

## **WEBSITE PRIVACY POLICY - v.1.0**

**(pursuant to art.13 of EU Regulation no. 2016/679)**

Pursuant to Regulation (EU) 2016/679, this page describes the methods for processing the personal data of users consulting the website of Società Cooperativa Agricola Cantina Sociale Tollo, accessible telematically at the following link: <https://www.cantinatollo.it/>

This information does not concern other sites, pages or online services that can be reached through hypertext links that may be published on the site but which refer to resources outside the domain <https://www.cantinatollo.it/>

### **1. DATA CONTROLLER**

The Data Controller is Società Cooperativa Agricola Cantina Sociale Tollo in the person of its legal representative pro-tempore with registered office in Via Garibaldi n. 68 - 66010 - Tollo (CH), - P.iva 00090180696, e-mail [info@cantinatollo.it](mailto:info@cantinatollo.it)

### **2. THE PERSONAL DATA PROTECTION RESPONSIBLE**

The Società Cooperativa Agricola Cantina Sociale Tollo has designated the company Zenko S.r.l. with registered office in Pineto (TE), Via dell'Industria, snc, e-mail: [dpo@zenko.it](mailto:dpo@zenko.it) as the Data Protection Manager.

### **3. TYPES OF DATA PROCESSED AND PURPOSES OF DATA PROCESSING**

#### **Browsing data**

The computer systems and software procedures used to operate a website acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols. This category includes, for example: the domain names of the computers and terminals used by users, the URI/URL notation addresses of the resources requested, the date and 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 given by the server (successful, error, etc.) and other parameters relating to the user's operating system and computer environment. This information is not collected in order to be associated with identified interested parties, but by its very nature could, through processing and association with data held by the Data Controller or by third parties, make it possible to identify the users of the site. Please note that the <https://www.cantinatollo.it/> website acquires the following data from users accessing the web portal, such as: IP addresses, domain names of the computers and terminals used by users, URI/URL (Uniform Resource Identifier/Locator) notation addresses of the resources requested, 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 given by the server (successful, error, etc.), and other parameters relating to the user's operating system and IT environment.

Therefore, these data are, as a rule, used for the sole purpose of obtaining statistical information on the use of the site and to check the proper functioning of the website itself. It should be noted that the aforesaid data could be used to ascertain responsibility in the event of computer crimes to the detriment of the Owner's site or any other sites connected or linked to it.

The data collected are processed exclusively for aggregate and anonymous statistical purposes relating to the use of the website, in order to improve its performance, content and usability by users. In particular, the processing is aimed at analysing metrics such as the number of visitors, the most consulted pages, the time spent on the site, the geographical origin of accesses and the correct functioning of the web pages.

#### **Data communicated by the user**

The optional, explicit and voluntary sending of messages to the contact addresses of the Società Cooperativa Agricola Cantina Sociale Tollo, private messages sent by users to the institutional profiles/pages on social media (where this possibility is envisaged), as well as the completion of the forms present on the website <https://www.cantinatollo.it/>, entail the acquisition of the sender's contact data, necessary for replying, as well as all the personal data included in the communications. Specific

information will be published at the bottom of each contact form.

Cookies and other tracking systems

Please refer to the cookie policy available at the following link

<https://www.iubenda.com/privacy-policy/61181746/cookie-policy>

#### **4. LEGAL BASIS OF THE PROCESSING**

The legal basis of the processing of browsing data is represented both by the consent, implicitly given by the user at the time he/she voluntarily and optionally decides to browse the website

<https://www.cantinatollo.it/>, (where technically possible, consent may be revoked at any time, without prejudice to the lawfulness of the processing based on the consent given prior to revocation), and by the website owner's overriding legitimate interest, represented by the need for the Società Cooperativa Agricola Cantina Sociale Tollo to verify the proper functioning of the website and to intervene for any maintenance activities, as well as for ascertaining responsibility in the event of computer crimes to the detriment of the Owner's website or other sites connected or linked to it.

#### **5. NATURE OF DATA COLLECTION**

When browsing the website <https://www.cantinatollo.it/>, the site automatically acquires the browsing data necessary to ensure the use of the site.

#### **6. METHOD OF PROCESSING**

Processing is carried out in compliance with fundamental rights and freedoms and is based on the principles of correctness, lawfulness, transparency and protection of confidentiality and is carried out with the aid of electronic instruments.

#### **7. COMMUNICATION OF PERSONAL DATA**

Without prejudice to communications made in fulfilment of legal obligations or requests by the Authorities and contracts with public bodies and subjects, your personal data are processed by internal staff previously authorised and designated as data processors, who are given appropriate instructions regarding measures, expedients, modus operandi, all aimed at the concrete protection of your personal data.

The Società Cooperativa Agricola Cantina Sociale Tollo may also avail itself of the services of third parties for the performance of activities and the related processing of personal data owned by the Company, such as for example

- internet service providers, website developers and IT service providers;
- external consultants or freelance professionals, such as trusted lawyers, etc.

In accordance with the provisions of the law, these subjects shall ensure levels of experience, capacity and reliability such as to guarantee compliance with the current provisions on processing, including the profile of data security. These third parties, where appropriate, are designated "data processors" and are periodically audited in order to ascertain that the levels of assurance recorded at the time of the initial assignment are maintained. A list of the appointed controllers is available from the Data Controller.

#### **8. TRANSFER OUTSIDE THE EUROPEAN COMMUNITY**

The Personal Data of the Data Subjects will not be transferred to countries outside the European Community.

#### **9. DATA STORAGE TIME**

Browsing data are stored for a maximum, as a rule, of 13 months to allow the Società Cooperativa Agricola Cantina Sociale Tollo to check that the website is working properly and for the relevant maintenance activity.

The conservation of the aforementioned data for a longer period of time could occur only for any need to ascertain responsibility and/or offences by the Data Controller and the Judicial Authorities or to fulfil legal obligations that legitimise their conservation.

## **10. RIGHTS OF INTERESTED PARTIES**

Interested parties may exercise their rights as provided for in Article 15 et seq. of EU Regulation 2016/679 and in particular the right to access their personal data, to request their rectification or restriction, their updating if incomplete or erroneous and their deletion if the conditions are met, as well as to oppose their processing.

In order to facilitate the exercise of the aforementioned rights, you may forward to the Data Controller the 'exercise of personal data protection rights' form, published on the Privacy Guarantor's portal <http://www.garanteprivacy.it>, duly completed.

Lastly, we inform you that if you consider that the processing of personal data relating to you is in breach of the provisions of EU Regulation 2016/679 (Art. 77), you have the right to lodge a complaint with the Garante, ([www.garanteprivacy.it](http://www.garanteprivacy.it)) or to take legal action.

## **11. HOW TO EXERCISE RIGHTS**

You may exercise your rights at any time by sending:

- a registered letter with return receipt to Società Cooperativa Agricola Cantina Sociale Tollo, at the address Via Garibaldi n. 68 - 66010
- Tollo (CH);
- an email to the address [info@cantinatollo.it](mailto:info@cantinatollo.it)

Or you may contact the RDP (Data Protection Officer) or DPO of the Company directly at the email address [dpo@zenko.it](mailto:dpo@zenko.it).

## **12. MODIFICATIONS AND UPDATES**

This policy is valid from the date on which it was presented. However, the Controller may, with prior notice, make changes and/or additions to this policy, also as a consequence of any subsequent regulatory changes and/or additions.