

Privacy Policy for the website: <http://www.sacrafamilia.it>

WHY DO WE HAVE THIS NOTICE

This page describes how the website is managed with regard to the processing of personal data of the users who visit it.

This notice is given also in accordance with Art. 13-14 of EU Reg. 679/16, to those who interact with the web services of the website <http://www.sacrafamilia.it>, which are accessible electronically from the address <http://www.sacrafamilia.it>.

This notice is provided only for the website <https://www.sacrafamilia.it>.

The website that refers to the domain <http://www.sacrafamilia.it> is the sole property of the company *Sacrafamilia Grandama Arte della Luce S.N.C. Società Agricola di Anna Mercandelli e Domenico Capeto* with registered offices in Via Garibaldi n.30, Godiasco Salice Terme (PV), *P.IVA/C.F.* (Italian tax ID) 02116690187, e-mail: info@sacrafamilia.it, certified e-mail: sacrafamilia@legalmail.it.

The purpose of this document is to give a general description of how the website <http://www.sacrafamilia.it> (hereinafter referred to as the website) is managed in relation to the processing of the personal data of the users who access it (the document does not include processing carried out on other websites that may be accessed by the user through links on the portal). We encourage our visitors to read the following terms of service carefully.

Sacrafamilia Grandama Arte della Luce S.N.C. Società Agricola di Anna Mercandelli e Domenico Capeto forthwith reserves the right to modify and/or supplement this policy at any time. Should this happen, it will be promptly updated on the website.

This document is based on the contents of the Privacy Policy applied by the Italian Data Protection Authority for the protection of personal data with reference to the processing of personal data of those users who connect to the official website <http://www.garanteprivacy.it>.

It is the intention of *Sacrafamilia Grandama Arte della Luce S.N.C. Società Agricola di Anna Mercandelli e Domenico Capeto* to conform its privacy protection policies to the provisions of the EU Reg. 679/16, including the precautions and procedures that the Authority has specified in the document on Privacy Policy published on the official website of the Authority.

COPYRIGHT

All the contents of the website: text, images, graphics, files (including this policy) and the information contained within this website are protected under all the rules of copyright, industrial law, and all other relevant regulations. Each product or company mentioned on this website is a trademark of its respective owners and is protected by the relevant regulations.

Therefore, nothing, not even in part, may be copied, modified, or re-sold, for profit or for any other purpose.

All photographs on the website are copyrighted.

USING THE WEBSITE

Under no circumstances can *Sacrafamilia Grandama Arte della Luce S.N.C. Società Agricola di Anna Mercandelli e Domenico Capeto* be held responsible for any damages, of any nature, caused directly or indirectly by accessing the website, by the inability or impossibility to access it, by the User's reliance on and use of the information contained therein. *Sacrafamilia Grandama Arte della Luce S.N.C. Società Agricola di Anna Mercandelli e Domenico Capeto* reserves the right to modify the contents of the website and the legal notes at any time and without notice.

ACCESSING LINKED EXTERNAL WEBSITES

Sacrafamilia Grandama Arte della Luce S.N.C. Società Agricola di Anna Mercandelli e Domenico Capeto is not responsible for the websites that can be accessed through the links within the website itself, provided as a simple service to network users. The fact that <http://www.sacrafamilia.it> provides these links does not imply approval of the websites themselves, on whose quality, contents and graphic design *Sacrafamilia Grandama Arte della Luce S.N.C. Società Agricola di Anna Mercandelli e Domenico Capeto* declines all responsibility.

Sacrafamilia Grandama Arte della Luce S.N.C. Società Agricola di Anna Mercandelli e Domenico Capeto is not responsible for information obtained by the user through their access of the websites linked to <https://www.sacrafamilia.it>.

Therefore, the completeness and accuracy of the information is the responsibility of the owners of the websites which are accessed under the conditions provided by them.

Sacrafamilia Grandama Arte della Luce S.N.C. Società Agricola di Anna Mercandelli e Domenico Capeto does not offer, or rather cannot offer, any assurance on the software that may be present on its own website or on external websites and cannot guarantee its quality, safety, and compatibility with the systems in use.

PRIVACY

Sacrafamilia Grandama Arte della Luce S.N.C. Società Agricola di Anna Mercandelli e Domenico Capeto guarantees that the processing of data, which may be also received by e-mail or electronic forms at the time of registration, if applicable, is in accordance with the provisions of privacy legislation (Art. 13 – 14 EU Reg. 679/16).

DOWNLOAD

The documents that may be available for download on this website, unless otherwise indicated, are freely available under the conditions established by the owner. *Sacrafamilia Grandama Arte della Luce S.N.C. Società Agricola di Anna Mercandelli e Domenico Capeto* does not assume any responsibility for the content of the documents or the characteristics of the products presented.

Data Controller

Following access to this website, any data relating to identified or identifiable persons left by interested parties and/or visitors to the website may be processed.

The Data Controller is *Sacrafamilia Grandama Arte della Luce S.N.C. Società Agricola di Anna Mercandelli e Domenico Capeto*, with registered offices in Via Garibaldi n.30, Godiasco Salice Terme (PV), *P.IVA/C.F.* (Italian tax ID) 02116690187, e-mail: info@sacrafamilia.it, certified e-mail: sacrafamilia@legalmail.it in the person of its pro tempore legal representative, Mrs. Anna Maria Mercandelli.

Types of Data Collected

The Personal Data collected by this Application, either independently or through third parties, may include: cookies, usage data, or data that visitors will voluntarily communicate to the email addresses of the owner of the website, if they intend to contact *Sacrafamilia Grandama Arte della Luce S.N.C. Società Agricola di Anna Mercandelli e Domenico Capeto*, and that have been specifically stated.

Other Personal Data collected may be indicated in other sections of this privacy policy or by means of notices displayed during the collection of the Data itself.

The use of cookies – or other tracking tools – by this website or the owners of third-party services used by this website, unless otherwise specified, is intended to identify the User and record their preferences for purposes strictly related to the provision of the services requested by the User.

The visitor assumes responsibility for the Personal Data of third parties published or shared through this website and guarantees to have the right to communicate or disseminate them, releasing the Data Controller from any liability towards third parties.

Method And Location of the Processing of the Collected Data

Processing Methods

The Owner shall process the Personal Data of the Users taking appropriate security measures to prevent unauthorised access, disclosure, modification or destruction of the Personal Data.

The processing is carried out by means of computer and/or electronic tools, with organisational methods and with logic strictly related to the indicated purposes. In addition to the Data Controller, in some cases, the Data may be accessed by categories of employees involved in the organization of the website (administrative staff, sales staff, marketing staff, legal staff, system administrators) or external parties (such as third party technical service providers, couriers, hosting providers, IT companies, communication agencies) who may be also appointed, if necessary, as Data Processors by the Data Controller. The updated list of those who are appointed as data processors can always be requested from the Data Controller.

Legal Grounds for Processing Data

The Data Controller processes Personal Data relating to the users of the website if one of the following conditions is met:

- The visitor has given their consent for one or more specific purposes; Note: in some jurisdictions the Data Controller may be authorized to process Personal Data without the User's consent or another of the legal bases specified below, until the User objects ("opts-out") to such processing. However, this does not apply if the processing of Personal Data is regulated by European legislation concerning the protection of Personal Data;
- Processing is necessary to carry out a contract with the visitor and/or to carry out pre-contractual measures;
- Processing is necessary to fulfil a legal obligation to which the Data Controller is subject;
- Processing is necessary to carry out a task of public interest or to exercise the powers vested in the Data Controller;

- Processing is necessary to pursue the legitimate interests of the Data Controller or of third parties.

However, it is always possible to ask the Data Controller to clarify the concrete legal basis of each treatment and in particular to specify whether the treatment is based on the law, provided for by a contract, or necessary to conclude a contract.

Location

The Data is processed at the operating offices of the Data Controller and in any other place where the parties involved in the processing are located. The User's Personal Data may be transferred to a country other than that in which the User is located. To obtain further information on the place of processing, the User can refer to the section on the details of the processing of Personal Data.

The User has the right to obtain information about the legal basis for the transfer of Data outside the European Union or to an international organisation governed by public international law or consisting of two or more countries, such as the UN, as well as about the security measures taken by the Data Controller to protect the Data. The communication and eventual disclosure of personal data take place only in accordance with the provisions of the Italian Privacy Law: with the consent of the interested parties or in legal cases in accordance with the rules contained in EU Reg. 679/16.

For further information, please contact the Data Controller.

Length of Retention Period

Data is processed and stored for the period of time required for the purposes for which it was collected.

Personal Data collected for purposes related to the legitimate interest of the Data Controller will be retained until such interest is satisfied.

The User may obtain further information regarding the legitimate interest pursued by the Data Controller in the relevant sections of this document or by contacting the Data Controller.

When processing is based on the User's consent, the Data Controller may retain the Personal Data for a longer period of time until such consent is revoked. In addition, the Data Controller may be obliged to retain Personal Data for a longer period in accordance with a legal obligation or by order of an authority.

At the end of the retention period the Personal Data will be deleted. Therefore, upon expiry of this term, the right of access, cancellation, rectification and the right to portability of the Data may no longer be exercised.

Categories and Types of Personal Data Being Processed

The computer systems and software procedures used to operate the website acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols.

This information is not collected in order to associate it with identified interested parties, but by its very nature could, through processing and association with data held by third parties, allow users to be identified.

This category of data includes IP addresses or domain names of computers used by users connecting to the website, URI (Uniform Resource Identifier) of requested resources, the time of the 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 relating to the operating system and computer environment of the user.

This data is used only to obtain anonymous statistical information on the use of the website and to check its proper functioning, and is deleted immediately after processing.

The data could be used to ascertain responsibility in the event of hypothetical computer crimes against the website: except for this possibility, the data on web contacts are not kept permanently, unless the user requests it (e.g. access to the pages of the Portal that summarize the services used, the information requested, etc.).

Data Provided Voluntarily by the User

The optional, explicit and voluntary sending of electronic e-mails to the addresses indicated on the Portal entails the subsequent acquisition of the sender's address, which is necessary to respond to requests, as well as any other personal data included in the message.

Specific summary information will be progressively reported or displayed on the pages of the website set up for specific requested services.

In any case, a specific privacy policy will be sent to the address provided by the user for their viewing and expression of consent.

Use of Cookies or Permanent User Tracking/Monitoring Systems

No personal data of the users is purposely acquired by the website.

No use is made of cookies for the transmission of information of a personal nature, nor are so-called persistent cookies of any kind used, i.e. systems for the permanent tracking of users.

The use of so-called session cookies is stored; this website stores the cookie related to the reproduction of music on the website for 24 hours, and is strictly limited to the transmission of session identifiers (consisting of random numbers generated by the server) necessary to allow the safe and efficient exploration of the Portal.

The so-called session cookies used on the Portal avoid the use of other IT techniques that could potentially compromise the confidentiality of the users' navigation and do not allow the acquisition of the user's personal identification data.

Optional Provision of Data

Apart from what is specified for the browsing information, the user is always free to provide personal data for the purposes for which he connects to the Portal.

However, failure to provide data may in some cases make it impossible to obtain what was requested.

Purpose of Processing of Collected Data

Any User data or data provided by the same is collected to allow the Data Controller to provide its Services, as well as for the following purposes: statistics and to contact the User.

To obtain further detailed information on the purposes of the data processing and on the Personal Data specifically relevant for each purpose, the User may refer to the relevant sections of this document.

User Rights

Users may exercise certain rights with regards to the Data processed by the Data Controller.

In particular, the User has the right to:

- Revoke consent at all times. You may revoke your consent to the processing of your Personal Data as expressed above.
- Oppose the processing of your data. The User may object to the processing of their Data when it takes place on a legal basis other than consent. Further details on the right of objection are given in the section below.
- Access one's own data. The User has the right to obtain information on the Data processed by the Data Controller, on certain aspects of the processing, and to receive a copy of the Data processed.

- Verify and request rectification. The User may verify the correctness of their data and request that it be updated or corrected.
- Obtain a limitation of processing. When certain conditions are met, the User may request that the processing of their Data be limited. In such a case, the Holder shall not process the Data for any other purpose other than their safekeeping.
- Obtain the cancellation or removal of their Personal Data. When certain conditions are met, the User may request the cancellation of their Data by the Data Controller.
- Receive their own Data or have it transferred to another holder. The User has the right to receive their Data in a structured format, of common use and readable by automatic device and, where technically feasible, to obtain the transfer without hindrance to another data controller. This provision is applicable when the Data is processed by automated means and the processing is based on the User's consent, on a contract to which the User is a party or on contractual measures connected to it.
- Lodge a complaint. The User may lodge a complaint with the relevant data protection supervisory authority or take legal action.

Details of the Right to Object

When Personal Data is processed in the public interest, in the exercise of public powers vested in the Data Controller, or to pursue a legitimate interest of the Data Controller, Users have the right to object to the processing of their Personal Data for reasons related to their particular situation.

Users are reminded that, if their Data is processed for direct marketing purposes, they may object to its processing without giving any reason. To find out whether the Data Controller processes data for direct marketing purposes, Users may refer to the respective sections of this document.

How to Exercise The User Rights

In order to exercise their rights, Users may address a request to the Data Controller without formalities by sending a communication to the e-mail address info@sacrafamilia.it, certified e-mail: sacrafamilia@legalmail.it. Requests shall be filed free of charge and processed by the Data Controller as soon as possible and in any event within one month.

Legal Defence

The User's Personal Data may be used by the Data Controller for defence in a court of law or in the stages leading up to a possible trial, against abuses of the User's utilisation of the same or related services.

The User declares to be aware that the Data Controller may be required to disclose the Data at the request of public authorities.

Specific Disclosures

At the User's request, in addition to the information contained in this privacy policy, this Application may provide the User with additional and contextual information regarding specific services, or the collection and processing of Personal Data.

This application does not support "Do Not Track" requests.

To find out if any third party services we use support them, please refer to their respective privacy policies.

PROCESSING OF SENSITIVE DATA

In the event that we receive a curriculum vitae containing sensitive personal data – i.e. in accordance with the provisions of EU Reg. 679/16, data concerning health conditions, political, religious or trade union opinions (or membership to such movements or organisations), judicial data and data concerning racial or ethnic origins – that does not contain an explicit written consent to the processing of such data, such consent will be requested explicitly and in writing. In the absence of a reply within 14 days, the data will be permanently deleted.

Please note that this privacy policy is for website users; in fact, in the appropriate sections of the website there are privacy notices for those who intend to contact *Sacrafamilia Grandama Arte della Luce S.N.C. Società Agricola di Anna Mercandelli e Domenico Capeto*, in order to apply for employment with the aforementioned company or who wish to request further information to evaluate new business relationships and use the services offered by *Sacrafamilia Grandama Arte della Luce S.N.C. Società Agricola di Anna Mercandelli e Domenico Capeto*.

Dedicated privacy policies will be sent for their approval and acknowledgement to the addresses indicated by the interested party.

Changes to This Privacy Policy

The Data Controller reserves the right to make changes to this privacy policy at any time by notifying Users on this page. You are therefore kindly requested to consult this page frequently, referring to the latest change date indicated at the bottom of the page. If the User does not accept the changes made to this privacy policy, they must cease using this Application and may request the Data Controller to remove their Personal Data. Unless otherwise stated, the above privacy policy will continue to apply to Personal Data collected up to that time.

If the changes involve processing whose legal basis is the consent, the Data Controller will collect the User's consent again, if necessary.

Legal Definitions and References

Personal Data (or Data)

Personal data is any information relating to a natural person, identified or identifiable, even indirectly, by reference to any other information, including a personal identification number.

Usage Data

This is the information collected automatically by this website (or by third-party applications that this website uses), including: IP addresses or domain names of computers used by the Users who connect to this Application, addresses in URI (Uniform Resource Identifier) notation, the time of the 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.), the country of origin, the characteristics of the browser and operating system used by the visitor, the various time details of the visit (for example, the time spent on each page) and details of the path followed within the Application, with particular reference to the sequence of pages consulted, the parameters relating to the operating system, and the User's computer environment.

User

The individual using this website, who must coincide with or be authorized by the Interested Party and whose Personal Data is subject to processing.

Interested Party

The natural or legal person to whom the Personal Data refers.

Data Processor (or Processor)

The natural person, legal entity, public administration and any other body, association or entity appointed by the Data Controller to process Personal Data, in accordance with the provisions of this privacy policy.

Data Controller (or Controller)

The natural person, legal entity, public administration and any other entity, association, or body that is responsible, even together with another controller, for decisions regarding the purposes, methods of processing personal data and the tools used, including the security profile, in relation to the operation and use of this Application. The Data Controller, unless otherwise specified, is the owner of this Application.

This Application

The hardware or software tool through which User Personal Data is collected.

Service

The Service provided by this Application as defined in the relevant terms (if any) on this website/application.

European Union (or EU)

Unless otherwise stated, any reference to the European Union in this document shall be deemed to extend to all current Member States of the European Union and the European Economic Area.

Cookie

Small amount of data stored within the User's device.

Legal Reference

Notice to European Users: This privacy policy has been drafted on the basis of current legislation including Articles 13-14 of EU Reg. 679/2016.

Unless otherwise stated, this privacy policy applies exclusively to this application/website.

23 September 2018