

# INFORMATION FOR THE PROCESSING OF PERSONAL DATA

## (Privacy Policy)

**Teroro Agency SRL-D**, with registered office in Strada Plevnei 4, BL B5, SC2, AP62, Focsani (620119), Vrancea, Romania with VAT number RO35636761 (hereinafter "**Holder**") as data controller, inform pursuant to art. 13 EU Regulation n. 2016/679 (hereinafter, "**GDPR**") that your data will be processed in the manner and for the following purposes:

### 1. Object of the treatment

The Data Controller processes the Personal Identification Data (for example, name, surname, company name, address, telephone number, e-mail address, bank and payment details) - hereinafter, "Personal Data" communicated by you but also "Data" collected by our websites.

### 2. Type of collected Data

Among the Personal Data collected from our websites, either independently or through third parties, there are: Cookies e Usage data.

Full details on each type of Data collected are provided in the dedicated sections of this privacy policy or through specific information texts displayed before the data are collected. Personal Data may be freely provided by the web User or, in the case of Usage Data, collected automatically during the use of our websites.

Unless otherwise specified, all the data requested by our websites are mandatory. If the User refuses to communicate them, it may be impossible for our websites to provide the Service. In cases where our websites indicate some Data as optional, Users are free to refrain from communicating such Data, without this having any consequences on the availability of the Service or on its operation. Users who have doubts about which data are mandatory, can contact the owner. Any use of cookies - or other tracking tools - by our websites or holders of third-party services used by our websites, unless otherwise specified, has the purpose of provide the Service requested by the User, in addition to the other purposes described in this document and in the Cookie Policy.

The User assumes the responsibility of the Personal Data of third parties obtained, published or shared through our websites and guarantees to have the right to communicate or disseminate them, freeing the owner from any responsibility towards third parties.

### 3. Purpose of the processing

Your Personal Data are processed:

- without your express consent (Article 6 letter b), e) GDPR), for the following Service Purposes:
  - conclude contracts for the services of the Owner;
  - fulfill the pre-contractual, contractual and tax obligations deriving from relations with you in existence;
  - fulfill the obligations established by law, by a regulation, by community legislation or by an order of the Authority (such as for anti-money laundering);
  - exercise the rights of the owner, for example the right to defense in court;
- only subject to your specific and distinct consent (Article 7 of the GDPR), for the following Marketing Purposes:
  - send you via e-mail, mail and / or text messages and / or telephone contacts, newsletters,

- commercial communications and / or advertising and information material about products or services offered by the Data Controller;
- send you via e-mail and / or telephone contacts questionnaires for the detection of the degree of satisfaction on the quality of services;
  - publish on all our multimedia platforms (websites and social networks) for promotional purposes, images and photographs of works carried out for your account;

Please note that if you are already a customer, we may send you commercial communications relating to services and products of the Owner similar to those you have already used, subject to your dissent.

#### 4. Processing methods

The processing of your personal data is carried out by means of the operations indicated in art. 4 n. 2) GDPR and more precisely: collection, registration, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, cancellation and destruction of data. Your Personal Data are subjected to both paper and electronic and / or automated processing. The Data Controller will process the Personal Data for the time necessary to fulfill the aforementioned purposes and in any case for no more than 10 years from the termination of the relationship for the Purposes of Service

#### 5. Statistics and Interaction with Social Networks and External Platforms

The Data concerning the User is collected to allow the Owner to provide its Services, as well as for the following purposes: Statistics and Interaction with social networks and external platforms.

- Interaction with social networks and external platforms: this type of service allows interaction with social networks, or with other external platforms, directly from the pages of our websites. The interactions and information acquired from our websites are in any case subject to the User's privacy settings related to each social network. In the case in which a service of interaction with social networks is installed, it is possible that, even if the Users do not use the service, the same collect Traffic Data related to the pages in which it is installed. Like button and Facebook social widgets (Facebook, Inc.) The "Like" button and Facebook social widgets are services of interaction with the Facebook social network, provided by Facebook, Inc. Personal Data collected: Cookies and Usage Data . Place of processing: United States - Privacy Policy. Person adhering to the Privacy Shield. Tweet button and Twitter social widgets (Twitter, Inc.) Tweet button and Twitter social widgets are services of interaction with the Twitter social network, provided by Twitter, Inc. Personal Data collected: Cookies and Usage Data. Place of processing: United States - Privacy Policy. Person adhering to the Privacy Shield.
- Statistics: the statistics allow the Data Controller to monitor and analyze traffic data and are used to keep track of User behavior. This is done through Google Analytics, a web analytics service provided by Google Inc. ("Google"). Google uses Personal Information collected for the purpose of evaluating the use of this Website, compiling reports and sharing them with other services developed by Google. Google may use the Personal Data to contextualise and personalize the advertisements of its advertising network. Personal Data collected: Cookies and Usage Data. Place of processing: United States - Privacy Policy - Opt Out. Person adhering to the Privacy Shield.

#### 6. Cookie Policy

Our websites use cookies. Cookies consist of portions of code installed in the browser that assist the Owner in providing the Service according to the purposes described. Some of the purposes of installation of cookies may also require the consent of the User. When the installation of Cookies is based on consent, this consent can be freely revoked at any time by following the instructions contained in this document. Our websites use cookies to save the User session and to perform other activities strictly necessary for the functioning of our websites, for example in relation to the distribution of traffic. Our websites use cookies to save browsing preferences and

optimize the User's browsing experience. These cookies include, for example, those for setting the language and currency or for the management of statistics by the owner of the site. In addition to what is indicated in this document, the User can manage preferences related to cookies directly within his browser and prevent - for example - that third parties can install.

Through the preferences of the browser it is also possible to delete the cookies installed in the past, including the cookie in which the consent to the installation of cookies by this site is eventually saved. The User can find information on how to manage cookies with some of the most popular browsers, for example at the following addresses:

- Internet Explorer: <https://support.microsoft.com/en-us/help/17442/windows-internet-explorer-delete-manage-cookies>
- Google Chrome: <https://support.google.com/chrome/answer/95647>
- Mozilla Firefox: <https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer>
- Opera: <https://www.opera.com/help/tutorials/security/privacy/>
- Safari: <https://support.apple.com/kb/PH19255>

With reference to Cookies installed by third parties, the User can also manage his own settings and revoke the consent by visiting the relevant log out link (if available), using the tools described in the third party's privacy policy or by contacting the latter directly. Notwithstanding the foregoing, the User may use the information provided by EDAA (EU), Network Advertising Initiative (USA) and Digital Advertising Alliance (USA), DAAC (Canada), DDAI (Japan) or other similar services. With these services you can manage tracking preferences of most advertising tools. The Owner, therefore, advises Users to use these resources in addition to the information provided by this document.

### **Cookie tecnici**

The use of technical cookies, that is cookies necessary for the transmission of communications on the electronic communication network or cookies strictly necessary to the supplier to provide the service requested by the customer, allows the safe and efficient use of our site.

Session cookies may be installed in order to allow access to and access to the reserved area of the portal as an authenticated user.

Technical cookies are essential for the proper functioning of our website and are used to allow users normal browsing and the opportunity to take advantage of the advanced services available on our website. The technical cookies used are distinguished in session cookies, which are stored exclusively for the duration of navigation until the browser is closed, and persistent cookies that are saved in the user's device memory until their expiration or cancellation by the user same. Our site uses the following technical cookies:

- Technical browsing or session cookies, used to manage normal browsing and user authentication;
- Functional technical cookies, used to store customizations chosen by the user, such as, for example, the language;
- Technical analytics cookies, used to know how users use our website so that they can evaluate and improve their functioning.

### **Third-party cookies**

Third-party cookies may be installed: these are cookies, analytical and profiling, Google Analytics, Google Doubleclick, Youtube, Yahoo, Bing, Facebook, Facebook Pixel and Yandex. These cookies are sent from the websites of the aforementioned third parties external to our site. The analytical cookies of third parties are used to detect information on the behavior of users on the site. The survey takes place anonymously, in order to monitor the performance and improve the usability of the site. The third-party profiling cookies are used to create profiles related to users, in order to propose advertising messages in line with the choices expressed by the users themselves. The use of these cookies is governed by the rules set by the third parties themselves, therefore,

users are invited to view the privacy policies and indications to manage or disable cookies published on the following web pages:

For Google Analytics cookies:

- privacy policy: <https://www.google.com/intl/en/policies/privacy/>
- indications to manage or disable cookies: <https://support.google.com/accounts/answer/61416?hl=en>

For Google Doubleclick cookies:

- privacy policy: <https://policies.google.com/privacy?hl=en>
- indications to manage or disable cookies: <https://www.google.com/settings/ads/plugin>

For Youtube cookies:

- privacy policy: <https://www.youtube.com/intl/en/yt/about/policies/#community-guidelines>
- indications to manage or disable cookies: <https://support.google.com/accounts/answer/61416?hl=en>

For Yahoo cookies:

- privacy policy and indications to manage or disable cookies:  
<https://policies.yahoo.com/ie/it/yahoo/privacy/eu oathnoticefaq/>

For Bing cookies:

- privacy policy and indications to manage or disable cookies:  
<https://privacy.microsoft.com/en-US/privacystatement>

For Yandex cookies:

- privacy policy and indications to manage or disable cookies:  
<https://yandex.com/support/metrica/general/gdpr.html>

## **Profiling cookies**

They can be installed by the Owner (s) using the software of c.d. web analytics, profiling cookies, which are used to prepare detailed and real-time analysis reports on information about: visitors to a website, search engines of origin, keywords used, language of use, most visited pages.

The same can collect information and data such as IP address, nationality, city, date / time, device, browser, operating system, screen resolution, navigation source, pages visited and number of pages, duration of the visit, number of visits.

Such data may be transferred to each of the Aruba Group companies, in compliance with and with the limitations imposed by current legislation and the provisions of this Information Notice.

## **7. Accesso ai dati**

Your data may be made accessible for the purposes referred to in art. 2.A) and 2.B):

- to employees and collaborators of the Data Controller, in their capacity as persons in charge and / or internal managers of the processing and / or system administrators;
- to third-party companies or other subjects (as an indication, credit institutions, professional firms, consultants, insurance companies for the provision of insurance services, etc.) who carry out outsourced activities on behalf of the Owner, in their capacity as external managers of treatment.

## 8. Communication of Data

Without the need for an express consent (Article 6 letter b) and c) GDPR), the Data Controller may communicate your data for the purposes referred to in art. 2.A) to Supervisory Bodies, Judicial Authorities, to insurance companies for the provision of insurance services, as well as to those subjects to whom the communication is mandatory by law for the accomplishment of said purposes. These subjects will process the Data in their capacity as independent data controllers.

## 9. Data transfer

Personal Data is stored on servers located in the United States of America and in European Union countries. The Data Controller ensures that the transfer of non-EU Data takes place in accordance with the applicable legal provisions and upon the conclusion of the standard contractual clauses provided for by the European Regulations.

## 10. Nature of the provision of data and consequences of refusing to respond

The provision of data for the purposes referred to in art. 2.A) is mandatory. In their absence, we can not guarantee the services of the art. 2.A). The provision of data for the purposes referred to in art. 2.B) is optional. You can therefore decide not to give any data or to subsequently deny the possibility of processing data already provided: in this case, you will not receive newsletters, commercial communications and advertising material relating to the Services offered by the Data Controller. However, you will continue to be entitled to the Services referred to in art. 2.A).

## 11. Rights of the interested party

In your capacity as an interested party, you have the rights set forth in art. 15 GDPR and precisely the rights of:

1. obtain confirmation of the existence of personal data concerning you, even if not yet registered, and their communication in an intelligible form;
2. get the indication:
  - a. of the origin of Personal Data;
  - b. the purpose and methods of processing;
  - c. of the logic applied in case of treatment carried out with the aid of electronic instruments;
  - d. of the identifying details of the holder, of the responsables and of the designated representative according to the art 3. Comma 1, GDPR;
  - e. the subjects or categories of subjects to whom the Personal Data may be communicated or who may become aware of it as appointed representative in the territory of the State, managers or agents;
3. obtain:
  - a. updates, rectification or, when interested, integration of data;
  - b. the cancellation, transformation into anonymous form or blocking of data processed unlawfully, including data whose retention is unnecessary for the purposes for which the data were collected or subsequently processed;
  - c. the attestation that the operations referred to in letters a) and b) have been brought to the attention, also with regard to their content, of those to whom the Data have been communicated or disseminated, except in the case in which this fulfillment proves impossible or involves a use of means manifestly disproportionate to the protected right;
4. oppose, in whole or in part:
  - a. for legitimate reasons, the processing of personal data concerning you, even if pertinent to the purpose of collection;

- b. to the processing of Personal Data concerning you for the purpose of sending advertising or direct sales material or for carrying out market research or commercial communication, through the use of automated call systems without the intervention of an operator by means of and -mail and / or through traditional marketing methods by telephone and / or paper mail. It should be noted that the right of opposition of the interested party, set out in point b) above, for direct marketing purposes through automated methods extends to traditional ones and that in any case the possibility remains for the data subject to exercise the right to object even only partially. Therefore, the interested party can decide to receive only communications using traditional methods or only automated communications or none of the two types of communication.

Where applicable, it also has the rights referred to in Articles 16-21 GDPR (Right of rectification, right to be forgotten, right of limitation of treatment, right to data portability, right of opposition), as well as the right of complaint to the Guarantor Authority.

## 12. How to exercise rights

You may exercise your rights at any time or request further information by sending a PEC to [teroro.agency@pec.it](mailto:teroro.agency@pec.it) or an e-mail to [info@teroro.it](mailto:info@teroro.it).

## 13. Further information on treatment

For needs related to the operation and maintenance of our Websites and any third-party services used may collect system logs, ie files that record the interactions and may also contain Personal Information, such as the IP address User. We also inform you that our Websites do not support "Do Not Track" requests. To find out if any third-party services used support them, the User is invited to consult their respective privacy policies.

## 14. Responsible and in charge of processing

The updated list of data processors and data processors is available from the Data Controller or is lost from the "Contracts" section on the institutional website <http://teroro.it>.

## Teroro Agency SRL-D

San Donà di Piave, il 15/09/2018

Alin Costel Ionescu, CEO

