

# Privacy Policy and Cookies

## PRIVACY POLICY

### I – INFORMATION REGARDING THE PRIVACY POLICY OF THE SITE

1. This section contains information on how to manage palazzotilli.it in relation to the processing of data of users of palazzotilli.it
2. This information is also valid for the purposes of Article 13 of the Italian Legislative Decree. n. 196/2003, Personal Data Protection Code, and for the purposes of Article 13 of EU Regulation No. 2016/679, on the protection of individuals with regard to the processing of personal data and the free movement of such data, for subjects that interact with palazzotilli.it and can be reached at the address corresponding to the home page: palazzotilli.it
3. The information is provided only for palazzotilli.it and not for other websites that may be consulted by the user through links in it.
4. The purpose of this document is to provide information about the methods, timing and nature of the information that the data controllers must provide to users when connecting to the web pages of palazzotilli.it, regardless of the purpose of the connection itself, according to Italian and European legislation.
5. The information may be subject to changes due to the introduction of new rules in this regard, we invite you to periodically check this page.
6. If the user is under 16 years of age, pursuant to Article 8, paragraph 1 EU Regulation 2016/679, he must legitimize his consent through the permission of his parents or those who act on his behalf.

### II –DATA PROCESSING

#### 1 –Data Controller

1. The controller is the natural or legal person, public authority, service or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data. It also deals with security profiles.
2. With regard to this website, the data controller is: Palazzo Tilly srl, and for any clarification or exercise of your rights you may contact him at the following e-mail address: palazzotillysrl@gmail.com

#### 2 –Data Processor

1. The controller is the natural or legal person, public authority, service or other body that processes personal data on behalf of the controller.
2. Pursuant to Article 28 of EU Regulation 2016/679, upon appointment of the data controller, the data processor of the palazzotilli.it website is: Antonella Allegrino

#### 3 –Place of data processing

1. The processing of data generated by the use of palazzotilli.it takes place at via Alento, 101 Pescara.
2. If necessary, the data connected to the newsletter service may be processed by the data controller or subjects appointed by him for this purpose at the relevant office

### **III – COOKIES**

#### **1 –Types of Cookies**

1. The site palazzotilli.it uses cookies to make the user's browsing experience easier and intuitive: cookies are small strings of text used to store some information that may concern the user, its preferences or the Internet access device (computer, tablet or mobile phone) and are mainly used to adapt the operation of the site to user expectations, offering a more personalized browsing experience and memorizing the choices made previously.
2. A cookie consists of a reduced set of data transferred to the user's browser from a web server and can only be read by the server that made the transfer. It is not executable code and does not transmit viruses.
3. Cookies do not record any personal information and any identifiable data will not be stored. If you wish, you can prevent the storage of some or all cookies. However, in this case the use of the site and the services offered may be compromised. To proceed without changing the options related to cookies, simply continue browsing.

Here are the types of cookies that the site uses:

#### **2 –Technical cookies**

1. There are numerous technologies used to store information on the user's computer, which are then collected by the sites. Among these the most known and used is that of HTML cookies. They are used for navigation and to facilitate access and use of the site by the user. They are necessary for the transmission of communications on the electronic network or to the supplier to provide the service requested by the customer.
2. The settings to manage or disable cookies may vary depending on the internet browser used. However, the user can manage or request the general deactivation or cancellation of cookies, by changing the settings of his internet browser. This can slow down or prevent access to certain parts of the site.
3. The use of technical cookies allows the safe and efficient use of the site.
4. Cookies that are placed in the browser and retransmitted through Google Analytics or through the statistical service of bloggers or similar are technical only if used for the purpose of optimization of the site directly by the owner of the site itself, which may collect information in aggregate form on the number of users and how they visit the site Under these conditions, the same rules apply for analytics cookies, in terms of information and consent, provided for technical cookies.
5. From the point of view of duration, you can distinguish temporary session cookies that are automatically deleted at the end of the browsing session and serve to identify the user and thus avoid login to each page visited and those permanent that remain active in the PC until expiration or cancellation by the user.
6. Session cookies may be installed in order to allow access and stay in the reserved area of the portal as an authenticated user.

7. They are not stored in a persistent way but exclusively for the duration of navigation until the browser is closed and disappear with the closure of the same. Their use is strictly limited to the transmission of session identifiers consisting of random numbers generated by the server necessary to allow safe and efficient exploration of the site.

### **3 –Third-party cookies**

1. In relation to the origin, we distinguish the cookies sent to the browser directly from the site you are visiting and those of third parties sent to your computer from other sites and not from the one you are visiting.
2. Permanent cookies are often third-party cookies.
3. Most third-party cookies consist of tracking cookies used to identify online behavior, understand interests and then customize advertising proposals for users.
4. Analytical third-party cookies may be installed. They are sent by domains of said third parties external to the site.
5. Third-party analytical cookies are used to detect information about user behavior on palazzotilli.it. The survey takes place anonymously, in order to monitor the performance and improve the usability of the site. Third-party profiling cookies are used to create profiles related to users, in order to propose advertising messages in line with the choices made by the users themselves
6. The use of these cookies is governed by the rules established by the third parties themselves, therefore, users are invited to read the privacy policies and the instructions to manage or disable the cookies published on the relevant web pages.

## **IV –DATA PROCESSED**

### **1 –Data processing methods**

1. Like all websites, this site also makes use of log files in which information collected in an automated way during user visits is stored. The information collected could be as follows:
  - Internet Protocol address (IP);
  - browser type and device parameters used to connect to the site;
  - name of the internet service provider (ISP);
  - date and time of visit;
  - visitor origin (referral) and exit web page;
  - possibly the number of clicks.
2. The above information is processed in automated form and collected in an exclusively aggregated form in order to verify the proper functioning of the site, and for security reasons. This information will be processed according to the legitimate interests of the owner.
3. For security purposes (spam filters, firewalls, virus detection), the automatically recorded data may also include personal data such as the IP address, which could be used, in accordance with applicable laws, in order to block attempts to damage the site itself or to cause harm to other users, or otherwise harmful activities or constitute a crime. Such data are never used for the identification or profiling of the user, but only for the protection of the site and its users, such information will be processed according to the legitimate interests of the owner.

4. If the site allows the inclusion of comments, or in case of specific services requested by the user, including the possibility of sending the Curriculum Vitae for a possible working relationship, the site automatically detects and records certain user identification data, including the email address. This data is voluntarily provided by the user at the time of the service request. By entering a comment or other information, the user expressly accepts the privacy policy, and in particular consents to the contents entered being freely disclosed to third parties. The data received will be used exclusively for the provision of the requested service and only for the time necessary for the provision of the service.
5. The information that users of the site deem to be made public through the services and tools made available to them is provided by the user knowingly and voluntarily, exempting this site from any liability for possible violations of the law. It is up to the user to verify that he/she has the permissions to enter personal data of third parties or content protected by national and international regulations.

## **2 – Purpose of data processing**

1. The data collected by the site during its operation are used exclusively for the above-mentioned purposes and kept for the time strictly necessary to carry out the specified activities, and in any case no longer than 2 years.
2. Data used for security purposes (blocking attempts to damage the site) are retained for the time strictly necessary to achieve the aforementioned purpose.

## **3 –Data provided by the user**

1. As indicated above, the optional, explicit and voluntary sending of e-mails to the addresses indicated on this site entails the subsequent acquisition of the sender's address, which is necessary to reply to requests, as well as any other personal data included in the message.
2. Specific summary information will be progressively reported or displayed on the pages of the site set up for particular services on request.

## **4 –Support in configuring your browser**

1. The user can also manage cookies through your browser settings. However, deleting cookies from your browser may remove the preferences you have set for the site.
2. For further information and support, you can also visit the specific help page of the web browser you are using:

– Internet Explorer: <http://windows.microsoft.com/en-us/windows-vista/block-or-allow-cookies>

– Firefox: <https://support.mozilla.org/en-us/kb/enable-and-disable-cookies-website-preferences>

– Safari: <http://www.apple.com/legal/privacy/it/>

– Chrome: <https://support.google.com/accounts/answer/61416?hl=it>

– Opera: <http://www.opera.com/help/tutorials/security/cookies/>

## **5 – Plugin Social Network**

1. This site also incorporates plugins and/or buttons for social networks, in order to enable easy sharing of content on your favorite social networks. These plug-ins are programmed in such a way as not to set any cookies when accessing the page, in order to safeguard users' privacy. Cookies are only set, if so provided by social networks, when the user makes actual and voluntary use of the plugin. Please note that if the user browses while logged into the social network then he/she has already consented to the use of cookies conveyed through this site at the time of registration to the social network.
2. The collection and use of information obtained by means of the plugin is governed by the respective privacy policies of the social networks, to which please refer:

Facebook: <https://www.facebook.com/help/cookies>

Twitter: <https://support.twitter.com/articles/20170519-uso-dei-cookie-e-di-altre-tecnologie-simili-da-parte-di-twitter>

Google+: <http://www.google.com/policies/technologies/cookies>

Pinterest: <https://about.pinterest.com/it/privacy-policy>

AddThis: <http://www.addthis.com/privacy/privacy-policy>

Linkedin: <https://www.linkedin.com/legal/cookie-policy>

### 1. **USER RIGHTS**

2. Article 13, paragraph 2 of EU Regulation 2016/679 lists user rights.
3. The site palazzotilli.it therefore intends to inform the user about the existence:

– of the data subject's right to request from the data controller access to personal data (Article 15 EU Regulation), their update (Article 7(3)(a) Legislative Decree 196/2003), rectification (Article 16 EU Regulation), integration (Article 7(3)(a) Legislative Decree 196/2003) or restriction of the processing concerning him/her (Article 18 EU Regulation) or to object, on legitimate grounds, to their processing (Article 21 EU Regulation), as well as the right to data portability (Article 20 EU Regulation);

– of the right to request the deletion (Article 17 EU Regulation), transformation into anonymous form or blocking of data processed in breach of the law, including data whose storage is not necessary in relation to the purposes for which the data were collected or subsequently processed (Article 7(3)(b) Legislative Decree 196/2003);

– of the right to obtain certification that the operations of updating, rectification, integration of data, deletion, blocking of data, and transformation have been brought to the attention, also with regard to their content, of those to whom the data have been communicated or disseminated, except where this proves impossible or involves a manifestly disproportionate effort compared to the right being protected (Article 7(3)(c) of Legislative Decree 196/2003);

3. Requests can be addressed to the data controller, without formality or, alternatively, using the model provided by the Guarantor for the Protection of Personal Data, or by sending an email to the address: [palazzotillysrl@gmail.com](mailto:palazzotillysrl@gmail.com);
4. Where processing is based on Article 6, paragraph 1, letter a) - express consent to use - or Article 9, paragraph 2 letter a) - express consent to the use of genetic, biometric, health-related data revealing religious beliefs, or philosophical or union membership, which reveal

racial or ethnic origin, political opinions - the user has the right to revoke consent at any time without prejudice to the lawfulness of processing based on consent given before the revocation.

5. Similarly, in case of violation of the law, the user has the right to lodge a complaint with the Guarantor for the Protection of Personal Data, as the authority responsible for controlling the processing in the Italian State.
6. For a more in-depth examination of your rights, see Articles 15 and later of EU Regulation 2016/679 and Article 7 of Legislative Decree 196/2003.

## **VI –DATA TRANSFER TO NON-EU COUNTRIES**

1. This site may share some of the data collected with services located outside the European Union area. In particular with Google, Facebook and Microsoft (LinkedIn) through social plugins and the Google Analytics service. The transfer is authorised and strictly regulated by article 45, paragraph 1 of EU Regulation 2016/679, so no further consent is required. The companies mentioned above guarantee their adherence to the Privacy Shield.
2. Data will never be transferred to third countries that do not comply with the conditions set out in Article 45 and following of the EU Regulation.

## **VII. SAFETY DATA PROVIDED**

1. This website processes your data in a lawful and correct manner, taking appropriate security measures to prevent unauthorized access, disclosure, modification or destruction of data. The processing is carried out by means of computer and/ or telematic tools, with organizational methods and logic closely related to the purposes indicated.
2. In addition to the owner, in some cases, they may have access to data categories of persons in charge of the organization of the site (administrative, commercial, marketing, legal, system administrators) or external parties (such as third-party technical service providers, postal couriers, hosting providers, IT companies, communication agencies)..

## **VIII. AMENDMENTS TO THIS DOCUMENT**

1. This document, published at:

constitutes the privacy policy of this site.

2. It may be subject to change or update. Users are invited to periodically consult this page to be updated on the latest legislative news.
3. Previous versions of the document will still be available on this page.
4. The document was updated on 24/05/2018 to comply with the relevant regulatory provisions, and in particular in compliance with EU Regulation 2016/679.