

PURPOSE OF THIS NOTICE

This page describes our website policy with regard to processing the personal data of site users.

This policy, which meets the requirements of art. 13 of Legislative Decree no. 196/2003 (as amended by REG. EU 2016/679)– Law regarding the Protection of Personal Data, applies to all users of the web services accessed electronically through the website: tenutecapaldo.it, which is the home page of the official website for Tenute Capaldo.

This privacy policy only applies to the website tenutecapaldo.it and does not include any other websites that may be consulted through links.

The privacy policy also follows Recommendation no. 2/2001 adopted by the EU authorities for the protection of personal data at the meeting on 17 May 2001 of the Working Group set up under article 29 of Directive 95/46/CE to identify some of the minimum requirements for the collection of personal data on-line, in particular, the methods, timing and nature of the information that data controllers must provide to users when they connect to web pages, independently of the purpose of that connection.

THE “DATA CONTROLLER”

Following visits to our website, data may be processed with regard to users who have been or can be identified. The "data controller" for such data is Feudi di San Gregorio Società Agricola S.p.A. registered office and headquarters in Località Cerza Grossa, 83050 Sorbo Serpico (AV) VAT number 01753470648 (jointly the “Data Controllers”).

PLACE OF DATA PROCESSING

The data processing related to the web services provided through this site takes place at the offices of the Data Controllers referred to above and is handled only by the technical staff of the department with responsibility for data processing, or by other personnel with responsibility for occasional maintenance operations. No data deriving from the web services will be passed on to unauthorized third parties or disclosed. The personal data provided by users who have sent requests for information, job applications etc., are only used to provide the service requested and may therefore, only where strictly necessary, be passed on to internal personnel at Data Controllers who have been formally assigned the task of handling such data.

TYPE OF DATA PROCESSED

Site navigation data

The information systems and software processes that enable the website to function acquire some personal data during their normal operation and the transmission of such data is implicit in the use of the Internet communication protocols.

These data are not collected in order to link them with identified parties but they may, by their nature, through processing and association with data kept by third parties, enable users to be identified.

The following data come into this category: the IP addresses or domain names of the computers used by those consulting the website, the addresses of the resources requested in URI (Uniform Resource Identifier) notation, the time of the request, the method used to send the request to the server, the size of the file obtained in response, the numeric code indicating the status of the response provided by the server (successful, error, etc.) and other parameters connected with the user's operating

system and computing environment.

These data are only used in order to collect anonymous statistical information on the use of the site and to check that it is functioning correctly and are deleted immediately after processing.

The data may be used to establish responsibility in the event of any computer crimes committed against the website; with the exception of this eventuality, the data on website contacts are not currently kept for more than seven days.

Data provided voluntarily by the user

The optional, explicit and voluntary sending of electronic mail to the addresses indicated on this website entails the acquisition of the sender's email address, which is necessary in order to reply to requests, together with any other personal data that may be included in the email.

Specific privacy policy summaries will be displayed on the website pages allocated to particular request services.

COOKIES

No personal data from users is intentionally acquired by the site.

We do not use cookies for transmitting any personal information, nor do we use any types of so-called persistent cookies, or systems for tracking users. The use of so-called session cookies (which are memorized only temporarily on the user's computer and are erased when the browser is closed) is strictly limited to the transmission of session identifiers (consisting of random numbers generated by the server) and is necessary in order to allow safe and efficient exploration of the site.

The so-called session cookies used on this website enable us to avoid resorting to other IT techniques that may be detrimental to confidential navigation by the user; these cookies do not allow acquisition of the user's personal identification data.

VOLUNTARILY SUBMITTED DATA

Apart from the navigation data described above, the user is free to supply Data Controllers with the personal data required on request forms, or through contact with our different departments, to enable communications (for example requests for information, submission of a complaint, etc.). Failure to provide such data may mean that it is impossible to satisfy the request.

METHODS OF DATA PROCESSING

Personal data are processed in paper form as well as through electronic means and only for the period of time strictly necessary to achieve the purposes for which they are collected.

Specific security measures are followed in order to prevent the loss or illicit or improper use of data, and unauthorised access to data.

RIGHTS OF INTERESTED PARTIES

The parties to whom the personal data belong have the right at any time to check whether or not their data is being stored, to find out the contents and origin of the data, to check the accuracy of the data and to ask for the data to be added to, updated or corrected (art.7 of Leg. decree no. 196/2003).

Under the same article, users have the right to ask for the deletion, conversion into anonymous form or blocking of data that has been unlawfully processed, and also to refuse permission for any data processing, on legitimate grounds.

All such requests should be made to Data Controllers, at the email address:

info@tenutecapaldo.it

Privacy notice to clients and suppliers

In accordance with art.13 Leg. Decree 196/2003 no.196, we inform you that Data Controllers process the personal data of:

- clients, suppliers and commercial partners;
- individuals who have provided their personal data voluntarily (by telephone, in person in our offices or by fax or email etc.) to our commercial and marketing personnel.

In no cases does this involve processing personal data of a sensitive nature.

In accordance with the current legislation, our company guarantees that the processing of your personal data is carried out with full respect for your rights, fundamental liberties and dignity, particularly with regard to confidentiality, personal identity and the right to the protection of personal data.

Nature of the data collected and consequences of the failure to provide data:

The provision of your personal data, including through our sales agents who have been formally authorized to process these data, is necessary in order to fulfil our contractual obligations, and generally to comply with the requirements of the law: failure to provide such data may render it impossible for us to carry out our contractual agreements.

However, the provision of your personal data for the purposes of data processing as specified in points 4 and 5 below, is optional. We therefore ask you to sign and return the Consent form that can be found on the Privacy page of our website either in person to our agents, or by fax, post, e-mail etc.

Purposes of the data processing:

1. to comply with the obligations of the law, regulations, European Union regulations and statutory and tax legislation;
2. to fulfil contractual obligations that may apply with regard to the interested party;
3. to meet the operational requirements connected with our company's economic activity, such as keeping accounts, managing orders and invoicing, compiling internal statistics etc.;
4. for commercial purposes, such as sending commercial information and promotional material (by post, fax, e-mail or text message), marketing and market research concerning the so called "Feudi di San Gregorio Group" events, products and services;

5. to pass on and transmit your information for commercial and promotional purposes, (your company name, address, photos, events and promotional initiatives etc.), through our communication channels (internet sites, social network sites, company newsletters, e-mails, press releases, etc.);

6. to enable payment protection and debt management.

For the purposes described above, your personal data may be shared, if necessary, with:

Public Administrations and Authorities, where required by law;
our sales agents and credit companies or institutions that our company collaborates with in order to manage credits and debts;
any individuals and/or legal entities, public or private organizations (legal, administrative or fiscal consultancies, legal departments, Chambers of Commerce etc.), for whom such information is necessary or practical for carrying out our business activities, and exclusively for the purposes stated above;
for the purposes stated in point 5, to clients (actual and/or potential), newspaper publications and commercial partners.

The personal data processed by our company will only be disclosed in conformity with the purposes and using the methods indicated in point 5 above.

The data processing may be carried out with or without the use of electronic or automatized means by personnel inside and outside Data Controllers who have official responsibility for the processing and will include all operations stated in art. 4 par. 1, letter a, of Legislative Decree no. 196/03, that are necessary for this processing. In any case, in carrying out such processing, all precautionary measures will be taken to ensure the security and confidentiality of the data.

The Data Protection Law grants interested parties specific rights as stated in art. 7. In particular, these include the right to:

ask the data controller to confirm whether or not your personal data is being stored, and request that they are communicated in an intelligible form;

ask for information about the origin of the data, the purposes and methods used in processing it and the logic applied in the event of processing with the use of electronic equipment, the identification details of the data controller, the appointed personnel and the parties and categories of party with whom the data may be shared or to whom they may be made known;

to obtain the updating, correction, supplementation, deletion, conversion into anonymous form or blocking of data that has been unlawfully processed;

to refuse permission, wholly or in part, on legitimate grounds, for the handling of your personal data, even though it may be relevant for the purpose for which it is gathered, as well as to refuse permission, without the need to provide a reason, for the processing of your personal data for the purposes of sending promotional material, direct sales, conducting market research or for commercial communications.

The data processor concerned is Feudi di San Gregorio Società Agricola S.p.A. registered office and headquarters in Località Cerza Grossa, 83050 Sorbo Serpico (AV) VAT number 01753470648.

You may exercise these rights, including through an agent, by sending a request

without any formalities to the person in charge of data processing, the legal representative of Feudi di San Gregorio SpA, Contrada Cerza Grossa, 83050 Sorbo Serpico (AV), Tel. 0825.98.66.11 – Fax 0825.98.66.27 – E-mail: info@tenutecapaldo.it

You may also obtain an up-to-date list of all the designated personnel with responsibility for Data Protection in the same way.