

DISCLOSURE UNDER ART. 13 OF THE GDPR REGARDING THE PROCESSING OF PERSONAL DATA WEB SITE USERS

CAURUM S.r.l., as Data controller of your personal data, in accordance with and for the purposes of the Regulation EU 2016/679 (hereinafter, the 'GDPR'), hereby informs you that the above-mentioned Regulation provides for the protection of the data subjects with respect to the processing of their data and that such processing will be grounded on fairness, lawfulness, transparency principles and protection of the data subject's confidentiality and rights.

Your personal data will be processed in compliance with the provisions of the GDPR and the confidentiality obligations laid down therein.

1. **Purposes and legal basis for processing:** in particular, your personal data will be used for the following purposes related to the performance of measures connected to contractual and pre-contractual obligations:

- Technical and functional access to the website; no data is kept after closing the Browser;
- Statistical purposes and navigation and users' analysis;
- Reply to a request from the user as in the case of an email sent to the e-mail address available on the website;
- Reply to a request from the user as in the case of completion by the user of the contact form available on the website.

2. **Methods of processing:** Your personal data may be processed as follows:

- By means of electronic equipment using software systems managed by third parties
- By means of electronic equipment using directly managed or programmed software systems
- Temporary processing in an anonymous form

Any processing is made in compliance with the methods described in articles 6 and 32 of the GDPR and adopting the appropriate security measures envisaged.

Your data will be processed solely by - properly instructed - personnel expressly authorised by the Data controller to process data according to their duties.

3. **Communication:** Your data may be communicated to third parties for a proper management of the relationship and, in particular, to the following categories of Recipients including all the duly appointed Data Processors:

- To our advisers in charge of maintaining our website
- Google Analytics

4. **Disclosure:** Your personal data will not be disclosed in any way.

5. **Transfer of data abroad:** in addition, your personal data may be transferred, solely for the purposes mentioned above, to the following Countries:

- EU Countries
- United States of America

6. **Period for which data are stored.** Please note that, in compliance with the lawfulness, purpose limitation and data minimization principles, pursuant to art. 5 of the GDPR, the period for which your personal data will be stored is:

- set for a period of time no longer than is necessary to perform the services requested (e.g. in case of answers to questions made by filling in the contact form or when you contact us to the e-mail addresses available on the website
- regarding Cookies: for the period of time provided for by the cookies themselves;
- erasure of data when closing the browser.

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Cod. Fisc. 02381430517 Partita IVA: IT02381430517

Registro imprese di Arezzo - Siena n. 02381430517 R.E.A. n. AR-206586 - Cap. Soc. € 596.860,00 i.v.

La società è sottoposta all'attività di direzione e coordinamento di Zaira S.r.l. a socio unico ai sensi dell'art. 2497 cod.civ.

7. **Cookie management:** if you have any doubts or concerns about the use of cookies, you can always take action to prevent them from being set and read, for example by changing the privacy settings in your browser to block certain types of cookies.

Since each browser - and often different versions of the same browser - differ from each other, if you prefer to do this yourself via the preferences of your browser, you can find detailed information on the necessary procedure in the help guide of your browser. For an overview of how to do this for the most common browsers, please visit the following website www.cookiepedia.co.uk.

Advertising companies also allow you to opt out of receiving targeted ads if you wish. This does not prevent the setting of cookies, but it does stop the use and collection of certain data by these companies. For more information and opt-out options, please visit the following website www.youronlinechoices.eu

8. **Data controller:** The data controller, pursuant to the Law, is CAURUM S.R.L. Frazione San Zeno Strada A 36 52100 Arezzo (AR), VAT Number 02381430517 Tel 0575 99494 e-mail info@caurum.it, represented by its pro-tempore legal representative.

You have the right to obtain from the Data controller the erasure (right to be forgotten), restriction, updating, rectification, portability, objection to the processing of personal data and, in general, exercise all the rights envisaged in articles 15, 16, 17, 18, 19, 20, 21, 22 of the GDPR.

9. **How to exercise your rights:** you may at any time exercise your rights by contacting the Data Controller directly by sending a registered letter with return receipt to the office of the Data Controller indicated above or by sending an e-mail to the above e-mail address.

10. Rights of the Data subject. EU Regulation 2016/679: Articles 15, 16, 17, 18, 19, 20, 21, 22

1. The data subject has the right to obtain confirmation of the existence or not of personal data concerning him/herself, even if not yet recorded, their communication in an intelligible form and the possibility to complain to the competent Supervisory Authority
2. The data subject has the right to be informed about:
 - a. the origin of the personal data;
 - b. the purposes and methods of processing;
 - c. the logic applied in case of processing performed via electronic means;
 - d. the personal details of the controller, processors and representative designated pursuant to art. 5, paragraph 2;
 - e. the subjects or categories of subjects to whom the personal data may be disclosed or who may become aware of it as representative designated in the State, data controllers or processors.
3. The data subject has the right to obtain:
 - a. the updating, rectification or, when so interested, completion of any incomplete data;
 - b. the erasure, transformation into anonymous form or blocking of unlawfully processed data, including those whose retention is unnecessary for the purposes for which the data were collected or subsequently processed;
 - c. statement that the operations referred to in a) and b) above have been brought to the attention, also as regards their content, of those to whom the data have been communicated and disclosed, except for the case such fulfilment is impossible or involves means manifestly disproportionate to the protected right;
 - d. data portability.

4. The data subject has the right to object, in whole or in part:
- a. for legitimate reasons, to the processing of personal data concerning him/herself, even if relevant to the purposes of their collection;
 - b. to the processing of personal data concerning him/herself, for the purpose of sending advertising or direct sale material or for the carrying out of market research or commercial communication.

Arezzo, 20 January 2021