

**PRIVACY POLICY OF THIS SITE**  
**PURSUANT TO EUROPEAN REGULATION 679/2016**  
**AND LEG. DECREE 196/2003 AS AMENDED BY LEG. DECREE 101/2018**

**DATA CONTROLLER**

Following the browsing of this site, data relating to identified or identifiable persons may be processed.

The Data Controller is Gruppo Vinicolo Fantinel S.p.A. with registered office in 33097 Tauriano di Spilimbergo (PN), via Tesis 8, Tax Code and VAT number 0048630308, Tel. +39 0427 591511 / Fax +39 0427 591529/539 email: [fantinel@fantinel.com](mailto:fantinel@fantinel.com)

**PURPOSE OF THE PROCESSING**

User data are collected to allow the Owner to provide its Services, as well as for the following purposes: Statistics, Tag management, Remarketing and behavioural targeting, Interaction with external social networks and platforms, Advertising, Display of content from external platforms, SPAM protection, Content and functionality performance test (A/B testing), Contact management and sending of messages, Contacting the User, Heat mapping and session recording, Interaction with platforms for online surveys and Interaction with data collection platforms and other third parties.

In particular:

- a) Browsing on this website / collecting anonymous statistical information on the use of the website and services / checking the correct operation of services offered Art. 6 p. 1 letter f) GDPR – Legitimate interest of the Data Controller: ensuring the correct browsing of the Internet site.
- b) Responding to requests for assistance / contact / information from users [Art. 6 p. 1 letter f) GDPR – Legitimate interest of the Data Controller: responding to user requests].
- c) Personnel selection and evaluation of applications received by email [Art. 6 p. 1 letter b) GDPR - Execution of pre-contractual measures].
- d) Subscription to the newsletter, by filling in the specific form [Art. 6 par. 1 letter a) GDPR – User consent].
- e) Direct marketing: direct sales, market research, newsletters and commercial, promotional and advertising communications through automated means (email, fax, text messages (sms) or mms or other tools) or through telephone calls via operator / post [Art. 6 par. 1 letter a) GDPR – User consent].
- f) Direct marketing through newsletters for the promotion of the Data Controller's products or services similar to those already purchased by the data subject (so-called "soft spam") [Art. 6 p. 1 letter f) GDPR – Legitimate interest of the Data Controller: carrying out marketing activities for its customers].

- g) Disclosure of data to other companies (parent companies, subsidiaries, associates and affiliates of the Condominium Residence Borgo al Sole), also in non-EU countries, for direct marketing purposes [Art. 6 par. 1 letter a) GDPR – User consent].
- h) Organisational, administrative, financial and accounting activities and user management [Art. 6 par. 1 letter b) and c) GDPR – fulfilment of contractual and legal obligations].

## **LEGAL BASIS FOR PROCESSING**

The data is processed by Gruppo Vinicolo Fantinel S.p.A., for the pursuit of the legitimate interest of the Data Controller to provide information on its Company to interested parties.

## **DATA PROCESSING LOCATION**

The processing connected to the web services of this site take place at the aforementioned office in 33097 Tauriano di Spilimbergo (PN), via Tesis 8, Italy and is only handled by technical staff of the Department in charge of processing. If needed, the data connected to the newsletter service can be processed by specific External Managers appointed pursuant to art. 28 of the GDPR regulation.

## **TYPES OF PROCESSED DATA**

The processing concerns the following types of data:

- Navigation data.

The computer systems and software procedures used to operate this website acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols.

This information is not collected to be associated with identified data subjects, but by their very nature could, through processing and association with data held by third parties, make it possible to identify users.

This category of data includes the IP addresses or domain names of computers used by users connecting to the site, the URI (Uniform Resource Identifier) addresses of the requested resources, the time of the request, the method used in submitting the request to the server, the size of the file obtained in response, the numeric code indicating the status of the response given by the server (success, error, etc.) and other parameters relating to the operating system and IT environment of the user.

This data is used only to obtain anonymous statistical information on the use of the site and to check its correct functioning and are deleted immediately after processing. The data could be used to ascertain responsibility in case of hypothetical computer crimes against the site: except for this case, at present the data concerning web contacts are not retained for more than seven days.

- Data provided voluntarily by the user.

The optional, explicit and voluntary sending of emails to the addresses indicated in this site entails the subsequent acquisition of the sender's address, necessary to respond to requests, as well as any other personal data included in the message.

Specific summary information will be progressively reported or displayed on the pages of the site set up for particular services on request.

- Cookies. **[ASSESS THE TYPE OF COOKIES WITH THE SITE MANAGER]**

No personal data of the user is acquired by the site through cookies.

Cookies are not used to transmit personal information, nor are so-called persistent cookies of any kind, or systems for tracking users, ever used.

The use of so-called session cookies (which are not stored permanently on the user's computer and disappear when the browser is closed) is strictly limited to the transmission of session identifiers (consisting of random numbers generated by the server) necessary for a safe and efficient navigation of the site. The so-called session cookies used on this site avoid the use of other computer techniques that are potentially detrimental to the privacy of users' browsing and do not enable the acquisition of personal data that identifies the user.

The cookies used by the site are as follows:

<b>Cookie name</b>	<b>Description</b>	<b>Type</b>	<b>Expiry</b>
ga	Used to distinguish users	Google Analytics	2 years
gid	Used to distinguish users	Google Analytics	24 hours
gat	Used to limit requests	Google Analytics	1 minute
DisplayNewsletter	Used to display or not the newsletter subscription form	Technical	7 days
cookieconsent_status	Used to determine whether the privacy notice has already been viewed in the browser	Technical	1 year
PHPSESSID	Used for correct navigation: active language	Technical for php session	Closing the browser

## **PROCEDURE FOR PROCESSING PERSONAL DATA**

Personal data is processed with automated tools for the time strictly necessary to achieve the purposes for which it was collected.

Specific security measures are applied to prevent the loss of data, its illicit or incorrect use and its unauthorised access.

## **RIGHTS OF THE DATA SUBJECTS**

Pursuant to current legislation, the data subject will be able to assert his or her rights with respect to the Data Controller, as expressed by art. 15 et seq. of EU Regulation 679/2016.

## **DATA CONTROLLER, POSSIBLE DPO AND PRIVACY COMMUNICATIONS**

The Data Controller is Gruppo Vinicolo Fantinel S.p.A. with registered office in 33097 Tauriano di Spilimbergo (PN), via Tesis 8, Tax Code and VAT number 0048630308, in the person of its chairman Dr. Marco Fantinel who, as Data Controller, provides the following address for any communication pursuant to the above articles of EU Regulation 679/2016: 33097 Tauriano di Spilimbergo (PN), via Tesis 8 Tel. +39 0427 591511 / Fax +39 0427 591529/539 email: [fantinel@fantinel.com](mailto:fantinel@fantinel.com).