

PRIVACY POLICY

DATA CONTROLLER

Browsing this website may lead to the processing of data concerning identified or identifiable persons.

Pursuant to the applicable regulation and to the provisions of article 13 of EU Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter the "EU Regulation"), we would like to inform you that the Controller of the Data you provide is Sublitex S.r.l., with registered offices in Alba (CN), Via S. Barbara 11, Italy, fiscal code and VAT no. 03737080048 (hereinafter the "Controller").

We would also like to inform you that the Miroglio Group has appointed a Data Protection Officer, who resides at the following address: Miroglio Group - Data Protection Officer, Via S. Barbara 11, 12051 – Alba (CN), Italy, email: dpo@miroglio.com.

METHODS FOR PROCESSING AND POSSIBLE RECIPIENT OF PERSONAL DATA

Data processing will take place with automated tools for the time strictly necessary to achieve the purposes for which they were collected, on the basis and for the purposes specified in the paragraphs of the section "Types of Processed Data" of this Privacy Policy.

Specific safety measures are complied with to prevent loss of data, illegal use or misuse of and unauthorised access to the same. Processing connected to this website's services is only carried out by personnel in charge of processing, or by Data Processors in charge of occasional maintenance operations.

Data may be disclosed to other companies belonging to the Miroglio Group or to third parties qualified as external Data Processors, exclusively for activities related to the purposes set forth in the specific disclosures on the site. A full list of external Data Processors may be requested at any time in writing from the Data Controller, Sublitex S.r.l., at the address specified in the section "Rights of the data subject".

Personal data will be processed within the European Union.

TYPE OF DATA PROCESSED

Browsing data

Computer systems and software procedures used for operating this website acquire, during normal operation, some personal data whose conveyance is implicit in the use of Internet communication protocols. This information is not collected to be associated to identified parties, but due to its very nature it might allow users to be identified through processing and association with data held by third parties. This category of data includes IP addresses or domain names of computers used by users connecting to the site, URI (Uniform Resource Identifier) of requested resources, time of request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response from the server (successful, error, etc.) and other parameters regarding the user's operating system and computer environment.

These data are only used to obtain anonymous statistical information about site use and to ensure its correct operation and are deleted immediately after processing. The data might be used to ascertain liability in the event of hypothetical computer crimes against the website: except for this eventuality, the data on web contacts currently do not persist longer than seven days.

Data intentionally supplied by the user

Browsing the website does not require the provision of any personal data by the user. The optional, explicit and voluntary sending of e-mail to the addresses listed on this site involves subsequent acquisition of the sender's address, required to respond to requests, and any other personal data

included in the message. Said data will only be used in order to follow up the user's request and they may be disclosed to third parties only when this is necessary for said purpose.

The processing of the data for such purposes does not require your consent, since the processing is necessary for the execution of a contract to which you are party or for the application of pre-contractual measures adopted at your request (article 6, subparagraph 1, letter *b* of the Regulation) or, where applicable, in order to fulfil a legal obligation (article 6, subparagraph 1, letter *a* of the Regulation).

The data will be processed with tools that protect the confidentiality and security of your data in accordance with the applicable privacy policy.

For the processing of data for purposes other than the ones mentioned above, said data will be retained for the time that is strictly necessary for the provision of the requested service to the user and they will be deleted immediately afterwards, without prejudice to other obligations of retention stipulated by law.

Cookies

For information regarding cookies on the website please refer to the Cookie Policy.

OPTIONAL NATURE OF DATA PROVISION

Except as specified for navigation data, the user is free to provide personal data when requested in special sections of the site. Failure to provide them may involve the impossibility to obtain what is required.

RIGHTS OF THE DATA SUBJECT

The subjects of the personal data have the right, at any time, to exercise their articles as they arise from articles 15 et seq. of the EU Regulation, among which: a) the right to be informed on the purposes and methods of processing; b) access; c) update and rectification; d) deletion, anonymisation or blocking; e) objection to processing, including objection to automated decision-making and profiling; f) withdrawal of consent; g) portability; h) limitation of processing.

The subjects of the personal data also have the right to lodge a complaint with the supervisory authority.

Said rights may be exercised by directly contacting the Controller at the e-mail address privacy@miroglio.com or by writing to Miroglio Group – Privacy Office, Via S. Barbara 11, 12051 – Alba (CN), Italy.

AMENDMENTS TO THE POLICY

Any entry into force of new industry regulations, as well as the constant review and updating of user services, may entail the need to change the method used for processing the personal data of the users. Our privacy policy therefore may change over time and we therefore urge the visitor to periodically refer to this page.