

## **Privacy Policy of Tenuta San Carlo (ENGLISH)**

The data processed are used in compliance with current legislation on privacy (Italian Legislative Decree 196/2003 and GDPR 679/2016) and subsequent amendments. The data controller is responsible for this privacy statement. The purpose of the privacy policy is to provide maximum transparency regarding the information that the website collects and uses. This privacy policy applies exclusively to this website ([www.tenutasancarlo.com](http://www.tenutasancarlo.com)).

### **Data controller**

The data controller, or owner, is the one who determines the purposes and tools of the processing of personal data. Below are the references of the owner.

Tenuta S. Carlo Srl Agricola, P.I/CF 01311100539

Pec email address: [tenutasancarlo@pec.it](mailto:tenutasancarlo@pec.it)

Owner phone number: +39 339 5422633

### **Data processor**

The data processor is who processes personal data on behalf of the data controller, external to the company and with his own means, to whom the data controller contacts for the provision of certain services.

The updated list of data processors can always be requested to the data controller.

### **Purpose of processing the collected data**

#### **NEWSLETTER**

The processing of your data, collected and stored in relation to the compilation of the "newsletter form", has your consent as its legal basis and is carried out for commercial communication purposes.

The data controller proposes to its users, through the contact data issued to him, communications via email with promotional, informative and/or advertising content in relation to products or services of the owner and of the owner's business partners, including initiatives dedicated to subscribers to these commercial communications.

The user's personal data collected for this purpose is the "email address" (mandatory). The email address could be communicated to external suppliers who offer email sending services. These services may also allow the collection of data relating to the date and time the messages are displayed by the user, as well as the user's interaction with them, such as information on clicks on links inserted in messages. No personal data is transferred to the owner's business partners. The processing of the user's personal data does not include any automated decision-making process. The processing of personal data required for this purpose is to be considered optional for the provision of the entire service but necessary for the provision of the specific newsletter service.

#### **DATA ANALYSIS AND WEB STATISTICS**

The services contained in this section allow the data controller to monitor and analyze traffic data and are used to keep track of user or visitor behavior. Below are the web analysis and statistics services used by the application:

- Google Analytics (Google Inc.). Google Analytics is a web analysis service provided by Google Inc. Google Analytics collects and processes data, for further details see the following link. The application (public website and administrative portal) conveys Google cookies to collect information, and to collect consent to the use of cookies on behalf of Google. The data collected is exclusively aggregated (preceded with anonymization), therefore no personal data is collected.

### **Method, place and time of processing of the collected data**

#### **METHOD**

Data controller processes personal data by adopting appropriate security measures to prevent unauthorized access, disclosure, modification or destruction of personal data. The processing is carried out using IT and / or telematic tools, with organizational methods and with logic strictly related to the purposes indicated in this statement. In addition to the owner, in some cases strictly related to the purposes indicated in this statement, categories of employees involved in the organization of the site (administrative, commercial, marketing, legal, system administrators) or external subjects (such as suppliers) may have access to the data. of third party technical services, postal couriers, hosting providers, IT companies, communication agencies) also appointed, if necessary, as data processors by the owner.

#### **PLACE**

The data are processed at the owner's operating offices and in any other place where the parties involved in the processing are located. For needs related to the IT infrastructure or the use of third party services, the transfer of non-EU data to third countries, territories or one or more specific sectors within third countries could be envisaged, which guarantee an adequate level of protection. according to the European authorities. For more information, contact the owner.

#### **TIME**

Personal data are processed for the time necessary to ensure the provision of the service according to the intended purposes (with any particularities or exceptions indicated in this statement), in compliance with current regulations and legal obligations. In the event that it is not possible to define a pre-established maximum time, in order to ensure that personal data are not kept longer than necessary, the data controller carries out a periodic check on the activity status of users.

### **The rights of the data subject**

Pursuant to GDPR 679/2016 and national legislation, the interested party may, according to the methods and within the limits established by current legislation, exercise the following rights: 1. to access personal data; 2. to obtain the correction or cancellation of the same or the limitation of the treatment concerning him; 3. to oppose the processing of data; 4. to data portability; 5. to withdraw one or more consents to the processing; 6. to lodge a complaint with the supervisory authority (Privacy Guarantor); 7. as well as, more generally, to exercise all the rights that are recognized by the current provisions of the law. Requests should be addressed to the data controller, using the contact details published in this statement. The data controller is available for any further information.

## Cookies Policy

Cookies are usually text strings that the websites (so-called publisher or "first party") visited by the user or different sites or web servers (so-called "third parties") place and store within a terminal device in the availability of the user (so-called "active" identifiers).

### Types of cookies used

The following website may use different types of cookies.

Technical cookies (category "Strictly necessary") are those used for the sole purpose of transmitting a communication over an electronic communications network, or to the extent strictly necessary for the provider of an information society service explicitly requested by the contractor or by the user to provide this service.

They are comparable to cookies and other technical identifiers also the so-called "Analytical cookies" ("Performance" category) only if:

- they are used only to produce aggregate statistics and in relation to a single site or a single mobile application;
- for those of third parties, at least the fourth component of the IP address is masked;
- third parties refrain from combining analytical cookies, thus minimized, with other processing (i.e. customer files or statistics of visits to other sites) or from transmitting them to other third parties. However, third parties are allowed to produce statistics with data relating to multiple domains, websites or apps that can be traced back to the same publisher or business group.

Technical cookies do not require the acquisition of consent.

Cookies for storing preferences or for the use of features ("Functionality" category) are cookies useful for promoting the effective use of the site by the user and thus favoring the personalized browsing experience. They are used, for example, to keep track of the chosen language.

Marketing and profiling cookies ("Targeting" category) are used to bring back to specific, identified or identifiable subjects, specific actions or behavioral patterns recurring in the use of the features offered (pattern) in order to group the different profiles within homogeneous clusters of different size, so that it is also possible to modulate the provision of the service in an increasingly personalized way, as well as to send targeted advertising messages, i.e. in line with the preferences expressed by the user in the context of surfing the net.

Below is the list of cookies used (\*=alphanumeric string):

Technical Name	Domain	Category	Time validity	Description
bm_sz	.list-manage.com	Third parties, Functionality	4 hours	A functionality Cookie placed by Mailchimp to manage and control list.
_ga_* _ga	tenutasancarlo.com	First party, Strictly necessary	1 year 1 month	This cookie name is associated with Google Universal Analytics - which is a significant update to Google's more commonly used analytics service. This cookie is used to distinguish unique users by assigning a randomly generated number as a client identifier. It is included

				in each page request in a site and used to calculate visitor, session and campaign data for the sites analytics reports. The cookie _ga_* is used by Google Analytics to persist session state.
CookieScriptConsent	tenutasancarlo.com	First party, Strictly necessary	1 month	This cookie is used by Cookie-Script.com service to remember visitor cookie consent preferences. It is necessary for Cookie-Script.com cookie banner to work properly.
AWSELBCORS AWSELB	digitalasset.intuit.com	Third parties, Strictly necessary	15 minutes	The cookies AWSELB and AWSELBCORS are functionally the same cookies. The latter has an explicit SameSite attribute set because of changes made from Chrome 80 and upwards.
_abck	list-manage.com	Third parties, Strictly necessary	1 year	This cookie is used to analyze traffic to determine if it is automated traffic generated by IT systems or a human user

#### How to control cookies

You can change your browser settings in order to delete or prevent the storage of some cookies on your computer or mobile device in the absence of explicit consent. The "Help" section of your browser should provide information on how to manage your cookie settings. To find out how to do it on your browser, read below:

Internet Explorer:

<https://support.microsoft.com/help/17442/windows-internet-explorer-delete-manage-cookies>

Microsoft Edge:

<https://support.microsoft.com/en-us/microsoft-edge/eliminare-i-cookie-in-microsoft-edge-63947406-40ac-c3b8-57b9-2a946a29ae09>

Mozilla Firefox: <http://support.mozilla.com/en-US/kb/Cookies>

Google Chrome: <http://www.google.com/support/chrome/bin/answer.py?hl=en&answer=95647>

Safari: <http://support.apple.com/kb/PH5042>

Opera: <http://www.opera.com/browser/tutorials/security/privacy/>

Adobe (cookie flash): <http://www.adobe.com/privacy/policies/flash-player.html>

If you choose to block the installation of cookies, however, you will have to manually change some preferences each time you visit the site and it is possible that some services or certain functions are not available.

### **Information not contained in this privacy policy**

More information in relation to the processing of personal data may be requested at any time to the data controller using the contact information.

### **How is modified this privacy statement**

The data controller reserves the right to make changes to this privacy statement at any time, by giving notice to users on this page. Please therefore consult this page often, referring to the date of the last modification and the version of the document indicated at the bottom. In the event of non-acceptance of the changes made to this privacy statement, the user can request the data controller to remove their data. Unless otherwise specified, the previous privacy policy will continue to apply to personal data collected up to that moment.

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