

 Gruppo d'Amico d'Amico Group	Privacy statement and cookie policy for the users of the website www.damicofratelli.it Articles 13 and 14 of Regulation 2016/679/EU (hereinafter also "GDPR")	ID Code	PRIV 07 ENG
		Rev. Nr.	1
		Rev. Date	24/07/2023

**Gruppo d'Amico
d'Amico Group**
Via di Santa Teresa, 35
00198 – Roma – Italia
www.damicofratelli.it

Group Companies are available at the link:
<https://www.damicofratelli.it/Pdf/dAmicoGroupCompanies.pdf>
 or by scanning the QR code:



Purpose of this notice

The "d'Amico Group" (hereinafter also only "Group" or "Controller") consists of the companies available at the following link: <https://www.damicofratelli.it/Pdf/dAmicoGroupCompanies.pdf>.

The Group is committed to respecting and protecting your privacy and wants you to feel safe either during the simple browsing of the site or in case you decide to register, providing us with your personal data to use the services made available to its Users and / or Customers. On this page the Group intends to provide some information regarding the processing of personal data relating to users who visit or consult the website accessible by electronic means from the address www.damicofratelli.it.

The information is provided only for the Group's website and not for other websites that may be consulted by the user through links (for which reference is made to the respective privacy policies).

Reproduction or use of pages, materials and information contained within the Site, by any means and on any medium, is not permitted without the prior written consent of the Group. Copying and / or printing is allowed for personal and non-commercial use only (for inquiries and clarifications please contact the data controller at the addresses indicated below). Other uses of the content, services and information on this site are not permitted.

With regard to the content offered and the information provided, the Group will make sure that the contents of the Website are kept up-to-date and revised, without offering any guarantee as to the adequacy, accuracy or completeness of the information provided, explicitly deciding any responsibility for errors in omission in the information provided on the Website.

Origin - Navigation Data

The Group informs that the personal data you have provided and acquired together with the request for information and / or contact, registration on the site and use of the services via smartphone or any other device used to access the Internet, as well as the data necessary for the provision of these services, including navigation data and data used for the possible purchase of the services offered by the Group but also only the so-called data "navigation" of the site by Users, will be processed in compliance with applicable law. The computer systems and software procedures used for the operation of this website acquire, during their normal operation, some personal data whose transmission is implicit in the use of the Internet. This information is not collected to be associated with identified interested parties but, due to its nature, could, through processing and association with data held by third parties, allow users to be identified. This category of data includes the "IP addresses" or domain names of the computers employed by the users connecting to the site, the addresses in the URI (Uniform Resource Identifier) notation of the requested resources, the time of the request, the method used to submit the request to the web server, the file size obtained in response, the numerical code indicating the response status given by the web server (success, error, etc.) and other parameters related to the operating system and the computer environment of the user. These data are used for the sole purpose of obtaining anonymous statistical information on the use of the site and to check the correct functioning of the Group's website. It should be noted that the aforementioned data could be used to ascertain responsibility in the event of IT crimes affecting the Group's website or to other sites connected or linked to it: except for this eventuality, the data on web contacts do not persist for more than a few days.

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Origin – Data provided by user

The Group collects, stores and processes your personal data for the purpose of providing the services on the site, or for legal obligations. With regard to some specific services, promotions, etc. the Group may process personal data also for commercial purposes. In such cases, a specific, separate, optional and always revocable consent will be required, using the methods and the contact details indicated below.

The optional, explicit and voluntary sending of emails to the addresses indicated in the appropriate section of the Website, as well as the filling of questionnaires (e.g. Module), communication via chat, push notification via APP, social networks, call centers, etc., implies the acquisition of some of your personal data, including those collected through the use of The APP and correlated services, needed in order to answer the inquiries. We also point out that when using the mobile connection to access digital content and services offered directly by the Group or by our Partners, it may be necessary to transfer your personal data to such third parties. We point out that you could access the site or connect to areas where you could be enabled to publish blog or bulletin information, communicate with others, for example, coming from the Company page on Facebook®, LinkedIn®, YouTube®, and other social networking sites, review products and offers and post comments or content. Before interacting with these areas, we invite you to read carefully the General Conditions of Use, taking into consideration that under these circumstances, the information published can be viewed by anyone with access to the Internet and all the information included in these publications can be read, collected and used by third parties.

Purpose of the processing and legal basis

Data is processed for the following purposes:

- 1) strictly connected and necessary for the registration on www.damicofratelli.it, services and / or Apps developed or made available by the Group, the use of the related information services, the management of contact requests or information;
- 2) related to the fulfillment of obligations under EU and national regulations, the protection of public order, the detection and repression of crimes;
- 3) direct marketing, i.e. sending advertising material, carrying out market research or commercial communication of the services offered by the Group;
- 4) obtaining statistical information on the use of services (most visited pages, number of visitors per hour or day, geographical areas of origin, etc.);
- 5) check the correct functioning of the services offered.

The provision of data for the purposes referred to in points 1), 2) functional to a user request or required by a specific regulatory provision, is mandatory and, failing that, it will not be possible to receive the information and access the services requested ; with regard to points 3), 4) and 5), the consent to the processing of data by the user is instead free and voluntary and always revocable without consequences on the usability of the products and services except for the impossibility for the group to keep the user updated on new initiatives or special promotions or advantages available to users. The Group may send commercial communications relating to products and / or services similar to those already provided, pursuant to Directive 2002/58 / EU, using e-mail coordinates, or paper ones, indicated by you on such occasions to which you may object with the methods and the contact details below.

Methods, treatment logics, storage times and security measures

The processing is also performed with the aid of electronic or automated means and is performed by the Group and / or by third parties which the Group may use to store, manage and transmit the data. The processing of data will be carried out with the logic of organization and elaboration of your personal data, including the logs originating from access and use of services made available via the web, products and services related to the purposes mentioned above

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and, however, so to guarantee the security and confidentiality of data. The personal data processed will be kept for the time required by the legislation in the applicable time. With regard to data security, in the sections of the website set up for particular services, where personal data are requested from the user, the data is encrypted using a security technology called Secure Sockets Layer, abbreviated to SSL. The SSL technology encrypts the information before it is exchanged via the Internet between the user's computer and the central systems of the Group, making them incomprehensible to unauthorized parties and thus guaranteeing the confidentiality of the transmitted information; the Group retains only the minimum set of information necessary to manage any disputes, and generally for no more than three months. Precisely with reference to the personal data protection aspects, the user is invited, pursuant to art. 33 of the GDPR to report to the Company any circumstances or events from which a potential "breach of personal data (data breach)" may occur in order to allow an immediate evaluation and the adoption of any actions aimed at combating such event by sending a communication to privacyprotection@damicofratelli.it or by contacting the Data Controller or the Data Processor. The measures adopted by the Group do not exempt the user from paying the necessary attention to the use, where required, of a password / PIN of adequate complexity, which will have to be updated periodically, especially if he thinks they have been violated / known by third parties, as well as making it inaccessible to third parties, in order to avoid improper and unauthorized use.

Cookies

A cookie is a short string of text that is sent to your browser and possibly saved on your computer (alternatively on your smartphone / tablet or any other device used to access the Internet); this submission usually occurs every time you visit a website. The Group uses cookies for different purposes, in order to offer you a fast and secure digital experience, for example, allowing you to keep the connection to the protected area active while browsing through the pages of the site.

The categories of operating cookies include:

TECHNICAL AND FUNCTIONAL COOKIES. Technical cookies are used by the Group to store the user's session and to perform other activities that are strictly necessary for its operation, for example in relation to the distribution of traffic. These cookies are installed directly by the Group without the prior consent of the user. The user must be aware that the refusal of technical and functional cookies could lead to a reduction in the level of functionality of the Website.

THIRD PARTY COOKIES. While browsing the Website users may receive third-party cookies, i.e. cookies of sites, social networks and external platforms of third-party companies also used for advertising purposes. If the user chooses to receive cookies from third parties, the communications sent by them in the future will be more inherent to the user's interests. The following are the third-party cookies and links to express your consent to the installation. If you do not make any choice and decide to continue with the navigation within the Site, you will consent to the use of cookies.

GOOGLE ANALYTICS. Google Analytics is a web analytics service provided by Google Inc. ("Google"). Google uses the Personal Data collected for the purpose of tracking and examining the use of this online space, compiling reports and sharing them with other services developed by Google. Anonymization of the IP address is envisaged in order not to make it possible to re-identify the user. Personal data collected: different types of personal data, including usage data, as specified in the privacy policy of Google. Place of processing: USA - privacy policy: <https://policies.google.com/privacy?hl=it>.

HOW TO MANAGE COOKIES INSTALLATION. In addition to what is indicated in this document, the user can manage preferences related to cookies directly within his browser and prevent – for example – that third parties can install them. Through the preferences of the browser it is also possible to delete the cookies installed in the past, including the Cookie in which the consent to the installation of Cookies by this Site is eventually saved. It is important to note that disabling all Cookies, the functioning of this Website could be compromised. The user can find information on how to manage cookies in his browser at the following addresses:

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Google Chrome	https://support.google.com/chrome/answer/95647?hl=en&p=cpn_cookies
Mozilla Firefox	https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences
Safari	https://support.apple.com/en-us/HT201265
Internet Explorer / Edge	http://windows.microsoft.com/en-us/windows-vista/block-or-allow-cookies

Cookies stored on your terminal can not be used to retrieve any data from your hard disk, transmit computer viruses or identify and use your e-mail address. Each cookie is unique in relation to the browser and device used by you to access the Website or using the company Apps. In general, the purpose of cookies is to improve the functioning of the website and the user's experience in using it, even if cookies can be used to send advertising messages (as specified below). For more information on what cookies are and how they work, you can consult the "All about cookies" website: <http://www.allaboutcookies.org>.

HOW CAN I DISABLE COOKIES? All browsers allow you to delete cookies from your computer's hard drive, to receive an alert when they are saved or to disable them altogether. To know how to do this, you can consult the instructions or the help screen of your browser. To revoke the consent it is also possible to refer to the websites of the third parties accessible through the following link: <http://www.allaboutcookies.org/manage-cookies/index.html>.

Areas of communication and data transfer.

For the pursuit of the aforementioned purposes, the Group will communicate and have the personal data of the users / customers dealt with third parties with whom we have relationships, in Italy and abroad, where these third parties provide services at our request. We will provide these third parties with only the information necessary to perform the services required, taking all required measures to protect your personal data. The data might be transferred outside the European Economic Area if this is necessary for the management of your contractual relationship. In this case, protection obligations equivalent to those guaranteed by the Controller will be imposed on the recipients of the data. In the case of use of services offered directly by Partners we will provide only the data strictly necessary for their execution. In any case, only the data necessary for the achievement of the intended purposes will be communicated and, where required, the guarantees applicable to transfers of data to third countries will be applied. We may also disclose personal data to our commercial service providers, for marketing reasons, appointed for this purpose by external processors. In addition, personal data may be disclosed to the competent public bodies and authorities for compliance with regulatory requirements or for the assessment of responsibility in the case of computer crimes to the detriment of the site as well as communicated to, or allocated to, third parties (as responsible or, in the case of providers of electronic communication services, autonomous owners), providing computerized and telematic services (eg: hosting, management and development of websites) and of which the Group makes use of for the performance of tasks and activities of a technical and organizational nature that are instrumental to the operation of the website. The subjects belonging to the above mentioned categories operate as separate Data Controllers or as Managers appointed by the Companies of the Group.

Personal data may also be known by Group employees / consultants who are specifically trained and appointed as Data Processors.

The categories of recipients to whom the data may be communicated are available by contacting the Group at the addresses indicated below.

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Rights of the interested parties

You will be able to exercise at any time the rights that are recognized by law, including that:

- to access your personal data, obtaining evidence of the purposes pursued by the Group or the Controller, the categories of data involved, the recipients to whom they may be communicated, the applicable retention period, the existence of decision-making automated processes;
- to obtain without delay the correction of inaccurate personal data concerning you;
- to obtain, in the specific cases, the deletion of your data;
- to obtain the limitation of the treatment or to oppose it, whenever possible;
- to request the portability of the data that you have provided to the Group, i.e. to receive them in a structured format, of common use and readable by automatic devices, also to transmit this data to another holder, within limits and with restrictions provided for by art. 20 of the GDPR;

furthermore, you may propose a claim to the Guarantor for the Protection of Personal Data pursuant to art. 77 of the GDPR.

For the treatments referred to in point 4) of the purposes, the user can always revoke the consent and exercise the right to oppose direct marketing (in "traditional" and "automated" form). The opposition, in the absence of a contrary indication, will be referred to both traditional and automated communications.

Treatment Controller

The controller, pursuant to art. 4 of the GDPR, is the company

Fratelli d'Amico Armatori S.p.A. – P.IVA / VAT NUMBER: 00965971005 – CF / FISCAL CODE: 01140130582, WITH REGISTERED OFFICE IN ROME, VIA DI SANTA TERESA N. 35.

Responsible for the treatment is Mr. **Vincenzo Minieri**, identified on the Fratelli d'Amico wages book (*libro unico sezione retributiva*) with serial number 083.

The above rights can be exercised at the request of the interested party in the manner disclosed on the Group's website using the following references:

- Vincenzo Minieri (V.Minieri@damicofratelli.it) or
- privacy@damicofratelli.it.

The use of the Website, including versions intended for tablets and / or smartphones, by the User implies full knowledge and acceptance of the content and any indications included in this version of information published by the Group when the site is accessed. The Group informs that this privacy information might be changed without notice and therefore recommends a periodic reading.

The Data Controller

Fratelli d'Amico Armatori S.p.A.