (usually from browser), where are stored to be later retransmitted to the same website, on the following visit of the same user.

In order to achieve a correct regulation of such devices, it is necessary to distinguish them based on the finalities pursued by the users, considered that there are no technical characteristics, which would differentiate them from each other.

The two main subdivisions concern:

- First-party cookies/ third-party cookies: the first ones directly installed by the manager of the websites on the user's terminal, while the second ones are installed by a different website by means of the manager of the website visited by the user.
- Technical cookies/ profiling cookies: this distinction concerns the pursued finalities. The first ones are used only in order to 'carry out the transmission of a communication on an electronic communication network, or to the extent necessary for the supplier of a service explicitly required from the subscriber or the user to provide such service'. In other words, they are used for the sole purpose of contributing to the correct functioning of the website, or to improve the availability from the user. They are not used to additional purposes and are normally installed by the owner or manager of the website. The profiling cookies are instead aimed at creating profiles connected with the user and are utilized in order to send marketing messages in accordance with the preferences expressed during the web navigation.

Cookies

#### **Technical cookies**

1. Session cookies (PHPSESSID). It is stored in the user's pc for purely technical-functional needs, for the transmission of session identifiers necessary to consent the safe and efficient exploration of the website; it is deleted at the end of the 'session' (hence the name) with the closure of the browser. This cookie allows the correct functioning of the website and the visualization of the contents on the device. The use of such cookies is necessary for the functioning of the website

2. Cookie display Cookie Consent.

In accordance with the regulations expressed by the cookie normative, it is necessary that the owner of the websites

- [www.clipup.it](http://www.clipup.it)
- [www.clipupsystem.it](http://www.clipupsystem.it)
- [www.clipupsystem.com](http://www.clipupsystem.com)

keep track of the consent provided by the users, utilizing such profiling cookies, social network, analysis not anonymous.

Moreover, analytical third-party cookies, are used. They are comparable to technical cookies with due regard to specific circumstances, with which we comply, as described in the continuation of the text. Such cookies are listed as it follows.

#### Google Analytics

Generally, analytic cookies are the ones that collect information in aggregated form about how the user utilizes the website, in order to evaluate the activity for statistical purposes. Our portals use Google Analytics, namely cookies provided by Google Inc. To the presented purposes, the information generated from the cookie, concerning the utilization of the website by the User, are transmitted and stored within Google's server. To the presented purposes, by way of illustration, Google Inc stores the information collected by the cookie on servers, which can be stationed in the Us or other countries. Google reserves the right to transfer the information collected with the cookie to third parties, if this is required by law or if the third party processes information on his behalf. Further information concerning privacy and its use are available directly from the websites of the respective operators. The use of such cookies is not essential for the correct functioning of the website. Our webmaster will select the information concerning the usage of Google Analytics, in order to anonymously collect user data. Moreover, the webmaster will select the settings in such a way that Google cannot encounter the collected data.

Google analytics is a service provided by: Google Inc.

Extended reporting: <https://support.google.com/analytics/answer/6004245?hl=it>

Settings and consensus: <https://tools.google.com/dlpage/gaoptout?hl=it>

- Profiling cookies of third parties  
Cookie for the content sharing via social plug-in  
This services allow to interact with social networks, o with other external platforms, directly from the pages of our website. Interactions and information acquired from our website are in any case subjected to privacy settings of the user, concerning every social network. In the case of an installed service interacting with social network, it is possible that the service collects traffic data concerning the pages where it is installed, even if the users do not use the service.

#### 1. Google+

Google+ is a service provided by: Google Inc.

Extended reporting: <http://www.google.com/intl/it/policies/privacy/>

Settings and consensus: <http://www.youronlinechoices.com/it/le-tue-scelte/>

#### 2. Facebook

Facebook is a service provided by: Facebook Inc.

Extended reporting: <https://www.facebook.com/privacy/explanation>

Settings and consensus: <http://www.youronlinechoices.com/it/le-tue-scelte>

#### 3. LinkedIn

LinkedIn is a service provided by: LinkedIn Corporation

Extended reporting: <https://www.linkedin.com/legal/privacy-policy>

Settings and consensus: <http://www.youronlinechoices.com/it/le-tue-scelte>

#### 4. Twitter

Twitter is a service provided by: Twitter, Inc.

Privacy report: <https://twitter.com/privacy?lang=it>

Cookie policy: <https://support.twitter.com/articles/20170519-uso-dei-cookie-e-di-altre-tecnologiesimili-da-parte-di-twitter#>

Settings and consensus: <https://support.twitter.com/articles/20170405#>

#### 5. Pinterest

Pinterest is a service provided by: Pinterest, Inc.

Privacy report: <https://about.pinterest.com/it/privacy-policy>

Settings and consensus: <https://help.pinterest.com/it/articles/personalization-and-dataother-websites>

#### 6. Instagram

Instagram is a service provided by: Instagram, Inc.

Privacy report: <http://instagram.com/about/legal/privacy/>

Settings and consensus: [https://help.instagram.com/284802804971822?helpref=page\\_content](https://help.instagram.com/284802804971822?helpref=page_content)

#### Cookie of embedded services with social implications

In some pages of the website, in order to visualize presentations, videos or maps, plugins of integrated services are used with social implications. Such plugins upload cookies from YouTube, Google Maps (Google products) and their utilization is comparable to what has been said for cookies interactive with social networks. For this reason, the identical implications and characteristics are the following ones:

1. Youtube

Youtube is a service provided by: Google Inc.

Privacy policy: <https://www.google.it/intl/it/policies/privacy/>

Settings and consensus: <http://www.youronlinechoices.com/it/le-tue-scelte>

2. Google Maps

Google Maps is a service provided by: Google Inc.

Privacy policy: [https://www.google.com/intl/it\\_it/policies/privacy/](https://www.google.com/intl/it_it/policies/privacy/)

Settings and consensus: <http://www.youronlinechoices.com/it/le-tue-scelte> or  
[http:// www.google.it/settings/ads](http://www.google.it/settings/ads)

The acquisition of the consent to using cookies for sharing contents through social plug-in and/or service cookies embedded with social implications, is expressed by the user browsing the access page to the website, or clicking any element, or clicking the popup banner in the initial page as well as any other page, which can be accessed through the website.

In order to disable the cookies used by the following website directly from the browser:

1. Chrome → <https://support.google.com/chrome/answer/95647?hl=it>
2. Internet Explorer → <http://windows.microsoft.com/it-it/internet-explorer/deletemanage-cookies#ie=ie-11>
3. Opera → <http://help.opera.com/Windows/10.00/it/cookies.html>
4. Safari for mobile devices → [http://support.apple.com/kb/HT1677?viewlocale=it\\_IT](http://support.apple.com/kb/HT1677?viewlocale=it_IT)
5. Safari for desktop → [https://support.apple.com/kb/PH19214?locale=it\\_IT](https://support.apple.com/kb/PH19214?locale=it_IT)
6. Firefox → <https://support.mozilla.org/it/products/firefox/protect-your-privacy/cookies>

If you use a Web browser not listed above, please refer to the documents or online guide of your browser to obtain further information. Users are advised that Parchettificio Garbelotto S.r.l act as a mere technical intermediary for the links above-reported and cannot bear any responsibilities in case of eventual changes on the part of the owners/Editor.

Our websites do not use first party profiling cookies.

#### 12. Modifications to the present document

The present document constitutes the privacy policy of the company Parchettificio Garbelotto S.r.l. It can be subjected to adjustments or updates. Where it concerns adjustments or updates considered relevant, they will be reported with notifications to interested parties.

The document has been updated on 20<sup>th</sup> July 2018 to be compliant with the relevant regulatory provisions, and in particular in compliance with the EU Regulation 2016/679.

Cappella Maggiore (TV), 20<sup>th</sup> July 2018