

"PRIVACY & COOKIES POLICY" OF THE WEBSITE: www.farpro.it Information provided by Far Pro Modena S.p.A. pursuant to Article 13 of EU Reg. 2016/679

1. INTRODUCTION

In compliance with EU Reg. 2016/679, we are pleased to provide you with the necessary information regarding the purposes of and methods by which we process the personal data of those who browse the pages of the website www.farpro.it, owned by the company **Far Pro Modena S.p.A. based in Spilamberto (MO) at Via Ghiarole, n. 72**, whose role in this process is the data controller.

This information applies to this website (www.farpro.it) only and does not apply to other websites which may be accessed via links contained in this site; the data controller cannot be held in any way liable or responsible for the content of such third-party websites.

Users are informed that this website is hosted by the company SEEWEB S.r.l., with registered premises at Corso Lazio, n. 9/a, Frosinone, 03100, with tax ID number: 02043220603 and that the servers of said company which host the website are located in Italy.

2. TYPES OF DATA PROCESSED

Navigation data

As far as the technical aspects and protocols are concerned, you are informed that:

- The computer systems and software procedures used for operation of this website may acquire, as a matter of course, certain items of personal data, whose transmission is required as part of Internet communication protocols.
- This information is not collected in order to be associated with identified data subjects; however, the nature of this information is such that it could - through processing and association with data held by third parties - lead to users being identified.
- This category of data includes the IP addresses or the domain names of the computers used by users connecting to the site, the Uniform Resource Identifier (URI) addresses of the resources requested, the time of the request, the method used when submitting the request to the server, the size of the file obtained in response, the numerical code showing the status of the response given by the server (successful, error), and other parameters relating to the operating system and the user's computer environment.
- This kinds of data may be used to ascertain liability in the event of computer crimes against the site.

Cookies

Cookies are small text files that are sent by the website visited via the User's device to (usually) the browser, where they are stored so that the device is recognised the next time the user visits the site. Each time the users goes back to the site, then, the cookies are sent back to the site by the user's device.

Each cookie generally contains: the name of the server from which the cookie was sent, the expiry date, and a number (usually a unique number generated randomly by the computer). The website server that transfers the cookie uses this number to recognise the user when they return to visit the site or browse its pages.

Cookies may be set not only by the provider of the site visited by the user (first-party cookies), but also by other sites, which install them via the first site (third-party cookies) and are subsequently able to recognise them. This happens because there may be content (images, maps, sounds, links to web pages of other domains, etc) on the site visited that resides on servers other than those hosting the site visited.

Generally speaking, cookies are classified into different types according to:

- A. Their duration:
 - session cookies (i.e. temporary cookies) are automatically deleted when the browser is closed.
 - persistent cookies are active until their expiry date or until they are deleted by the user.
- B. Their origin:
 - first-party cookies are sent to the browser directly by the site you are visiting.
 - third-party cookies are sent to the browser by other sites, i.e. not the site you are visiting.
- C. Their purpose
 - technical cookies
 - certain cookies, namely navigation / indispensable / performance / process / security cookies, contribute to site operation, for example, they allow users to browse the pages or access protected areas. If these cookies are blocked, the site cannot function properly.
 - certain cookies, namely functionality / preference / location / session status cookies, store information that changes the behaviour or appearance of the site (preferred language, copy and font size, the geographical area in which you are located). If these are blocked, the experience is less functional but not compromised.
 - statistical/analytic cookies, which may be either a) first-party or b) third-party cookies, with IP masking and without cross-referencing the data (for the same purpose as technical cookies), are used to collect information and generate statistics on website use in order to understand how visitors interact.
 - non-technical cookies
 - third-party statistical/analytic cookies without IP masking and with data cross-referencing, are used to collect information and generate usage statistics and their use may involve identifying and tracking website users in order to understand how visitors interact.
 - profiling / advertising / advertising / tracking or conversion cookies are used to select the most appropriate advertisements for the user (personalised advertising). Profiling cookies are designed to create a profile of a

user, which is then drawn on in order to deliver advertising messages which are consistent with the preferences expressed by the user in question while browsing the Net.

Far Pro Modena S.p.A. has implemented the procedures required by the Data Protection Authority Provisions on the preparation of simplified procedures for the information notice and the acquisition of consent for cookie use - dated 8 May 2014 (**Individuazione delle modalità semplificate per l'informativa e l'acquisizione del consenso per l'uso dei cookie - 8 maggio 2014** - published in the Italian Official Gazette No. 126 dated 3 June 2014), as well as subsequent measures issued by the Authority on "cookies".

The following section provides all the necessary information on cookies set via this site, together with instructions on how to manage users' preferences regarding cookies.

Far Pro Modena S.p.A. wishes to inform users that its website (www.farpro.it) may use the following kinds of cookies:

- First-Party Technical Cookies, which do not require the user's consent;
- Third-Party Analytical Cookies, which are similar to technical cookies in that tools have been adopted to reduce the identifying power of the cookies used (by masking significant portions of the IP address) and the third party does not cross-reference the information collected with other information already available.
- Profiling cookies.

More specifically and in addition to the above, we would like to highlight the fact that the Farpro website (www.farpro.it) uses:

- **First-party technical cookies**

These cookies are necessary to ensure proper website operation: they are used either for browsing or to provide a service requested by the user; they are not used for any further purposes and are set directly by the data controller. Without these cookies, certain operations cannot be performed or can be performed but are more complex and/or less secure. The following section provides a brief description of each one of the cookies of this kind used by our website:

Name	Function	Duration
wfwaf-authcookie-438b00a164d7f36c5772d6def2e8fb00	Cookie setting management	12 hours

- **Third-party analytical cookies, which are similar to technical cookies.**

Our website uses third-party cookies for managing statistics. More specifically, our website uses Google Analytics: this is a web analytics service provided by Google Inc. ("Google") which uses cookies stored on the user's computer to perform aggregate statistical analyses relating to use of the website visited. You are advised that tools have been adopted to reduce the identifying power of the cookies used (by masking significant portions of the IP address) and the third party does not cross-reference the information collected with other information already available. For these cookies, the chart below provides the name of the third parties that manage them and the link to a page where the user can find information on how their data is processed and they can consent to the processing. The following section provides a brief description of each one of the cookies of this kind used by our website:

Name	Function	Duration	Third party	Link to the privacy notice provided as part of the third-party's policy	Opt Out
_ga	Google analytics profiling	2 years	Google	<ul style="list-style-type: none"> • https://policies.google.com/?hl=en 	
_gid	Google analytics profiling	24 hours			

- **Profiling cookies**

Lastly, users are informed that the website uses solely third-party profiling cookies. Profiling cookies are designed to create a profile of a user, which is then drawn on in order to deliver advertising messages which are consistent with the preferences expressed by the user in question while browsing the Net. The following chart provides a list of the profiling cookies set by third parties which are currently used by the website, specifying the name, the function performed by each one thereof, and their duration:

Name	Function	Duration	Third party	Link to the privacy notice provided as part of the third-party's policy	Opt Out
.....		•	

- **Social network buttons**

Social buttons are the buttons found in the site showing the icons of various social media sites (e.g. Facebook, Twitter, etc ...) which allow users browsing the site to interact with these social media platforms by simply clicking on the button. The social buttons used by the Farpro site (<http://www.farpro.it>) are links that take the user to the data controller's

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account on the social networks shown. Therefore, no third-party cookies are set through the use of these buttons in our site. Listed below, however, are the social network buttons used by the site (<http://www.farpro.it>) and the links available to users to view the privacy policy regarding management of the data by the social networks to which the buttons refer.

Share button (Facebook Ireland Ltd)

This button provides an interactive service with **Facebook Ireland Ltd.**, provided by **Facebook Ireland Ltd.**

Place of processing: **Facebook Ireland Ltd.**

Privacy Policy: <https://www.facebook.com/privacy/explanation>

Share button (Twitter, Inc.)

This button provides an interactive service with **Twitter Inc.** provided by **Twitter Inc.**

Place of processing: **Twitter, Inc.**

Privacy Policy: <https://twitter.com/it/privacy>

Share button (LinkedIn Corporation)

This button provides an interactive service with **LinkedIn Corporation**, provided by **LinkedIn Corporation**

Place of processing: **LinkedIn Corporation**

Privacy Policy: https://www.linkedin.com/legal/privacy-policy?_l=it_IT

In general, apart from the type of cookies used by this website, we wish to inform users that, in addition to the safeguards established by laws in force, there are various options available to users which allow them to browse without cookies, such as:

- Blocking third-party cookies: third-party cookies are not generally required for browsing, which means users can block or disable them by default, using the appropriate functions in their browsers.
- Enabling the *Do Not Track* option: the *Do Not Track* option is available in the majority of the most recent browsers. When enabled, websites designed to comply with this option should automatically stop collecting certain items of browsing data. As already mentioned, however, not all websites are set to respect this setting, which is discretionary.
- Activating the private or "incognito" browsing mode: using this feature, you can browse without leaving any trace of your navigation data in the browser. The sites will not remember the user, the pages visited will not be stored in the history, and the new cookies set will be deleted. Nevertheless, this browsing feature does not guarantee anonymity on the Internet because it simply prevents browsing data being stored in the browser, while the same data will still be available to website and connectivity providers.
- Delete cookies directly: there are special settings to enable this option in all browsers. Remember, however, that every time you connect to the Internet, new cookies are downloaded, so the deletion operation should be carried out on a regular basis.

If you have any further questions concerning cookies, please see the information available via the following link:

<http://www.garanteprivacy.it/cookie>

What is more, if you wish to find out how to limit, block and/or remove cookies set on your device, we recommend you visit the following link: <http://www.aboutcookies.org>

As mentioned above, users can also manage their own cookie preferences through their browsers. To find out the type and version of the browser you are using, we recommend you click on the "Help" option at the top of the browser window, from which you can access all the necessary information. If you know the type and version of the browser you are using, simply click on the link below for your browser to access the cookie management page.

- **Microsoft Internet Explorer**
<http://windows.microsoft.com/en-us/windows-vista/block-or-allow-cookies>
- **Google Chrome**
<https://support.google.com/accounts/answer/61416?hl=it>
- **Mozilla Firefox**
<http://support.mozilla.org/en-US/kb/Enabling%20and%20disabling%20cookies>
- **Safari**
<http://www.apple.com/legal/privacy/>

Lastly, further information on how to handle cookies is available from the following websites: <http://www.youronlinechoices.eu>, <http://www.allaboutcookies.org>, <https://tools.google.com/dlpage/gaoptout>, <http://aboutads.info/choices>, <http://www.networkadvertising.org/choices>.

Data provided voluntarily by the user.

After this site has been visited, data relating to identified or identifiable persons may be processed. More specifically, this processing may concern personal data provided freely by users who send their data to the data controller through the contact methods provided on the website (... **specify company website address** ...) such as, company email addresses, and/or by completing and sending specific forms, included in the site, designed for the provision of information. This is because the optional, express, and voluntary sending of emails to addresses found on this site involves the subsequent acquisition of the sender's address (since required in order to reply to requests), as well as any other personal data included in the email. Detailed specific information notices on data processing pursuant to Article 13 of EU Reg. 2016/679, are included, as and when necessary, in the pages featuring forms for gathering visitor data. These information notices are intended to set out the

limits, purposes, and methods applied to the processing of each data form received and each visitor may decide freely whether or not they wish to consent to and authorise the collection and subsequent use of their data.

It should be noted that there is no section of the site, nor any need - in order to access any site feature or function - to provide "special categories of personal data" and/or "personal data relating to criminal convictions and offences", as defined in Articles 9 and 10 of EU Reg. 2016/679; should the user send information of the aforesaid type to the data controller unprompted, the data controller will process such data in compliance with applicable law on the protection of personal data (EU Reg. 2016/679) and within the limits of that which is strictly necessary for the purposes of the requests made by the user in question.

In general, as regards data provided voluntarily by the user, we wish to inform users that EU Reg. 2016/679 and Italian Legislative Decree n. 196/2003 and subsequent amendments and supplements thereto (although solely where compliant with EU Reg. 2016/679) provide for the protection of natural persons in relation to the processing of their personal data. In accordance with such law, your data will be processed on the basis of fairness, lawfulness, and transparency, protecting your confidentiality and your rights.

Pursuant to the aforesaid Article 13 of EU Reg. 2016/679, you are advised as follows:

- a) The data controller may carry out processing using automated means and/or through the collection of paper documents.
- b) users are free to provide information concerning them by sending such data to the data controller via the contact methods on the website (www.farpro.it) and/or by completing the specific forms provided on the site for collecting information; in the latter event, failure to provide certain data could - depending on the specific case - prevent us proceeding with the activities requested by the user (for example, see "compulsory fields" in the information collection forms).
- c) the user's personal data will be processed by persons or entities specifically appointed by the data controller as data processors and/or by anyone acting under the authority thereof and having access to personal data; such persons or entities will process your data only if necessary for the purposes for which it was provided and only to carry out the tasks assigned thereto by the data controller, undertaking to process only the data required to carry out such tasks and to perform only the activities required to carry out the said tasks.

Furthermore, personal data may be disclosed to third parties, although solely if strictly necessary in order to provide specific services or information requested by the user.

Finally, it should be noted that the data controller may use internal or external IT technicians for occasional maintenance, updating, or assistance activities, in the event of website malfunctions. No data originating from the web service will be disclosed or disseminated outside the company.

The data disclosures described above are strictly connected to normal business operations and handling business relationships and such disclosures are strictly necessary for the purposes for which the data in question has been provided;

c1) the data controller may pass on personal data to a third country or an international organisation; in these cases, the data controller undertakes to carry out the processing only in the presence of appropriate guarantees;

c2) in compliance with the "Measures envisaged for data controllers for processing by electronic means relating to the assignment of system administrator tasks" - dated 27 November 2008" (Italian Official Gazette No. 300, dated 24 December 2008) as supplemented and amended, the data controller may appoint specific "**System Administrators**" who, when going about their duties, may access, directly or indirectly, services or systems that process or allow the processing of the personal information.

c3) the data will not be disclosed to other third parties, unless your express consent is sought beforehand.

Your personal data will not be disseminated.

- d) The data will be retained for the time necessary to achieve the purposes for which it was provided; The data will be stored in a form which allows identification of the data subject for no longer than necessary for the purposes for which it was collected or subsequently processed, after which - unless expressly specified otherwise by the data subject - it will be deleted, except in the event of anonymisation.
- e) The personal data you provide will not be processed in order to carry out automated decision-making processes (known as 'profiling').
- f) In the event that the personal data you provide needs to be processed for further purposes other than those stated above, the data controller will provide you with information about the said further, different purposes and any other relevant information.

The data controller has established appropriate technical and organisational measures (taking into account current processing technology and the implementation costs, as well as the nature, scope, context and purpose of the processing both when deciding on the processing means and when carrying out the processing itself, i.e. risk analysis, accountability) in order to effectively implement the data protection principles and integrate the necessary guarantees into the processing in order to meet the requirements of EU Reg. 2016/679 and protect the rights of the data subject.

Data will be processed using methods and instruments that guarantee the security thereof (Article 24, 25 and 32 of the EU Reg. 2016/679) and will be carried out using both automated processes and non-automated methods (paper records), to which suitable technical and organisational measures will be applied in order to guarantee a risk-appropriate level of security, so as to ensure, on a permanent basis, the confidentiality, integrity, and availability thereof, as well as the resilience of the processing systems and services (such as but not limited to: checks on both the assignment of tasks to data processors and the classification of the said data; pseudonymisation and encryption procedures, if sustainable; disaster recovery mechanisms, etc.).

You are advised that the data processing is performed on the basis of the provisions of Article 6, section 1, subsection a) of EU Reg. 2016/679, and users are free to provide their own information by sending it to the data controller via the contact methods provided on the website (www.farpro.it) and/or by completing the specific forms provided on the site for collecting information; in the latter event, failure to provide certain data could - depending on the specific case - prevent us proceeding with the activities requested by the user (for example, see "compulsory fields" in the information collection forms).

The **data controller** is: **Far Pro Modena S.p.A.** with premises located at via Ghiarole, n. 72, in Spilamberto (MO), tax ID number - VAT number: 01643500364 Tel: 059784399, fax: 059783747, email: info@farpro.it, certified email: farpro@pec.it

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Pursuant to Article 28 of EU Reg. 2016/679, the data controller may use third parties to process data on behalf thereof, which or who are formally appointed thereby as data processors. A complete, updated list of the data processors appointed is available from the data controller and may be obtained by simply sending a request to the addresses stated above.

Pursuant to Article 29 of EU Reg. 2016/679, the data controller may use of the services of anyone acting under the authority thereof and/or of the appointed data processor; these persons or entities will be duly trained and informed.

To date, the data controller has not appointed a data protection officer (D.P.O., Article 37 EU Reg. 2016/679 and WP Guidelines, Article 29, 13.12.2016), as this role is deemed unnecessary within the organisation since the processing does not fall within the cases envisaged in the aforesaid Article 37.

The data controller also hereby informs you that:

- g) you, the data subject, are entitled to access your personal data, by request to the data controller, and likewise to request the rectification or erasure of the data and the limitation of the processing concerning your data, and to object to the processing; you are likewise entitled to the portability of your data (Article 15, Article 16, Article 17, Article 18, Article 20, EU REG. 2016/679); upon exercising your right of access, you are entitled to obtain confirmation from the data controller as to whether or not personal data concerning you is being processed, while the exercise of the right to portability allows you (the data subject) to obtain personal data from the data controller in a structured, commonly used, and machine-readable format and request the transfer of the said data from the original data controller to another (cf. WP 242 dated 13.12.2016);
- h) in the event that the processing is based on Article 6, section 1, subsection a, or on Article 9, section 2, subsection a, the data subject is entitled to withdraw consent at any time, without prejudice to the lawfulness of the processing based on the consent given prior to the revocation;
- i) you, the data subject, are entitled to lodge a complaint with a supervisory authority;
- j) you, the data subject, are entitled to be informed by the data controller (which must act in this respect immediately, unless justifiably delayed) of any breach of personal data likely to pose a high risk to your individual rights and freedoms (Article 34, EU REG. 2016/679).

The full wording of the articles of the EU REG. 2016/679 relating to your rights (Articles 15 to 23 inclusive) are available via the following link on the Data Protection Authority website:

- <https://www.garanteprivacy.it/documents/10160/0/Regolamento+UE+2016+679.+Arricchito+con+riferimenti+ai+Considerando+Aggiornato+alle+rettifiche+pubblicate+sulla+Gazzetta+Ufficiale++dell+%27Unione+europea+127+del+23+maggio+2018>

or, alternatively, the data controller will provide you with such information at your request.

3. CHANGES TO THE "PRIVACY & COOKIES POLICY"

The data controller reserves the right to make changes to this Privacy & Cookies Policy, at any time, giving users notice thereof on this page. Therefore, we ask users to visit this page frequently, checking the date on which it was last edited (shown at the bottom) for reference.

In the event of updates or changes to this document, users will be therefore be able to understand and consider the changes made by comparing the different versions of the information provided over time, as the previous versions of the document will still be available for users to access on the website.

In the case of non-acceptance of the changes made to this privacy notice, the user is required to stop using this website and to request that the data controller deletes their personal data by sending a specific message to the data controller, using the contact methods stated above.

Unless otherwise specified, this Privacy & Cookies Policy will continue to apply to the personal data collected up to that moment.

If you have any enquiries, comments, or requests relating to this privacy notice, please contact us using the following contact methods and details:

By email at: info@farpro.it – by fax at: 059783747

In any case, we ask users to report any difficulties encountered in viewing this Privacy & Cookies Policy, so that, if necessary, we can provide alternative means of information provision.

Last revised on 25/05/2018