

INFORMATION LETTER ON THE PROCESSING OF PERSONAL DATA

*(Ex art. 13 – 14 EU reg. 2016/679 and Legislative Decree 196/2003 in the light of
Legislative Decree 101/2018)*

Dear Interested,

below we provide you with some information that you need to bring to your knowledge, not only to comply with the obligations set out in EU Reg. 2016/679, but also because transparency and fairness towards the interested parties are a fundamental part of our business.

The Data Controller of your personal data is **PALLADIO GROUP** responsible towards you for the legitimate and correct use of your personal data and who you can contact for any information or request at the following contact details:

Data Controller: **PALLADIO GROUP IN THE PERSON OF THE PARENT COMPANY
PALLADIO GROUP SPA**

Headquarters: Via Cresole n. 8, 36031 Dueville (VI), IT

Contacts and contact details:

Telephone	+39 0444 947111
E-mail	info@palladiogroup.com
Website	www.palladiogroup.com

Data Protection Officer (DPO):
dpo@palladiogroup.com

The Data Controller guarantees the security, confidentiality and protection of the data in his possession, at any stage of the processing process. The data collected are used in compliance with current legislation on privacy (GDPR 679/2016). Personal data can be brought to the attention of those authorized to process them and can be communicated to collaborators and/or other subjects with respect to whom communication is necessary for the provision of services, for technical support of IT/telematic services and server conservation. The data provided by the user may be communicated to subjects for whom there is an obligation to communicate pursuant to the law or a need for communication to assert a just right of the data controller with the competent bodies.

PURPOSE OF THE PROCESSING

The computer systems and software procedures that regulate the functioning of this site acquire navigation data.

- IP addresses or domain names of the computers used by users who connect to the site;
- time of the request;
- method used in submitting the request to the server;
- numeric code indicating the status of the response given by the server (successful, error, etc.);
- other parameters relating to the operating system and browser used by the user.

The data that users voluntarily provide through this site by means of calls, emails, forms, chats and navigation on the site, are processed for the purpose of allowing access to products, services and contents, as well as to perform the service or provision of requested. With regard to some specific services, and subject to the informed consent of the data subject, the Data Controller may also use such data to carry out sales or placement of products and services and to develop studies and market research. In any case, the acquired data could be used to ascertain responsibility for hypothetical crimes, including computer crimes, against the site.

PERSONAL INFORMATION THAT WE COLLECT

On each occasion of contact or interaction with the visitor, some personal information may be collected, such as:

- Name;
- Surname;
- City;
- Country;
- Company;
- Telephone;
- Email;
- Message;
- Any other data that may be provided to us voluntarily by the user.

Apart from what is specified below regarding navigation data, the user is free to provide his personal data, while failure to provide them can only cause the impossibility of obtaining what has been requested.

INFORMATION THAT WE COLLECT FROM THIRD PARTIES

While browsing, we collect standard access information and details of user behavior patterns. These data are used, for example, to obtain information on the number of visitors who browse the various sections of the site and, subject to collection of consent from the interested party, for marketing and user profiling activities.

RETENTION PERIOD

In compliance with the principles of proportionality and necessity, no data will be kept for periods longer than those necessary for the achievement of the purposes indicated above and, therefore, for the service offered or for specific legal provisions.

The data that are collected through cookies, referred to in the specific information that follows, will be stored according to their nature: session cookies will expire when the user closes the browser, persistent cookies have typical expiration dates.

The user, however, may at any time request the interruption of the processing or the cancellation

and/or limitation of the data.

DATA TRANSFER OUTSIDE EU

The processing of personal data (e.g. storage, archiving and conservation of data on its own servers or in the cloud) will be limited to the areas of circulation and processing of personal data in countries belonging to the European Union, with the express prohibition of transferring them to countries outside the EU that do not guarantee (or in the absence of) an adequate level of protection, or, in the absence of protection instruments provided for by EU Regulation 2016/679 (third country deemed adequate by the European Commission, group BCR, model contractual clauses, consent of interested parties, etc.). The data may be transferred to recipients based in the USA (*Google LLC for user profiling activities for commercial purposes and for optimizing page display*).

RIGHTS AND REVOCATION OF CONSENT

The GDPR 679/2016 recognizes some rights TO the interested party:

- art. 15 - right of access to collected and processed data;
- art. 16 - right to obtain rectification of data;
- art. 17 - right to obtain the cancellation of data and right to forget them;
- art. 18 - right to obtain the limitation of the treatment;
- art. 20 - right to data portability to another data controller;
- art. 21 - right to oppose the processing;
- art. 22 - right not to be subjected to automated processing;
- art. 7 - right to revoke the consent at any time, without prejudice to the lawfulness of the treatment based on the consent given before the revocation;
- art. 77 - right to lodge a complaint with the Supervisory Authority.

The exercise of the aforementioned rights can be practiced by sending a request by e-mail to the contact details of the Data Controller.

Additional information regarding the processing of Personal Data can be requested at any time from the Data Controller using the contact information.

CHANGES TO THIS PRIVACY POLICY

The Data Controller reserves the right to make changes to this privacy policy at any time, notifying Users on this page. Visitors are therefore invited to consult this page often, keeping as a reference the date of the last modification indicated at the bottom. In case of non-acceptance of the changes made to this privacy policy, the User is required to immediately stop using this site and can request the Data Controller to remove his Personal Data.

Unless otherwise specified.

CHILDREN BELLOW 14 YEARS OF AGE

Our website is aimed at a general public and does not offer any services dedicated to children. If we become aware of personal data of a minor under the age of 14, provided by him without the authorization of the parents or any guardian, we will eliminate such information immediately.

COURT DEFENSE

The User's Personal Data could be used for the defense in court by the Data Controller or in the preparatory stages for its eventual establishment, against abuses in the use of the same or related services by the User. As a result of a subpoena, court order or other legal action; in order to establish or exercise the rights recognized by law to the Data Controller; to protect in the event of legal action against the Data Controller or for other purposes dictated by law.

The User declares to be aware that the Data Controller may be required by public authorities to disclose Personal Data.

last update on 18 February 2022

COOKIE POLICY

Web cookies can be defined as small text strings that the sites visited by the user send to his terminal (typically the browser), where they are stored before being re-transmitted to the same sites on the next visit by the same user. The Data Controller of this site declares that he uses cookies and/or other similar IT tools in order to allow and optimize the display of web pages and the elements contained therein, for marketing and/or profiling purposes as well as to process anonymous visitor statistics and protect the site from malicious activity and spam.

The information collected with these tools may concern, for example:

- a) the type of browser used (for example, Internet Explorer, Google Chrome; Firefox, etc.);
- b) the name of the site from which the user accesses the internet;
- c) the website from which the user reached the site;
- d) the date, time and area of access;
- e) the pages that have been visited.

We guarantee that this website DOES NOT use its own cookies for profiling, advertising or geo-location purposes or other similar IT tools for the purpose of acquiring user data for mere advertising purposes.

In any case, the user can define various options relating to cookies, modifying the navigation options of his browser, respecting the methods and limits granted by the same.

The modification of the browser parameters can be carried out normally by selecting the item: "Internet Options" or "Preferences" from the "Tools" or "View" or "Edit" menu and, subsequently, selecting the wording: "Privacy" or "Protection" or "Download Files", and, subsequently, choosing the preferred settings. Given the multiplicity of browsers currently in use, it will certainly be advisable to refer to the specific instructions and specific manuals of each program for surfing the net.

This site uses cookies aimed at collecting user navigation data (cookie analytics) with the use of Google Analytics, taking care to implement procedures and configurations capable of reducing the identification power; moreover, in order to offer the user a better browsing experience, additional IT tools could be installed on the user's computer (exclusively by third parties) also for profiling, advertising or geo-location purposes, attributable to the following third parties:

_ga	palladiogroup.com	Analytics	The _ga cookie, installed by Google Analytics, calculates visitor, session and campaign data and also tracks site usage for the site's analytical report. The cookie stores information anonymously and assigns a	2 years
-----	-------------------	-----------	---	---------

			randomly generated number to recognize unique visitors.	
_gid	palladiogroup.com	Analytics	Installed by Google Analytics, _gid cookie stores information on how visitors use a website, also creating an analytical report on website performance. Some of the data collected includes the number of visitors, their source and the pages they visit anonymously.	1 day
_gat_UA-	palladiogroup.com	Analytics	A variant of the _gat cookie set by Google Analytics and Google Tag Manager to allow website owners to track visitor behavior and measure site performance. The pattern element in the name contains the unique identity number of the account or website it refers to.	1 minute
_GRECAPTCHA	www.google.com	Necessary	This cookie is set by the Google recaptcha service to identify bots and protect the website from malicious spam attacks.	180 days

With reference to the specific function, information and consent relating to cookies installed by the aforementioned third parties, we invite the user to visit the site: <http://www.youronlinechoices.com/it>

Attention: by modifying the parameters relating to privacy and/or the display of cookies, limitations may occur in the display or in the functions offered by this site!