

## MOLINO SONCINI CESARE - PRIVACY POLICY

Information for the treatment of personal data, as defined by Article 13 of Italian State Legislative Decree 196/2003.

In accordance with the above decree, Molino Soncini Cesare srl offers the following information to explain how personal data acquired via commercial or contractual dealings with us will be treated.

The relevant legislation requires us to treat personal data in a correct transparent manner, and to ensure the privacy and security of personal data held.

#### 1. REASONS FOR MAINTAINING RECORDS OF PERSONAL DATA

Personal data will be treated within the bounds of the normal day-to-day business activities of the Mill, and specifically with regards to the following areas:

- Management of lists of clients and suppliers
- Fulfilment of contractual obligations
- Fulfilment of administrative, fiscal, economic and legal obligations
- Management of commercial and financial relationships
- Management of activities connected to contractual relationships
- Management of our logistical systems
- Monitoring and management of access to and production of statistics relating to use of our site
- All other necessary organisational requirements

#### 2. METHODS OF TREATING PERSONAL DATA

With reference to the above objectives, personal data will be handled using IT and paper-based systems, using procedures that can guarantee both privacy and security, as required by Article 11 of State Decree 196/2003.

Specifically, we will employ security methods designed to avoid the loss of data, illegal use of such data, or unauthorised or illegal access to such data. Nonetheless, we would remind our clients that communications via Internet, whether email or webmail, might pass across national borders before they reach their intended recipient. Molino Soncini Cesare srl (hereafter "the Company"), therefore, accepts no responsibility for any unauthorised access to such data or their loss outside our control.

## 3. CONFIRMATION OF DATA

Users are required to confirm our right to store and use their personal data, where such permission is needed in order to meet the objectives laid out in Section 1 above.

## 4. ACCESS TO PERSONAL DATA BY OUR STAFF

Personal data of clients and/or suppliers can become known to our staff within the usual performance of their daily activities for the Company.

Personal data will not be passed on to other individuals - however, access to such data is permitted to specific external agencies and bodies, listed below:

- State and public bodies charged with the commercial and administrative monitoring of the Company.
- external bodies who carry out specific tasks for the Company (such as managing our information systems; our network of sellers; delivery systems; consultants and other professionals who work with the Company on our accountancy and fiscal work; banks and financial institutions, including electronic payment companies, for the management of payments and receipts).
- other bodies as authorised by law

### 5. COOKIES

A cookie is a string of data, stored by a website on the computer in question, that is transmitted by the web browser to a website every time a user visits it. Most websites use cookies. From the moment when the browser supplies such information to the website for each visit, it serves as a labelling system that allows the site to recognise a browser/user on its return. The domain name contained in the cookie clearly identifies the connection to the site, and where applicable, the connection to third-party services.



During a visit to our website, it is possible that any of the following types of cookies will be stored on users' computers:

- essential cookies: these allow the user to navigate around the website, and use specific functions contained therein as they wish, such as preferences relating to language or the possibility to make orders via the website.
- analytical cookies they serve for the collection of statistical data (aggregated and anonymised) regarding the use of the website by users. Most of these cookies are essential for the proper navigation within the website, and for its correct functionality.

Cookies can remain stored on the users' computer for a period that varies according to their type. Cookies can be of two types, temporary and long-duration.

- Temporary cookies: we use these "session" cookies on all our secure pages in order to assign and memorise a session ID to each user, in order to allow for uninterrupted navigation between the various parts of our website. Such session IDs are also used to help create reports for internal use, they do not allow for the identification of individual and do not leave recoverable information on users' hard drives. Nearly all the cookies found on websites are session cookies, which cease to be active when the Internet browser is closed.
- Long-duration cookies: the analytical cookies and third-party cookies are of long duration in that they are used to identify the (anonymised) visiting habits of users of our site over the long-term, and to provide additional functionality needed in relation to the personalisation of the website and its saved or archived content. They can be archived on the users' computer for a day, a week or years, depending on the function that they are intended to serve.

With reference to the services provided by Google Analytics, users are invited to visit Google's Privacy information page, available at: [INSERT LINK] http://www.google.it/intl/it/analytics/privacyoverview.html

The cookies used on our page are of the following types:

- Session cookies (temporary)
- Google Analytics cookies (temporary and of long-duration)

HOW TO DIABLE COOKIES VIA YOUR BROWSER SETTINGS

Users can decide whether to accept cookies via the settings of their browser. These settings can be modified in relation to specific or individual website or web applications.

Below is a list of external links relating to the browser settings for the most popular web browsers (links last checked January 2017):

Firefox: https://support.mozilla.org/en-US/products/firefox/customize/firefox-options-preferences-and-settings

Chrome: https://support.google.com/chrome/answer/95647?co=GENIE.Platform%3DDesktop&hl=en Internet Explorer/Edge: http://www.thewindowsclub.com/change-edge-browser-settings-windows-10

Safari: https://support.apple.com/en-eg/HT201265

Opera: http://www.opera.com/help/tutorials/security/cookies/

### **ACCEPTANCE**

The Molino Soncini Cesare e-commerce site uses technical cookies, for which the explicit acceptance of users is not needed. Users are free to block the use of technical cookies, by modifying the settings of their browser, but our e-commerce site could well not work as a result.

#### 6. NAVIGATIONAL DATA

The functionality of this website uses software that gathers personal data in the course of their normal functioning. Such data cannot be directly associated with identifiable individuals, but via deeper analysis and association with data retained by third-parties can indirectly lead to the identification of individual users, subsequent to a relevant judicial request by an Italian State authority. Such information include: IP numbers, or domain names of computers used by people who connect to our site, addresses (in URI - Uniform Resource Identifier - form) of the information requested, the time of such requests, the methods used to send requests to the server, the size of the files opened in response to those requests, the code number assigned to the various server responses (page loaded, error etc etc), and other relevant parameters related to the operating system and the IT environment of the user. Such data represent the register of links. Such data can, and will, only be used by Molino Soncini Cesare Srl with the intention of gatherin anonymised statistical data on the use of our website, and to ensure its correct functioning.



The register of links is maintained at the disposition of relevant judicial authorities, and shown to such only after an explicit legal request.

Our pages can include links to third-party and external websites. Molino Soncini Cesare Srl is not responsible for the privacy policies adopted by such external sites.

#### 7. INFORMATION VOLUNTARILY SUPPLIED BY USERS

The voluntary, explicit and optional supplying of information via website forms or email message by users to the addresses listed on this site implies the subsequent capturing and retention of the address of the user, alongside any other personal data supplied by users in such communications with the site. Specific information on such syntheses will be listed or made available in the section of the site that offers information fields or forms, or which require a log-in to reserved sections.

#### 8. NEWSLETTERS AND EMAILS

Molino Soncini Cesare Srl will NEVER sell, at any price, personal data supplied by clients, customers or suppliers, or their email addresses. Such data will only be used by us for the management of orders and for occasional promotional or advertising campaigns relating only to OUR products.

Newsletter emails will not be sent out more than 3 (THREE) times per month.

## 9. USERS' RIGHTS, as laid down by Article 7 of State Decree 196/2003

- /1. Interested parties have the right of confirmation of the existence or otherwise of personal data relating to them, even if they are not registered with our website, and to receive a copy of such information in an accessible form.
- /2. Interested parties have the right to know:
- a) the point of origin of personal data;
- b) the uses made of them, and the way they are handled;
- c) the methods used in cases of their handling via electronic means;
- d) identification of the Company Owner and other responsible employees, and the relevant Government representative of the Republic of Italy, where relevant, as required by Article 5, section 2 of the Decree.
- e) those individuals or categories of individuals to whom personal data can be communicated, or those who can come into possession of that data, as representatives of the Italian state, or its employees or representatives.
- /3. Interested parties have the right to obtain:
- a) updating of data; b) cancellation of data, anonymisation of data, or the blocking of data because they have been used in violation of relevant law, including when data does not have to be preserved in relation to the objectives for which the data was gathered or stored in the first place.
- c) confirmation that the operations cited above in a) and b) have been carried out, including the content, from whoever the data has been communicated to, except in cases where such is impossible or would lead to an excessive workload compared to the rights in question.
- /4. Interested parties can object, in part or in total, to:
- a) for legitimate reasons, to the use made of their personal data, as long as they are pertinent to the purpose of the gathering of that data;
- b) to the use of personal data for sales or promotional purposes, or for use in market research or commercial communication.

/5 Users can at any time exercise the rights conferred upon them by Article 7 of the Decree, and be supplied with a complete list of those able to access personal data, by sending an email to the Owner, at info@molinosoncinicesare.com, or by sending a registered letter to: MOLINO SONCINI CESARE, via Bassa dei Folli 141/A, 43132 Porporano (PR).

### /6 MODICATION OF PERSONAL DATA SUPPLIED BY USERS

Where personal information has been supplied to Molino Soncini Cesare via subscription to the reserved area of the site, or the completing of fields in the "Contact us" or "Newsletters" sections of the site, it is possible to request change of the data supplied at any time, by sending a registered letter to: MOLINO SONCINI CESARE, via Bassa dei Folli 141/A, 43132 Porporano (PR), or an email to info@molinosoncinicesare.com

#### /7 DELETION OF PERSONAL DATA

The elimination of users' personal data can be requested at at time by sending a registered letter to MOLINO SONCINI CESARE, via Bassa dei Folli 141/A, 43132 Porporano (PR), or an email to info@molinosoncinicesare.com

# 10. RESPONSIBILITY FOR HANDLING PERSONAL DATA

Responsibility for handling personal data lies with: MOLINO SONCINI CESARE, via Bassa dei Folli 141/A, 43132 Porporano (PR).