



## CALZONI SRL - Privacy and Cookie Policy

This Privacy Policy has the purpose of describing the aims and the methods whereby Calzoni S.r.l., as Data Controller (“**Company**” or “**Controller**”), collects and processes personal data relating to the user (“**User**”) who interacts with the website [www.calzoni.com](http://www.calzoni.com) (“**Website**”) and the different services offered by the latter.

The information contained in this Privacy Policy is provided in accordance with Art. 13 of Regulation (EU) 679 of 27 April 2016 (“**Regulation**”), as well as with the measures adopted by the Italian Data Protection Authority and the guidelines issued by European authorities.

The information regarding the processing of data is provided only for the Website and the processing carried out by the Company. It does not extend to processing carried out by third parties through other websites that may be accessed by the User via links. The Company shall not accept any liability in relation to said further processing; the User must make reference to the individual privacy policies of the third-party websites.

### 1. Data controller and place of the processing

The Data Controller is the Company Calzoni S.r.l., having its registered office in Via A. De Gasperi, 7 - 40012 Calderara di Reno - BO.

The data are processed primarily on the premises of the Data Controller, by technical personnel of the firm appointed as data processor within the territory of the European Union and, in the case of services entrusted to or offered by third parties, also outside Italy and/or outside the European Union. In the event of transfer of the data to countries that do not assure standards of protection equal to those in Italy, the Company shall adopt the necessary measures for the transfer.

### 2. Data processing methods

The Company shall process the User’s data adopting all appropriate security measures to prevent unauthorized access as well as unauthorized disclosure, modification or destruction of the data. Processing shall take place both manually and by means of computerized and/or telecommunication systems, according to organizational methods and logics that are strictly related and limited to the specified purposes.

### 3. Purposes of the processing of data and legal basis of the processing

Through its Website, the Company may process the User’s data for the following purposes:

- a. **Purpose of collecting applications via the “Work with us” section.** The Company offers the User an opportunity to send a job application to Calzoni S.r.l. by email through the “*Work with us*” section of the Website. To this end, the Company shall acquire and use the information provided by the User solely for the purpose of selecting and managing job applications. In any event, the User is advised not to include in his or her resume or in the data collection form any data of a sensitive nature (e.g. regarding state of health, political opinions, sex life, etc.) beyond what is strictly necessary by law for the purposes of selecting and assessing the resume (e.g. membership in a legally protected class).
- b. **Contact the Company.** The Company offers the User the possibility of sending communications to the Company, such as questions and requests for information about its activities, initiatives and services. In this regard, the personal data provided by the User (e.g. email address, phone number and/or any other information voluntarily provided by the User) shall be processed by the Company in order to take charge of, correctly manage and reply to the User’s communication. The legal basis of the processing is represented by the performance of the service expressly requested by the User and any refusal to provide the personal data shall result in the impossibility for the Company to manage and reply to the communication or the request for information.

- c. **Marketing purposes.** Within the scope of the contact requests sent to the Company, the User may freely express, by ticking the relevant box, his or her consent to the use of the personal data and contact information entered (e.g. email address) for the purpose of receiving marketing communications, such as newsletters, invitations to participate in market surveys and studies, information and promotional materials regarding the Company's services and/or offerings, delivered through both automated means (e.g. emails, SMS text messages) and traditional ones (e.g. ordinary mail, phone calls with an operator). In this case, the legal basis of the processing is the consent expressed by the User, who may freely choose whether or not to receive marketing communications: indeed, the granting of said consent by the User is wholly optional and shall in no way preclude the possibility of utilizing the services of the Company and the Website. The User may object to the sending of such communications and withdraw his or her consent, also partially for individual communication channels, by contacting the Company at the addresses provided in the "*Users' Rights and Contacts*" section, as well as via the link provided in the emails.
- d. **Pursuit of the legitimate interests of the Company and/or third parties.** The User's data may also be used for the purpose of exercising the rights and legitimate interests of the Company and/or third parties, for example the right of defense in legal proceedings, the management of claims and litigation, debt collection, and the prevention of fraud and/or unlawful activities. In these cases, although the provision of the User's personal data is not mandatory, it is nonetheless necessary to the extent that such data are closely connected to and instrumental in the pursuit of such legitimate interests, which shall not prevail over the rights and fundamental freedoms of the User, and any refusal to provide them may result in the impossibility of delivering the services requested (e.g. a request for information from the Company).
- e. **Fulfilment of legal obligations and/or applicable obligations.** The Company may also use the personal data provided by the User or otherwise acquired in the course of the interaction of the User with the Website for purposes connected to the fulfilment of legal obligations and compliance with regulations, national and Community legislation, as well as obligations arising from orders issued by legally empowered authorities, which represent the legal basis of the processing, it not being necessary to obtain the User's consent beforehand.
- f. **Conducting of aggregate statistical analyses on an anonymous basis** with the aim of improving the services offered by the Company via the Website. In this case, no consent shall be requested of the User, as the processing shall be carried out exclusively on anonymous data.

#### **4. Categories of data that undergo processing**

The Company receives and collects, via the Website, information about a User who visits the pages of the Website and makes use of the web services available there. In particular, the Company acquires and processes the following information.

##### **4.1 Data collected during navigation and through cookies**

When a User visits the Website, the latter collects some data such as the pages viewed, the links or buttons clicked by the User, the date and time of access, the User's IP address, the web browser and operating system used (so-called "*navigation data*"). By their very nature, navigation data enable the User to be identified also through processing and association with data in the possession of third parties. However, the Company shall use these data solely in order to obtain anonymous statistical information on the use of the Website for purposes that are strictly tied to the operation thereof. Navigation data could also be used in order to determine responsibility in the event of computer crimes resulting in damage to the Website.

For information about the collection of the User's personal data through cookies and similar technologies, please see the **Cookie Policy**.

##### **4.2 Data voluntarily provided by the User**



The Company limits the collection of information voluntarily provided by the User and processes only the information that is necessary for the purposes illustrated in section 3 above and for the expressly requested services. Furthermore, the Company may collect and process additional personal data, where voluntarily provided by the User, within the scope of the services offered by the Website, for example should the User contact the Company to report inefficiencies or malfunctions, exercise his or her rights in relation to the processing of personal data, etc. Such data shall be processed by the Company solely for purposes strictly connected to the User's request. Failure to provide the data may result in the impossibility of obtaining the service requested.

## 5. Communication of the data to third parties

Data provided by the User or collected via the Website within the scope of the relevant services (e.g. IP address) shall not be disseminated and may be disclosed, for the purposes and according to the terms illustrated in this Privacy Policy, to the parties specified below:

- Group companies, for administrative-accounting purposes, in pursuit of the legitimate interests of the Company and/or third parties, and for the purpose of providing the services expressly requested by the User;
- companies, contractors, consultants or professionals the Company appoints to to carry out tasks of a technical or organizational nature (e.g. IT service providers), or with whom or which the Company collaborates (including other Group Companies), for purposes related to the provision and operation of its services, or possibly for communication activities;
- persons, companies or professional firms that provide assistance and consulting services to the Company, particularly, but not exclusively, in relation to accounting, administrative, legal, tax-related and financial matters;
- parties that are authorized to access the data pursuant to the provisions of law or orders issued by the authorities.

The parties belonging to the categories specified above shall use the data in the capacity of autonomous data controllers in accordance with law or as data processors duly appointed by the Company.

Said parties may be based in EU and non-EU countries. In particular, in the event that said parties are based in non-EU countries, the Company shall adopt the measures envisaged by the Regulation to ensure the lawful transfer of the personal data to the same, including the conclusion of specific Data Transfer Agreements incorporating the standard privacy protection clauses approved by the European Commission.

A list of the parties to whom the data are or may be communicated, as well as an indication of the privacy measures adopted to ensure the lawfulness of transfers outside the EU, may be obtained from the Company by sending a request to the addresses provided in the "*Users' Rights and Contacts*" section.

## 6. Data retention

The data shall be processed only as long as is strictly necessary to carry out the activities specified in section 3 above and shall be deleted as soon as the purposes for which they were collected and processed no longer apply.

In particular, the Company shall undertake to delete the personal data of a User who has requested information or sent communications by contacting the Company via the Website 18 months after said data were provided. Secondly, the Company shall undertake to delete the personal data of a User who has sent a job application to the Company 18 months after said data were provided, if the applicant does not enter into an employment relationship/contract with the Company.



Finally, the data collected by the Company for marketing purposes shall be retained until such time as the User unsubscribes and/or objects to their collection. At the end of said period the data shall be stored in anonymous form for analytical and statistical purposes.

## 7. Users' rights and contacts

In the cases expressly provided for by law, and where applicable, the User may exercise the rights provided for under the Regulation. In particular, the User shall have the right to:

- obtain confirmation from the Data Controller as to whether personal data concerning him or her are being processed and, if so, access to information related to the processing (e.g. the purposes thereof, the categories of personal data concerned, the recipients or categories of recipients of the personal data, the retention period, etc.);
- request the rectification of inaccurate or incomplete data;
- request from the data controller the erasure of personal data (e.g. if the personal data are no longer necessary in relation to the purposes for which they were collected, the User withdraws the consent on which the processing is based, etc.);
- request a restriction of processing (e.g. in cases where the User contests the accuracy of the data; the processing is unlawful and the User opposes the erasure of the personal data; the personal data are required by the User for the establishment, exercise or defense of legal claims, even if the Data Controller no longer needs them; the User has objected to the processing, pending verification of the existence of legitimate grounds).
- receive the personal data concerning him or her in a commonly used machine-readable format (e.g. pdf) and transmit those data to another data controller, or have the personal data transmitted directly from one data controller to another, where technically feasible (so-called right to data portability).

The User shall further have the right to object, in whole or in part, on legitimate grounds, to the processing of personal data concerning him or her, also for marketing purposes (including in relation to individual channels).

Such rights may be directly exercised by sending a communication to the following email address: [Calzoni.Privacy@L3T.com](mailto:Calzoni.Privacy@L3T.com).

Finally, should the User deem that the processing of the personal data provided violates personal data protection legislation, the User shall have the right to lodge a complaint with the personal data protection authority ([www.garanteprivacy.it](http://www.garanteprivacy.it)).

## 8. Collection of data through Cookies

Cookies are small strings of text which websites visited by users download to their browsers, where they are stored until being retransmitted to the same websites when the users make their next visit. Cookies are used by the Company to operate its Website or improve the latter's performance, as well as to provide information about the Website or the User's navigation.

The Website uses cookies for both technical and additional purposes: technical cookies are used as they are strictly necessary for the technical operation of the Website and for the provision of the service expressly requested by the User (e.g. language setting, etc.), as better illustrated below. The cookies for additional purposes (e.g. profiling cookies, analytic cookies) are used to conduct analyses on the User's behavior on the Website, with the aim of improving its content and sending advertising messages in line with the preferences shown by the User while browsing the web, as explained below.

### 8.1 Technical cookies

Technical cookies are fundamental in order to enable the User to move through a website and use its functions, remember the User's choices (e.g. language, country of origin, etc.), distribute requests over a number of servers, memorize when the User gives his or her consent to certain options (for example by accepting the use of specific cookies via the consent banner), and enable the User to display content



and video with Adobe Flash Player. These are session cookies, i.e. they are stored until the browser is closed and do not require the User's consent.

## **8.2 Performance and analytics cookies of the Company**

These can be session or persistent cookies. Their use is limited to purposes tied to the performance and improvement of the website. These cookies make it possible to recognize, measure and keep track of the visitors to the Website, thereby enabling the Company to improve and perfect the Website itself, for example by establishing whether the User is able to retrieve information easily, or identifying which aspects of the website draw the most interest. These cookies are used by the Company in order to conduct anonymous statistical analyses on the ways in which users navigate through the Website, the number of pages viewed or the number of clicks on a page during navigation. Under privacy legislation these cookies are treated like technical cookies and therefore do not require the User's consent.

## **8.3 Third-party performance and analytics cookies**

The Company may also use third-party performance and analytics cookies on the website for the same purposes as illustrated above, relying in particular on Google Analytics and Google TAG Manager, in order to conduct analyses on the ways in which users navigate through the website, the number of pages viewed or the number of clicks on a page during navigation. The Company shall process the results of these analyses only if the third party uses the cookies in connection with the browser installed on the computer or on other devices used by the User to browse the website.

In order to activate these cookies, the User may choose to give his or her consent (which thus represents the legal basis of the processing) via the mechanism illustrated in the consent banner which provides information about the Company's cookies, and will be displayed on the homepage/landing page of the website when accessed by the User.

For information on how to manage the performance and analytics cookies installed by Google Analytics, as well as how to disable them, we advise users to review the Google Analytics Privacy Policy and cookie options at the following links:

[https://www.google.com/intl/it\\_ALL/analytics/learn/privacy.html](https://www.google.com/intl/it_ALL/analytics/learn/privacy.html)

<https://policies.google.com/technologies/cookies?hl=it>

## **8.4 Disabling cookies via the browser**

In addition to choosing whether to accept or reject all or part of the cookies used by the Website for additional purposes through the mechanisms illustrated in this Privacy Policy, in the future the User may also delete the cookies installed by the Website from his or her browser whenever desired, also through the browser settings options.

The majority of browsers are set to accept cookies. However, the User may configure a browser to limit the number of cookies accepted or block all cookies by changing the browser settings according to the following procedures:

### Microsoft Internet Explorer

Click the 'Tools' button in the top right corner and select 'Internet options'. Select 'Privacy' in the pop-up window. Here the User will be able to change the cookie settings.

### Google Chrome

Click the "wrench" icon in the top right corner and select 'Settings'. At this point select 'Show advanced settings' and change the 'Privacy' settings.

### Mozilla Firefox

Select 'Options' from the drop-down menu at the top left . Select 'Privacy and security' in the pop-up window. Here the User will be able to adjust the cookie settings.

### Safari

Select 'Preferences' from the drop-down settings in the top right corner. Select 'Security'; here the User will be able to adjust the cookie settings.



It should be noted, however, that disabling all of the cookies on the Website (including the technical ones) will have the effect of impairing some functions.

#### **8.5 Further information about cookies**

The website [www.allaboutcookie.org](http://www.allaboutcookie.org) contains instructions on how to manage cookies on the most widely used browsers; alternatively, the User can refer to the documentation accompanying the software used in his or her devices.

### **9. Amendments to the Privacy and Cookie Policy**

The Company reserves the right to introduce modifications to this Privacy Policy at any time on giving notice thereof, to be published on the website. We advise the User to check the website for updates. If the changes are particularly significant and/or have a major impact on the the User's rights, the Company may notify the User accordingly, also using different methods (for example by sending an email).

*Privacy and Cookie Policy updated on 5th July 2019*