

Privacy Policy

Dear Customer, De Götzen S.r.l. welcomes you to the website <https://degotzen.it> (the "Website") and invites you to carefully read the following privacy notice (the "Notice"), issued pursuant to Article 13 of Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data ("GDPR").

This document contains a description of all the data processing activities carried out by the Data Controller, as defined below, through the Website.

1. Who is the Data Controller

The Data Controller is De Götzen S.r.l., headquartered at Strada Provinciale Busto-Cassano no. 3 - 21054 Fagnano Olona (VA), Italy.

You may contact the Data Controller directly to exercise your rights or to request any information regarding the processing of your personal data and/or this Notice by writing to:

privacy.it@acteongroup.com

2. What personal data we process

2.1 Browsing data

The IT systems and software procedures used to operate this website acquire, during their normal operation, certain personal data whose transmission is implicit in the use of Internet communication protocols. These are pieces of information that are not collected to be associated with identified individuals but which, by their very nature, could allow users to be identified through processing and association with data held by third parties.

This category of data includes the IP addresses or domain names of the computers used by users connecting to the website, the URI (Uniform Resource Identifier) addresses of the requested resources, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the server's response (successful, error, etc.), and other parameters related to the user's operating system and IT environment.

These data are used solely to obtain anonymous statistical information about the use of the website and to ensure its proper functioning; they are deleted after processing. The data may be used to ascertain responsibility in the event of hypothetical cybercrimes against the website.

2.2 Data Provided Voluntarily by the User

The optional, explicit, and voluntary sending of emails via forms for handling requests and accessing restricted areas, to the addresses indicated on this site, results in the acquisition of the sender's email address, which is necessary to respond to requests, as well as any other personal data voluntarily communicated to the Data Controller through the submission of documentation required to process the request.

Unless you provide additional personal data for the management of your request, for the purposes indicated in this Notice, the Data Controller processes the following personal data:

- **Personal information:** name, surname, address, phone number, email, and other contact details.

The Data Controller will exclusively process personal data directly provided by you in relation to contractual relationships.

2.3 Cookies

The website <https://degotzen.it> does not use any techniques for the direct acquisition of users' personal identification data or user profiling systems. The Data Controller only installs session cookies, which are not retained after the website session ends. Our IT systems do not use cookies to transmit personal information nor any type of persistent cookies.

Statistics Cookies

Third parties may use cookies, even in aggregated form, to manage statistics. Below is the name of the third-party providers managing these cookies, along with links to the relevant pages where you can find information about data processing and express your consent:

Google Analytics

Use of Google Analytics Service: This is a service provided by Google Inc. that uses cookies stored on the user's device to perform aggregated statistical analyses regarding the use of the visited site. Below are useful links regarding this service:

Privacy Policy: <http://www.google.com/policies/privacy>

Cookie Policy: <https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>

Opt-Out: <https://tools.google.com/dlpage/gaoptout?hl=en>

2.4 How to Disable/Delete Cookies via Browser Settings

To learn how to disable or delete cookies installed via your browser, refer to Section 11 of this Notice, which outlines your rights.

3. For What Purposes Are Your Personal Data Processed, and What Is the Legal Basis for Processing?

This section describes the possible purposes of processing pursued by the Data Controller depending on the service you request.

3.1 Contact Requests and Information Sharing

Users can contact the Company using the telephone numbers and email addresses provided in the "Contact" section, where the references of the headquarters are listed. Receiving spontaneous communications from users necessarily involves the Data Controller acquiring the user's email

address and/or name. The purpose of this data collection is to respond to requests for information about the services provided.

3.2 Completion of Forms/Contact Modules in Dedicated/Restricted Areas

If users fill out forms or contact modules in dedicated or restricted areas, the personal data provided will be processed to manage the related service or request.

4. Website Management

Your personal data described in sections 3.1 and 3.2 may also be processed by the Data Controller to manage the Website, conduct anonymous statistical analyses on its use, monitor its proper functioning, and/or ascertain responsibility in case of hypothetical cybercrimes against the Website. In any case, such data will be processed in an anonymous form and will be deleted immediately after processing.

The legal basis for this processing is the Data Controller's legitimate interest in ensuring the correct use of the Website and preventing potential cybercrimes, in accordance with Article 6, paragraph 1, letter f) of the GDPR. Consequently, your consent will not be required.

5. How Your Personal Data Will Be Processed

The processing of your personal data will be carried out, in compliance with the provisions of the GDPR, using paper, electronic, and telematic tools, with methods strictly related to the purposes indicated, and in any case in a manner that ensures their security and confidentiality, in accordance with Article 32 of the GDPR.

6. To Whom Your Personal Data May Be Disclosed and Who May Access It

For the purposes described in section 3, your personal data will be accessed by employees, equivalent personnel, and collaborators of the Data Controller, who will act as individuals authorized to process personal data.

Additionally, your personal data will be disclosed to and processed by third parties, only if strictly necessary and for the time required to perform the processing, belonging to the following categories:

- a. entities engaged by the Data Controller for the management of the Website;
- b. companies managing the Data Controller's IT system;
- c. companies and consultants providing legal and/or tax advisory services.

The entities belonging to the categories listed above may, in some cases, operate entirely independently as separate Data Controllers; in other cases, they may act as Data Processors appointed by the Data Controller in compliance with Article 28 of the GDPR.

A complete and updated list of entities to whom your personal data may be disclosed can be requested from the Data Controller.

Your personal data will not be transferred to third parties outside the European Union and will not be publicly disseminated.

7. What Are Your Rights as a Data Subject

In relation to the processing described in this Notice, as a data subject, you may, under the conditions provided by the GDPR, exercise the rights established in Articles 15 to 21 of the GDPR, in particular:

- **Right of access – Article 15 GDPR:**

The right to obtain confirmation as to whether or not personal data concerning you is being processed, and, where that is the case, access to your personal data – including a copy – and the following information:

- a. the purposes of the processing;
- b. the categories of personal data processed;
- c. the recipients to whom the data has been or will be disclosed;
- d. the period for which the data will be stored or the criteria used to determine that period;
- e. the rights available to the data subject;
- f. the right to lodge a complaint;
- g. information about the source of your personal data if not collected from you;
- h. the existence of automated decision-making, including profiling.

- **Right to rectification – Article 16 GDPR:**

The right to obtain, without undue delay, the correction of inaccurate personal data and/or the completion of incomplete personal data.

- **Right to erasure (right to be forgotten) – Article 17 GDPR:**

The right to obtain, without undue delay, the deletion of your personal data when:

- a. the data is no longer necessary for the purposes for which it was collected or otherwise processed;
- b. you withdraw your consent, and there is no other legal basis for the processing;
- c. you successfully object to the processing of your personal data;
- d. the data has been unlawfully processed;
- e. the data must be deleted to comply with a legal obligation;
- f. the personal data has been collected in connection with the offering of information society services under Article 8(1) GDPR.

The right to erasure does not apply to the extent that processing is necessary to fulfill a legal obligation, perform a task carried out in the public interest, or for the establishment, exercise, or defense of legal claims.

- **Right to restriction of processing – Article 18 GDPR:**

The right to obtain restriction of processing where:

- a. the accuracy of personal data is contested by the data subject;
- b. the processing is unlawful, and the data subject opposes the deletion of personal data and requests the restriction of its use instead;
- c. the personal data is required by the data subject for the establishment, exercise, or defense of legal claims;

d. the data subject has objected to processing, pending verification of whether the legitimate grounds of the Data Controller override those of the data subject.

- **Right to data portability – Article 20 GDPR:**

The right to receive, in a structured, commonly used, and machine-readable format, the personal data you have provided to the Data Controller and the right to transmit that data to another controller without hindrance, where processing is based on consent and carried out by automated means. Additionally, the right to have your personal data transmitted directly from one Data Controller to another, where technically feasible.

- **Right to object – Article 21 GDPR:**

The right to object, at any time, for reasons related to your particular situation, to the processing of personal data based on the legitimate interest of the Data Controller, public interest, or the exercise of official authority, including profiling, unless there are compelling legitimate grounds for the Data Controller to continue processing that override your interests, rights, and freedoms or for the establishment, exercise, or defense of legal claims. Furthermore, the right to object at any time to the processing of personal data for direct marketing purposes, including profiling to the extent that it is related to such marketing.

These rights can be exercised by contacting the Data Controller using the contact details provided above. Exercising your rights as a data subject is free of charge under Article 12 GDPR.

8. How and When You Can Object to the Processing of Your Personal Data

You can object at any time to the processing of your personal data if it is based on legitimate interest by sending a request to the Data Controller at privacy.it@acteongroup.com. You have the right to have your personal data deleted if there is no overriding legitimate reason for the processing that justifies your objection.

9. How to Lodge a Complaint

Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a supervisory authority in the Member State of your habitual residence, place of work, or where the alleged infringement occurred.

10. Changes and Updates

This policy is effective as of the date indicated in its header. De Götzen S.r.l. may make changes and/or additions to this privacy notice, including in response to regulatory updates. Any changes will be notified in advance, and you will always be able to consult the updated version of the privacy notice in the Privacy section of the Website.

11. Cookies - Deletion

How to disable/delete cookies through browser settings

You can configure your browser to prevent the installation of all cookies. Depending on the browser you use, please refer to the following instructions and ensure you also check any additional steps provided by the respective browser for disabling cookies:

Chrome

1. Open Chrome on your computer.
2. Click on *More* and then choose *Settings* in the top right corner.
3. Scroll to the bottom and click *Advanced*.
4. Under the "Privacy and security" section, click *Content settings*.
5. Click *Cookies*.
6. From here, you can:
 - Enable cookies: toggle on the option next to "Blocked".
 - Disable cookies: turn off the option "Allow sites to save and read cookie data".
For more information, visit the [dedicated page](#).

Mozilla Firefox

1. Open the Mozilla Firefox browser.
2. Click on the menu button in the browser's toolbar next to the address bar.
3. Select *Options*.
4. Select the *Privacy & Security* panel.
5. Navigate to the *History* section.
6. In the "History settings" dropdown, choose *Use custom settings for history*.
 - To enable cookies, check the option *Accept cookies from sites*;
 - To disable cookies, uncheck the option.
For more information, visit the [dedicated page](#).

Internet Explorer

1. In Internet Explorer, select the *Tools* button and then choose *Internet Options*.
2. Select the *Privacy* tab, then under *Settings*, select *Advanced* and choose whether to allow, block, or be prompted for first-party and third-party cookies.
For more information, visit the [dedicated page](#).

Safari

1. Open the Safari browser.
2. Click on *Safari*, select *Preferences*, and go to the *Privacy* tab.
3. In the *Block Cookies* section, specify how Safari should handle cookies from websites.
4. To see which sites have stored cookies, click *Details*.
For more information, visit the [pagina dedicata](#).

Safari iOS (mobile devices)

To block cookies in Safari, go to *Settings > Safari > Block All Cookies*.

For more information, visit the [dedicated page](#).

Opera

1. Open the Opera browser.
 2. Click on *Settings*, then *Advanced*, and finally go to *Privacy & Security*.
 3. Click on *Site Settings* and choose *Cookies and site data*.
 4. Select one or more of the following options:
 - Allow sites to save and read cookie data.
 - Clear cookies and site data when you close Opera.
 - Block third-party cookies.
 5. You can manually customize cookie handling by using the *Add* function to include a site under one of the following categories:
 - Block.
 - Clear on Exit.
 - Allow.
- For more information, visit the [dedicated page](#).