

INFORMATION ON THE DATA PROCESSED BY THE WEBSITE WWW.SABELLI.IT

This is the web page of Sabelli Spa with a registered office in Ascoli Piceno, Zona Ind.le Basso Marino, owner of the processing of your data. To ask for information about the processing and to exercise your rights you can send an e-mail to privacy@sabelli.it.

Where we take your data and what they are. When you connect to a website it is inevitable that certain information is acquired, such as the IP address, date and time of connection, duration of connection and pages visited, and other elements that can be deduced from the navigation program you are using. Moreover, today's websites are dynamic, they allow you to interact with questions and answers, they allow you to connect to social networks, so other information, including on your behaviour, tastes, and preferences, can be acquired to improve your browsing experience and facilitate the search for products and services. Finally, the site needs some technical elements, called cookies, to make it work better and improve your browsing experience. You can also exercise choices concerning these elements.

How and why we process your data. When you come to our site, it is as if you are looking in a shop window and we can see what you are doing from inside the shop. It is in our interest to manage this data to improve the products and services we offer via the web. Your data will be treated anonymously but indirectly your identity may be traced. Other data will only be processed with your explicit consent. In any case, they are entrusted to persons of proven ability and experience, trained to ensure the processing of only the information necessary to achieve the purposes for which they were acquired and safe management, through computer systems and paper files adequately protected. They will not be disseminated, will not be transferred outside the EU, and will be transferred to third parties only with your consent or if required by law or by the Authorities. Some activities may be handled by parties outside our organisation but always under our control. They will be deleted when the purpose for which they were acquired is achieved or changed or upon your specific request, without prejudice to legal obligations.

What are your rights? It is your right to know what data has been collected, how it is managed, to whom it will be transferred, to have a copy of it in electronic form, and to intervene in its processing to request that it be blocked, modified, limited, updated or deleted, using the contact details given at the beginning of this document.

If you feel that this information is not sufficient, we advise you to consult the complete information in the privacy section of the www.sabelli.it website. If you are not satisfied with this information, you can write to us for further clarification, and if these replies are not sufficient, you can contact the Italian Data Protection Authority at www.garanteprivacy.it.

INFORMATION FOR WEBSITE USERS
(includes the processing of navigation data and cookies)

The company Sabelli Spa, with registered office in Ascoli Piceno, Zona Ind.le Basso Marino, VAT no. 01343410443, in its capacity as Data Controller

INFORMS

users connecting to the website www.sabelli.it that the personal data collected by the Data Controller, acquired from third parties or spontaneously conferred by the interested parties, will be processed lawfully and in accordance with fairness, in compliance with the principles enshrined in EU and Italian law. The main rules governing the processing of personal data are European Regulation 679/2016 and Legislative Decree 196/2003, as amended by Legislative Decree 101/2018.

Definitions

<i>Data Subject</i>	The natural person to whom the data processed by the Data Controller or Data Processor belong
<i>Holder</i>	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
<i>Controller</i>	The natural or legal person, public authority, service, or other body which processes personal data on behalf of the controller based on a contract governing the terms of the assignment

Purpose of processing

The processing activities of the data collected through the website are carried out by the owner at the company's premises, in compliance with the security measures and requirements imposed by the European Regulation 679/2016, by subjects appointed or delegated by it (specially selected and with the necessary professionalism), with manual and computerized procedures, to allow the user a simple and rewarding browsing experience, to collect useful elements to improve the offer of products and services through the web, to execute specific requests of the interested party, for pre-contractual and contractual fulfilments, for ordinary administrative, financial and accounting activities, to manage customer requests during the marketing and sale of products or the provision of services, for after-sales assistance, for the fulfilment of legal obligations.

The processing is also aimed at the elaboration of statistics in anonymous form or after a pseudonymisation procedure. At the request of the interested party or following the acquisition of specific consent, the processing may also be carried out to detect the degree of satisfaction, tastes, preferences, and habits of the customer, to send commercial information or advertising material, for direct marketing campaigns, for the issuance of fidelity cards related to particular conditions of sale, for participation in games, contests or sweepstakes, for involvement in events and exhibitions, for the provision of services, for market research and other operations directly or indirectly related to marketing activities.

Data subject to processing

<i>Browsing data</i>	Common	IP address, operating system and browser used for browsing, date and time of connection and disconnection, time spent on the site, pages visited, the activity carried out, location (if the relevant service is active), and any other information made available or transmitted by the data subject's device, according to the security settings chosen
<i>Contacts</i>	Common	First name, Last name, email, telephone, domicile or residence, other data sent by the Data Subject to the Data Controller by e-mail or through the preset forms

Filling in the forms on the website, to receive information on products and services, involves the acquisition of the customer's data in the Data Controller's computer system. The information is protected by an authentication system and can only be accessed by those in possession of the relevant credentials. Communications by e-mail Data subject the natural person to whom the data processed by the Controller or the Manager belong the natural or legal person, public authority, service or other body that, individually or jointly with others, determines the purposes and means of the processing of personal data Manager the natural or legal person, public authority, service or other body that processes personal data on behalf of the controller based on a contract governing the conditions of the assignment involves the storage of the e-mail address of the data subject, necessary to respond to requests made. This includes the data stored in the message. The Controller suggests not transmitting the data or personal information of third parties unless it is necessary

Data of Minors

The data of minors are processed exclusively with the consent of their parents and within the limits imposed by law, subject to the requirements of art. 2-quinquies, Legislative Decree 196/2003, as introduced by Legislative Decree 101/2018.

Nature of conferment

The processing of navigation data is necessary for the proper functioning of the site and in any case limited to the information that is indispensable for this purpose, except as provided for cookies and interaction with external resources, referred to below. Contact data are indispensable to meet the requests of the interested party (pre-contractual activity) and to fulfil any requests concerning existing contractual relationships (information on orders, after-sales assistance, etc.). The provision of such information is therefore necessary, as otherwise, the processing cannot take place. Any incorrect or insufficient communication of data or the blocking of certain functions by the browser could make it totally or partially impossible to fulfil the requests of the interested party.

The legal bases of the processing carried out by the Controller are the fulfilments related to the precontractual and contractual phases of the relationship, the obligations imposed by the law, the legitimate interest of the Controller to manage the data necessary to improve the offer of products and services, the consent expressed by the interested parties. It is possible to ask the Data Controller to specify the legal basis of each processing operation.

Storage terms

The data processed by the Data Controller, without prejudice to legal obligations, are stored until expressly requested for deletion by the Data Subject and in any case are periodically checked, also using automatic procedures, to guarantee that they are up-to-date and that they effectively correspond to the purposes of the processing. If the purpose for which the data was acquired is no longer met, the data will be deleted, unless it has to be processed to comply with regulatory obligations, to protect rights in court, or at the express request of the data subject. At the end of the processing and following the cancellation, the rights of the interested party can no longer be exercised.

Navigation data

The IT system and the software used for the company's web portal acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication products: IP addresses and domain names of the computer used by the user to connect to the site, URL (Uniform Resource Locator) of the requested resource, time of the request, the method used to send the request to the server, size of the file received, numerical code used to indicate the status of the response given by the server (executed or error, etc.) and other parameters relating to the operating system and the user's computer. This information is not stored to identify the persons concerned but, by its nature, may, through processing and association with other data, allow the indirect identification of the user. They are used to compile anonymous statistics on the use of the site and to check that it is functioning correctly. They may be used and provided to the police and the judiciary to ascertain responsibility in the event of damage to the site or offences committed via the network.

The **Newsletter** module allows you to register your e-mail address in a database that will be used for informative communications on the products and services of the owner and commercial, promotional, and marketing purposes. Except for service communications, specific consent, which is not compulsory, will be required for any further type of

processing. The user may revoke his/her subscription to the Newsletter at any time by using the links at the bottom of each communication or by sending a specific request to the Data Controller.

The **Contact** form allows specific requests to be sent to the Data Controller and is used to provide a direct channel with the company. The data sent (name, surname, e-mail, and text of the message) will be stored for the time necessary to respond to the requests of the interested party and then deleted.

Cookie

Certain information regarding navigation is stored on your computer and read by the system the next time you connect. They are stored in a text file called a "cookie". They are not personal, as they do not allow the specific identification of the user but, through interconnection with other data, may allow it. The information contained in cookies makes it possible to see the frequency of visits to a site and the activity carried out during navigation. In this way, over time, the content of the site can be improved and made more user-friendly. Companies that deliver content to the site or whose sites are accessible via links may also use cookies when the user selects the relevant link. In these cases, the use of cookies is not under the direct control of the Data Controller. Most browsers automatically accept cookies, but it is possible to refuse them or select only some of them, according to the preferences set by the user. However, if the user inhibits the loading of cookies, some components of the site may stop working and some pages may be incomplete.

Essential technical cookies	These are cookies that are necessary to ensure that the site functions correctly and smoothly: they allow the pages to be browsed, the content to be shared, the storage of login credentials to speed up access to the site and to keep preferences active while browsing, facilitating the browsing or purchasing experience. Without these cookies, it is not possible to provide, in whole or in part, the services for which users access the site.
Statistical cookies	Allow us to understand how users use the site so that we can evaluate and improve the way it works to create more appropriate content. They allow us to know which pages are the most and least frequented, how many visitors there are on the site, how much time is spent on the site by the average user, and how visitors arrive on the site. In this way, it is possible to determine which functions are optimal and which content is most popular, and how the content and functionality of the pages can be improved.
Analysis cookies	Are used to keep track of the searches made by the user so that we can offer them products and services that match their previous browsing and searches. They are normally used for remarketing operations, through which advertising relating to previous searches and similar products and services is conveyed to the user during navigation.

Profiling cookies.	These are tools designed to store the choices made by the user during navigation and consultation, to create personal profiles that can classify and file tastes, preferences, navigation, and consumption habits. Through the generation of these profiles, the user's browsing experience can be improved, but above all, it can be oriented towards his/her preferences, abilities, and possibilities to purchase or use services. They can be deactivated without creating any obstacle or impediment to navigation.
Third-party cookies	These are cookies used by third parties not directly controlled by the Controller. The Company cannot provide guarantees regarding the use that will be made of the data, the processing of which is directly carried out by an external party. The cookies from third-party operators make it possible to offer advanced functionalities, more information, and personal functions, including the possibility of sharing content through social networks and having a personalised site experience based on the preferences expressed through the pages visited. If you use these external services, the provider may be able to know that you have visited the Owner's site. The use of the data collected by these external operators is subject to their data protection policies. Third-party cookies are identified by the names of their respective operators and can be deactivated.

Managing cookies

By selecting the OK button shown in the banner above, you authorise the installation of cookies on your device. You can change your cookie settings using the specific selectors or through your browser's features. You can prevent the installation of third-party cookies and remove previously installed cookies, including those containing your tastes, habits, and preferences. To adjust or change your browser settings you should consult the help of the software or application manufacturer. Information on how to manage cookies on your browser is available at [Google Chrome](#), [Mozilla Firefox](#), [Apple Safari](#), [Microsoft Internet Explorer](#), [Microsoft Edge](#). Further information on the cookies used by the site can be requested directly from the Data Controller.

Third-party sites.

The site, even only periodically, may contain links to third-party sites and applications (Google Adwords, Analytics, YouTube, Vimeo, etc.), to provide further services and information to the user. When the user uses these links, he/she leaves the company website and accesses other resources that are not under the direct control of the Data Controller, who, therefore shall not be responsible for the procedures relating to navigation, security, and processing of personal data operated by the other sites, even in the presence of co-branding or display of the company logo. It is recommended that you carefully examine the security and privacy procedures of the site you are visiting, which may transmit additional cookies, read those already present on your hard drive, and ask you to acquire additional personal information.

Interaction with external social networks and platforms

The site, through widgets and buttons, may interact with external platforms and social networks. In this case, the information acquired depends on the settings of the profiles used by the user and not by the Owner. The buttons linking to the Facebook, YouTube, LinkedIn, and Instagram platforms make it possible to reach the company's social profiles. Further information on the data processing carried out by these platforms can be acquired from the websites of the companies offering the service. In this case, the data are not managed by the Controller's website, which only

links these buttons to offer an additional service to the Data Subject but has no control over the Automated decision-making processes The Controller does not use automated decision-making processes, including profiling.

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Communication and dissemination

The data processed through the site are exclusive of a common nature and are not intended for dissemination. The Data Controller does not require and has no interest in collecting and processing data classified by the Regulations as "special" (health, genetic, biometric, etc.) or "criminal". The data will be communicated to third parties, who may assume, depending on the type of relationship, the status of a data controller under Art. 28, EU Reg. 679/2016 or mere recipients of the communication, for activities connected with or arising from that of the Data Controller or in the fulfilment of obligations arising from laws or regulations (Institutions, Police, Judicial Authorities, etc.). By way of example and without limitation we mention:

- Subjects who need to know the data of the Data Subject for purposes concerning the relationship with the Data Controller (agencies that manage websites, statistics companies, communication companies, etc.);
- Consultants, collaborators, service companies, to the extent necessary to carry out the task conferred by the Data Controller;
- Subsidiaries and/or associated companies that can access the data, within the limits strictly necessary to carry out the tasks entrusted by the Data Controller;

The updated list of data processors is available at the Data Controller's headquarters.

Transfer abroad

The data may be communicated to entities operating within the European Union or in countries that guarantee the same level of protection required by European Regulation 679/2016.

Rights of the Data Subject

Data subjects are granted the rights set out in Articles 15 to 22 of the GDPR 679/2016. In particular, the Data Subject has the right to access his/her data (art. 15), to ask for its rectification, updating, integration (art. 16), and deletion (art. 17), to limit its use by the Data Controller (art. 18), to obtain a copy of it in a structured, commonly used and machine-readable format (art. 20), to object to its processing if the conditions are met (art. 21 and 22). The rights may be exercised to the extent that the processing is not obligatory by law or regulation. Requests relating to the exercise of the data subject's rights may be forwarded to the Data Controller at privacy@sabelli.it. If the data subject is not satisfied with the response to his/her requests, he/she may lodge a complaint with the Guarantor Authority for the protection of personal data. Citizens of the other Member States of the European Union may apply to the Supervisory Authority of their own country.