## **Privacy Policy**

This privacy policy aims to provide all the information regarding the processing of personal data carried out by Parma Alimentare S.r.l. when the user browses the website or contact the company (as better specified below).

## 1. INTRODUCTION - WHO ARE WE?

Parma Alimentare S.r.l., with registered offices in Via Verdi 2, 43123 – Parma, Italy, Tax Code/VAT No. 00407390343, enrolled in the Company Register of Parma with the No. 128080 (hereinafter the "Controller"), owner of the website <a href="www.parmafoodvalley.net">www.parmafoodvalley.net</a> (hereinafter the "Website"), as the controller of personal data of the users who browse on the Website and that contact the Controller with the modalities explained on the Website (hereinafter the "Users") provides the following privacy policy according to Article 13 of EU Regulation 2016/679 dated 27 April 2016 (hereinafter, "Regulation" or "Applicable Law").

## 2. HOW TO CONTACT US?

The Controller takes the utmost account of its Users' right to privacy and protection of personal data. For any information related to this privacy policy, Users may **contact the Controller** at any time, using the following methods:

- Sending a registered letter with return receipt to the registered offices of the Controller (Via Verdi 2, 43123 Parma, Italy);
- Sending an electronic mail message to the address: <u>admin@parmafoodvallev.net</u>.

The Controller did not appoint a Data Protection Officer (DPO), because the Controller is not subject to the mandatory obligation to appoint it pursuant to art. 37 of the Regulation.

# 3. WHAT DO WE DO? - PROCESSING PURPOSES

By navigating the Website, the User can be kept up to date on the activities developed by the Controller (hereinafter, the "Service"). In connection with the activities that may be carried out through the Website, the Controller collects personal data relating to the Users.

This Website and any services offered through the Website are reserved for individuals who are 18 years and over. Therefore, the Controller does not collect personal data relating to individuals under 18 years of age. Upon request of the Users, the Controller will promptly delete all personal data that has been involuntarily collected and related to subjects under the age of 18.

The personal data of the Users will be processed lawfully by the Controller for the following processing purposes:

- a) supply of the Service: to allow surfing of the Website by the User. The User's data collected by the Controller to this end include all personal data whose transmission is implicit in the use of Internet communication protocols, that the computer systems and software procedures used to operate the Website acquire during their normal functioning: the IP addresses or domain names of the computers used by the Users, the addresses in URI notation (Uniform Resource Identifier) of the requested resources, the time of the request, the method used in submitting the request to the server, the file size obtained in response, the numerical code indicating the status of the response given by the server (good order, error, etc.) and other parameters relating to the operating system and the User's IT environment. These data are used for the sole purpose of obtaining anonymous statistical information on the use of the Website and to allow its correct operation. Without prejudice to what is stipulated elsewhere in this privacy policy, under no circumstances the Controller will make the personal data accessible to other Users and/or third parties;
- b) <u>legal obligations</u>, or to fulfil obligations provided by the law, an authority, a regulation or European legislation;

c) executing the User's contact request: if the User contacts the Controller with the modalities explained on the Website, the personal data of the Users will be processed by the Controller with the only purpose to reply to his/her request. If the User sends an e-mail to the Controller, the Controller will process the e-mail address, as well as any other information relating to the User voluntary given by the User to the Controller, in order to be able to reply to the User's request. No other processing will be carried out by the Controller in relation to the Users' personal data. Without prejudice to what is stipulated elsewhere, under no circumstances the Controller will make the personal data accessible to other Users and/or third parties.

The provision of personal data for the processing purposes indicated above is optional but necessary, since failure to provide such data will make it impossible for the User to access the Website and to use the Service.

#### 4. LEGAL BASIS

<u>Supply of the Service</u> (as described in paragraph 3, letter a) above): the legal basis is Article 6, paragraph 1, letter b) of the Regulation, since the processing is necessary for the performance of a contract to which the User is party or in order to take steps at the request of the User prior to entering into a contract.

<u>Legal obligations</u> (as described in paragraph 3, letter b) above): the legal basis is Article 6, paragraph 1, letter c) of the Regulation, since the processing is necessary for compliance with a legal obligation to which the controller is subject.

<u>Processing the User's contact request</u> (as described in the previous paragraph 3, letter c) above): the legal basis consists of art. 6, paragraph 1, lett. b) of the Regulation, since the processing is necessary for the performance of a contract to which the User is party or in order to take steps at the request of the User prior to entering into a contract.

#### 5. PROCESSING METHODS AND DATA RETENTION PERIOD

The Controller will process the personal data of Users using manual and IT tools, with logic strictly related to the purposes themselves and, in any case, in order to guarantee the security and confidentiality of the data.

The personal data of the Users will be retained for the time strictly necessary to carry out the main purposes explained in paragraph 3 above or, in any case, as necessary for the protection in civil law of the interests of both the Users and the Controller.

## 6. TRANSMISSION AND DISSEMINATION OF DATA

The User's personal data may be transferred outside the European Union and, in this case, the Controller will ensure that the transfer is carried out in accordance with the Applicable Law and, in particular, in accordance with Articles 45 (Transfer on the basis of an adequacy decision) and 46 (Transfer subject to appropriate safeguards) of the Regulation.

The employees and/or collaborators of the Controller who are in charge of carrying out Website maintenance may become aware of the personal data of the Users. These subjects, who have been instructed by the Controller accordingly to article 29 of the Regulation, will process the User's data exclusively for the purposes indicated in this policy and in compliance with the provisions of the Applicable Law.

The personal data of the Users may also be disclosed to third parties who may process personal data on behalf of the Controller as "**Data Processors**", such as, for example, IT and logistic service providers

functional to the operation of the Website, outsourcing or cloud computing service providers, professionals and consultants.

Users have the right to obtain a list of any data processors appointed by the Controller, making a request to the Controller in the manner indicated in paragraph 7 below.

## 7. RIGHTS OF THE DATA SUBJECTS

Users may exercise their rights granted by the Applicable Law by contacting the Controller as follows:

- Sending a registered letter with return receipt to the registered offices of the Controller (Via Verdi 2, 43123 – Parma, Italy);
- Sending an electronic mail message to the address: admin@parmafoodvallev.net.

The Controller did not appoint a Data Protection Officer (DPO), because the Controller is not subject to the mandatory obligation to appoint it pursuant to art. 37 of the Regulation.

Pursuant to Applicable Law, the Controller informs that Users have the right to obtain indication (i) of the origin of personal data; (ii) the purposes and methods of the processing; (iii) the logic applied in the event of processing carried out with the aid of electronic instruments; (iv) of the identification details of the data controller and processors; (v) the subjects or categories of subjects to whom the personal data may be communicated or who may come to aware of them as processors or agents.

Furthermore, Users have the right to obtain:

- a) access, updating, rectification, or, when interested, integration of data;
- b) the cancellation, transformation into anonymous form or the restriction of data processed in breach of the law, including data that does not need to be stored in relation to the purposes for which the data was collected or subsequently processed;
- c) certification to the effect that notification has been supplied of operations as per letters a) and b), as also regards their content, to those to whom the data was communicated or disseminated, except for the case where notification proves impossible or requires the use of means clearly disproportionate to the right being protected.

Moreover, the Users have:

- a) the right to **revoke consent** at any time, if the processing is based on their consent;
- b) (where applicable) the right to **data portability** (the right to receive all personal data concerning them in a structured format, commonly used and readable by automatic device);
- c) the **right to oppose to**:
  - i) in whole or part, for legitimate reasons, the processing of personal data relating to him/her for legitimate reasons even pertinent to the purpose of collection;
  - ii) in whole or part, the handling of personal data for the purpose of sending advertising or sales materials or for the carrying out of market research or for commercial communication purposes;
  - iii) if personal data is processed for direct marketing purposes, at any time, to the processing of data for this purpose, including profiling to the extent that it is related to such direct marketing.
- d) if it is deemed that the processing concerning his/her personal data violates the Regulation, the right to **lodge a complaint with a Supervisory authority** (in the Member State in which he/she usually resides, in the one in which he/she works or in the one in which the alleged violation has occurred). The Italian Supervisory Authority is the **Data Protection Authority**, with registered offices in Piazza Venezia No. 11, 00187 Rome (http://www.garanteprivacy.it/).

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The Controller is not responsible for updating all links viewed in this Privacy Policy, therefore, whenever a link does not work and/or is not updated, the Users acknowledge and accept that they must always refer to the document and/or section of the websites referred to by this link.