STAE PRIVACY POLICY

STAE SRL complies with the data subject's privacy policy which could be found in this website or sent to it.

Privacy Policy

The privacy and the security of your information are very important to STAE SRL. In order to protect the privacy of the users of this website, please find below explanations concerning the data collected online and the many choices you have in gathering and using such data on the website.

This privacy policy applies, pursuant to Article 13 of Regulation (EU) 2016/679 (GDPR - General Data Protection Regulation) of the European Parliament and of the Council of April 27th, 2016 "regarding the protection of natural persons with regard to the processing of personal data and the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)", to anyone interacting with the web services of STAE SRL starting from the home page of the official STAE SRL website: <u>www.stae.it</u>.

This policy refers to the STAE SRL website only and not to other websites that may be reached by users via links appearing on this website.

This privacy policy also agrees, as specific legal reference, with the regulation of the Italian Data Protection Authority (Garante nazionale per la protezione dei dati personali) No. 229 of 8th May 2014 "Simplified arrangements to provide information and obtain consent regarding cookies – 8th May 2014", as published in the Gazzetta Ufficiale No. 126 of 3rd June 2014 and related explanations as stated in the link below:

http://www.garanteprivacy.it/web/guest/home/docweb/-/docwebdisplay/docweb/4006878

The purpose of this regulation is to identify a few minimum requirements needed to collect online personal data and, in particular, procedures, storage periods and types of information that the controller of data processing must supply the users when they connect to internet pages, whatever the purpose of the internet connection.

Data controller

By visiting this website, data related to identified or unidentified persons can be processed. STAE SRL is the data controller, in the person of its legal representative Mr. Mauro Friggieri. To get in touch with him please write to the addresses at the bottom of each page of the official website: info@stae.it.

Types of data processed

The information systems and software procedures relied upon to operate this website acquire personal data as part of their standard functioning; the transmission of such data is an inherent feature of internet communication protocols. This information is not collected

to be associated to identifiable users, but due to its very nature, it could allow to identify the users through processing and association with data held by third parties.

This data category includes the IP addresses and/or the domain names of the computers used by any user who brows this website, the URI (Uniform Resource Identifier) addresses of the requested resources, the time of such requests, the method used for submitting a given request to the server, returned file size, a numerical code relating to server response status (successfully performed, error, etc.), and other parameters related to the user's operating system and computer environment.

These data are essential for the sole purpose of checking the proper functioning of the website and extracting anonymous statistical information about the use of the website. These data may be used for assessment of liability in case of hypothetical cybercrimes damaging the website only if requested by the supervisory authority in charge.

Sending email messages, on the basis of the user's free, voluntary, explicit choice, to the addresses stated on this website, entail the acquisition of the sender's contact information – which is necessary to provide a reply – as well as of any other personal data communicated.

Data voluntarily provided by users

With the exception of what explained for browsing data, the user is free to submit the personal data required in the STAE SRL request forms to receive promotional material or other marketing communications. Not providing such data can result in the impossibility to obtain what required.

Children

In accordance with Article 8 of GDPR, no person below the age of 16 years, without prior consent given or authorised by parents or the holder of parental responsibility over the child, can send information to this website, purchase or modify legal acts on this website without the above-mentioned consent, unless otherwise permitted by the existing applicable laws.

Processing procedures

The processing of personal data shall be made by suitable electronic or automated means for as long as strictly necessary to fulfil the purposes for which they were collected. In accordance with Article 32 of GDPR, appropriate security measures will be taken in order to prevent data loss, illegal or improper uses and unauthorized accesses.

Data subject's rights

The data subject shall have the right to obtain at any time confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, to obtain access to the content and source (Article 15, GDPR "Right of access by the data subject"), the right to verify the accuracy as well as request addition, update or rectification of such data (Article 16, GDPR "Right to rectification"). Pursuant to GDPR, the data subject shall have the right to obtain the erasure or transformation into anonymous form (Article 17 "Right to erasure") or restriction or suspension (Article 18 "Right to restriction of processing") of personal data processed in breach of the law, as well as the right to withdraw his or her consent (Article 7 (3) " Conditions for consent") or opposition or objection for legitimate grounds (Article 21 "Right to object" and Article 77 " Right to lodge a complaint with a supervisory authority") to the processing of personal data concerning him or her.

For further information about the data subject's rights in accordance with the REGULATION (EU) 2016/679, please refer to the following link: Attached 1 "Data subject's rights".

Should data subjects have doubts regarding the protection of the privacy policy adopted by STAE SRL, its applications, the accuracy of their personal data or the usage of the collected information, they can contact the data controller in writing to the following email addresses: <u>info@stae.it</u> or <u>direzione@pec.stae.it</u> (certified email address).

Disclosure of personal information

With the exception of what stated in this privacy document, personal data will never be disclosed.

What are cookies?

Cookies are small text files (letters and/or numbers) that enable the web server to memorize on client (the browser) information to be reused during the current visit to the website (session cookies) or later on, for longer periods (persistent cookies). Cookies are memorized, on the basis of the user's preferences, by the browser on the specific device used (computer, tablet, smartphone). Similar technologies are used to collect information on users' behavior and their use of the services.

Throughout this document we will refer to cookies and all similar technologies by using simply the term "cookies".

Main cookie types

Based on the different features and uses, cookies can be identified in different categories.

Strictly necessary or functionality cookies

These cookies are essential for the proper functioning of the website and are used to manage the login and access "register area" of the website. They are mainly used to speed up, improve or customized the level of service to the users. Cookies retention period is strictly limited to the working session (once the browser has been closed, cookies are cancelled) or for longer retention, cookies are used to recognize the user's computer. Disabling these cookies can compromise the usage of the services accessible from the log in; while the availability of public contents is not affected by disabling the cookies.

Analysis and performance cookies

These cookies are used to collect and analyze the traffic and the use of the website into anonymous and aggregated form. For example, these cookies of first parties and third parties enable, without identifying the user, to detect if the same user repeatedly connects himself. They also monitor the system and improve both performance and usability. These cookies can be disabled without any loss of performance.

Profiling cookies

Profiling cookies are persistent and aimed at identifying (into anonymous and not anonymous form) users' preferences and improving their browsing experience in order to send advertising messages in line with the preferences shown by the users while browsing the web. Due to the invasiveness that these types of cookies can have on the private life of the users, Italian and European rules and regulations provide that web users must be adequately informed on the use of such cookies and express their valid consent.

Third party cookies

By visiting a website you can receive cookies both from the website you are visiting (website owner) and from websites managed by other organizations (third parties) through the first website. An example are the "social plugins" (like Facebook, Twitter, Google, etc.) whose final purpose is to share the contents on social networks. These social plugins imply the sending of cookies from and to all websites managed by third parties. The managing of information collected by third parties is ruled by the relevant policies we suggest you to refer to.

How to manage third party cookies

In order to guarantee maximum transparency, for the installation of every third party website accessed through this website, as well as the possible refusal of consent to cookie installation, please refer to the explanations and website address of the relevant cookie management policy.

Google Analytics

Google Analytics is a web traffic analytics service offered by Google used to monitor and improve the performance of the host website (performance cookies). Google Analytics can collect and analyze in anonymous form the information about usage behaviors. Google Analytics gathers and process this information to redact reports regarding the activities on the websites. This website, through the IP address of the user in anonymous form, does not use (and does not allow third party to use) the analysis tool of Google to monitor or collect personal identification data. Google does not bind the IP address to other data owned by Google nor tries to match an IP address with the identity of a specific user. Google may provide such information to third parties when required by the law or when these third parties deal with this information on behalf of Google.

For further information, please refer to the link below:

https://www.google.it/policies/privacy/partners/

Users can selectively disable the functioning of Google Analitics by installing on their browser the opt out component provided by Google. In order to disable Google Analytics please refer to the following link:

https://tools.google.com/dlpage/gaoptout?hl=it

Google Adwords

Google Adwords is a service provided by Google that allows to create advertising campaigns and tracks conversations to monitor page views and liking generated by an ads. For further information please refer to the following link:

https://www.google.com/intl/it/policies/technologies/ads/

Users can selectively disable the functioning of Google Adwords by installing on their browser the opt out component provided by Google. In order to disable Google Adwords please refer to the following link:

http://www.google.com/settings/ads

For all third party cookies

Should it be particularly difficult to identify all third party cookies, mainly for preference profiling, please refer to the following links:

http://www.networkadvertising.org/choices/ http://www.youronlinechoices.com/it/ http://www.aboutads.info/choices

How to disable cookies in the browser

Users may decide whether they want to accept or not cookies by using their browser setting area.

WARNING: Total or partial technical cookies disabling may affect the proper functionality of the website for registered users. On the contrary, the availability of public contents is not affected by disabling the cookies. Disabling third party cookies does not affect browsing at all. Setting can be separately defined for different websites and web applications. Furthermore the best browsers allows to define different settings for the owner cookies and for third party" cookies.