

SAMMONTANA ITALIA

Dear User,

welcome to our website (hereinafter also referred to as the "**Site**").

SAMMONTANA ITALIA S.p.A. Società Benefit (hereinafter also referred to as "**Sammontana Italia**") has always been committed to protecting the personal data it processes. Sammontana Italia invites you to carefully read this Privacy Policy, drawn up in accordance with Article 13 of EU Regulation 2016/679 (hereinafter also referred to as the "**Regulation**" or "**GDPR**"), which outlines Sammontana Italia's policy with regard to the processing of personal data collected while you navigate the website and/or following the use of the services offered.

We inform you in advance that your personal data will be processed in accordance with the national and European data protection legislation currently in force and in accordance with the principles of fairness, lawfulness, transparency and protection of your privacy and rights.

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1. Data Controller

Data Controller is SAMMONTANA ITALIA S.p.A. Società Benefit, headquartered in Via Tosco Romagnola n. 56, 50053 Empoli (FI), telephone: 0571 7076, e-mail: privacy@sammontanaitalia.com, certified e-mail: sammontana@legalmail.it

2. Types of personal data processed

Sammontana Italia collects and processes personal data (hereinafter collectively referred to as "**Personal Data**" or simply "**Data**") regarding the User and more specifically:

- Navigation data: the computer systems and software procedures used to operate the Website collect some personal data as part of their standard operation, the transmission of which is implicit in the use of the Internet communication protocols.

Such information is not collected in order to be associated with identified data subjects; however, because of its very nature, it might allow the identification of users after being processed and matched to data held by third parties. This category of data includes, among other things, the IP addresses and computer domain names used by users who connect to the website, the URI (Uniform Resource Identifier) addresses of requested resources, the time of the request, the method used to submit the request to the server, the size of the file obtained in reply, the numerical code indicating the status of the server response (successfully performed, error, etc.) and other parameters associated with the user's operating system and computer environment.

These data are not intended to be disclosed and are only used to obtain anonymous statistical information on Website usage and to check its proper functioning. They are retained for the time required in accordance with applicable legislation. These data might be used to establish liability in case of alleged computer crimes committed against the Website.

- Data provided voluntarily by the User when filling out online forms: personal identification data and contact details, for example first name, last name, address, telephone number, email address, birth date.
- Cookies: the Website uses automatic data collection systems that acquire data, such as cookies, which are not directly provided by the User. A cookie is actually a reminder of the Internet page visited: it contains small bits of information that can be recorded on the User's computer when the browser calls up a particular website. In this way, the website can automatically adapt to the user, for example by sending content in a format compatible with the browser used or with specific display settings (style, colour, etc).

Depending on their characteristics and functions, different types of *cookies* can be stored on a computer for varying periods of time.

This Website uses the following types of cookies:

- **necessary technical cookies** - they are used for the sole purpose of carrying out the transmission of certain information on an electronic communication network, to ensure the proper display of the website and to facilitate navigation within it, or to provide services explicitly requested by the user;
- **analytical cookies** - they are used to collect anonymous statistical data on the use of the website in order to make a statistical analysis of traffic and visits to the site and optimize its functioning;
- **profiling cookies** - they are used to trace specific actions or recurring behavioural patterns in the use of available functionalities (patterns) back to specific, identified or identifiable individuals for the purpose of grouping the different profiles within homogeneous, multi-sized clusters. The aim is to enable the Data Controller to send targeted advertising messages, i.e. messages in line with the preferences shown by the User while surfing the Internet.

Cookies can also be classified according to their origin:

- **first-party cookies**, i.e. cookies directly generated and managed by the administrator of the website that the user is browsing;
- **third-party cookies**, i.e. cookies generated and managed by entities other than the administrator of the website that the user is browsing.

For further details, please refer to the "[Cookie policy](#)".

3. Purposes and methods of data processing

The Personal Data voluntarily provided by the User by filling out the online forms are collected and processed for the following purposes:

A) to be contacted by the Data Controller and/or to receive a reply to the message sent to Sammontana Italia (via the "Contact Us" button on the Website);

B) for direct marketing purposes by the Data Controller, in particular:

- a) to send information and promotional material relating to products and services as well as to future promotional and advertising initiatives of the Data Controller, by postal mail, including electronic mail, text messages and other instant messaging systems;
- b) to send newsletters and information of commercial nature, promotional and advertising material (for example brochures, catalogues, samples, newsletters, emails, etc.), material relating to marketing campaigns and events, to submit questionnaires for market research purposes, also via email, text messages and other instant messaging systems containing information on products, events or promotions;
- c) to use data in anonymised and/or pseudonymised form for market research and statistical analysis of consumers' responsiveness to prize-winning events, meaning initiatives by manufacturers and retailers to stimulate purchases, boost sales, promote the corporate image and reward consumers (hereinafter also referred to as "Contests and/or Sweepstakes") - conducted by the Data Controller, as well as for an analysis of consumption habits and/or propensity to consume and, possibly, the creation of profiles of anonymous clusters of consumers with common characteristics (age, geographical area of residency, etc.);
- d) to contact you and provide updates on new initiatives by Sammontana Italia, including notices, special offers and promotional material announcing new editions of the afore-mentioned Contests and/or Sweepstakes or other similar initiatives by postal mail, including e-mail, text messages and other instant messaging systems.

C) to send you Sammontana Italia's *newsletter* ("Subscribe to our Newsletter" button of the Website);

D) to fulfil obligations provided for by law (including accounting, administrative, tax, legal requirements, etc.) and handle disputes and possible litigation.

Personal Data will be processed by Data Controller, Data Processors and persons in charge of processing ("**Authorized Persons**" or "**Persons in Charge**"); they shall adopt all appropriate measures to ensure their security and confidentiality, by means of paper-based or computer-based tools, (among which the management and use of a database marketing programme), in accordance with the principles of the law, protecting the confidentiality of the data subjects and their rights by adopting appropriate technical and organizational measures to ensure a level of security commensurate with the risk.

4. Legal basis for processing personal data

The legal basis for processing personal data for the purposes set out in section 3, letters A), B) and C) is your consent freely given pursuant to Article 6, paragraph 1 letter a) of the Regulation.

The legal basis for processing personal data for the purposes set out in section 3, letter D) is to comply with a mandatory requirement which the Data Controller is subject to and/or to pursue the legitimate interests of the Data Controller pursuant to article 6, paragraph 1, letters c) and f) of the Regulation.

5. Recipients/Categories of Recipients of Personal Data

Your Personal Data may be disclosed, exclusively for the above-mentioned purposes, to the following categories of recipients:

- individuals, companies, associations or professional firms which provide assistance and consulting services to our Company, typically, but not exclusively, in the areas of accounting, legal, tax and financial matters; Internet service providers, providers of cloud or IT services, Website administrators, who need to access your Data for purposes related to your request to be contacted by Sammontana Italia, and all attendant activities, to the extent strictly necessary for the performance of their duties;
- subsidiary companies, companies within the same Corporate Group to which Sammontana Italia belongs;

- individuals whose right to access your Personal Data is recognized under applicable laws and secondary regulations;
- public or private entities that manage ordinary and commercial mail delivery services;
- other individuals who may become aware of your Personal Data, such as members of our staff involved in the operations performed to fulfil your contact requests.

These individuals/entities shall act as Authorized Persons, autonomous Data Controllers or Data Processors within the meaning of Article 28 of the EU Regulation. These individuals or entities, which Sammontana Italia relies upon to carry out its activities, provide suitable guarantees of compliance with the personal data processing regulations in force.

Your Personal Data will not be transferred to Countries outside the EU.

Your Personal Data will in no case be disclosed.

6. Data collection and consequences of withholding data

The input of your Personal Data marked with an asterisk (*) on the online forms available on the Website is not mandatory but necessary to fulfil the purposes stated in section 3, letters A) and C).

The sole consequence of withholding any of these data is the inability to register with the Website, to be contacted by the Data Controller and/or to receive a response to your message, to receive Sammontana Italia's newsletter or to participate in Contests and/or Sweepstakes promoted by the Data Controller.

The input of Personal Data not marked with an asterisk (*) (i.e. Personal Data provided for the purposes stated in section 3, letter B) and the Personal Data requested on the online forms available on the Website) is optional.

If you choose not to provide such Data, there will be no consequences with regard to the implementation of the services offered by the Data Controller.

7. Withdrawal of consent

You may at any time withdraw your consent previously provided to us for the purposes stated in section 3, letters A), B) and C). Such withdrawal will not affect the lawfulness of processing carried out prior to your consent being withdrawn. In order to revoke your consent to data processing, please submit your request for withdrawal to the Data Controller via registered letter, fax or email to the addresses and contact information reported in section 1 of this privacy policy.

8. Data retention period

The Data referred to herein shall be retained for as long as is necessary to achieve the purposes stated in section 3 and, in any case: (i) until completion of the activities connected with your contact request for the purposes stated in section 3, letter A); (ii) for a period of 60 months for the purpose stated in section 3, letter B), unless you withdraw your consent, in which case Sammontana Italia will promptly delete your Personal Data; (iii) until you withdraw your consent for the purposes stated in section 3, letter C); (iv) for the purposes stated in section 3, letter D), for the time that is strictly necessary to complete the relevant activities.

9. Rights of Data Subjects

You are entitled at any time to exercise your rights against the Data Controller pursuant to articles 15 and following of the Regulation, which are reported below for your convenience:

- **Right of access and rectification** (articles 15 and 16 of the Regulation): you are entitled to obtain confirmation of whether or not your Personal Data is being processed and, if so, to access your data. You also have the right to

request the rectification of incorrect data and the integration of incomplete data. If you wish, we may provide you with a copy of your Data in our possession.

– **Right to erasure** (article 17 of the Regulation): in the cases provided for by applicable legislation (for ex. personal data is no longer necessary for the purposes for which it was collected or processed, withdrawal of consensus, unlawful processing, etc.) you may request the erasure of your Personal Data, which Sammontana Italia will do without delay.

– **Right to restriction of processing** (article 18 of the Regulation): in the cases provided for by applicable legislation (inaccurate personal data, unlawful processing of data, etc.), you are entitled to obtain a restriction of your Personal Data processing.

– **Right to data portability** (article 20 of the Regulation): you are entitled to receive your Data in a structured, commonly used and machine-readable format in order to transmit it to another data controller. Alternatively, if requested, we will directly transmit your Data to another data controller.

– **Right to object** (article 21 of the Regulation): you have the right, at any time, to object to the processing of your Personal Data on grounds relating to your particular situation pursuant to Article 6, paragraph 1, letters e) or f) of the Regulation, including profiling based on those provisions (legitimate interest of the Data Controller).

You may exercise these rights by contacting the Data Controller via registered letter, fax or email to the addresses and contact information reported in section 1, possibly using the forms made available on the website of the Italian Data Protection Authority (*Autorità Garante per la Protezione dei dati personali*) (www.garanteprivacy.it).

Upon receipt of your request, Sammontana Italia shall have one month time to take all necessary actions. Within this period, notwithstanding the exercise of your rights, you may receive further automated messages, the transmission of which had been planned prior to your request.

The one-month deadline may be extended by two months in case of a complex request or a large number of requests.

10. Filing a complaint with the Italian Data Protection Authority

If you believe that there has been a violation of your rights to personal data protection, you can file a complaint with the Italian Data Protection Authority (*Garante per la protezione dei dati personali*) in the manner and within the terms specified on the website of the Italian Data Protection Authority (www.garanteprivacy.it).

11. Personal Data of minors

The services of this Website are intended for a general audience and are not targeted to individuals under the age of 18. We will not knowingly collect personal information from users below this age limit. Should we become aware that we have collected personal data belonging to a person under the age of 18, the Data Controller will promptly delete such data.

12. Updates and amendments

The Data Controller may modify, supplement, or simply update, in whole or in part, this Privacy Policy, also to reflect changes in regulations or following the introduction of new sector-specific standards.

Any such updates or amendments will be notified through publication on the Website.

We recommend, therefore, that you regularly access this section to check the publication of the most recent and updated Privacy Policy.

13. Links to other websites

This Privacy Policy is provided for this Website and for the other websites of the Data Controller and is not applicable to other external websites that may be accessible through links.

14. Interacting with social networks

The Website allows you to interact with social networks directly from its pages through so-called social buttons, i.e. special links displaying the icons of Facebook, Twitter, Instagram and YouTube. These buttons allow users browsing the website to easily connect to and engage with social platforms with a single click, enabling these platforms to acquire data related to your visit.

For additional information, please consult the privacy policies of the respective social networks.

15. Co-processing of statistical data with Meta

This Privacy Policy also applies to the webpage <https://www.facebook.com/GelatiSammontana> for which Sammontana Italia is a joint data controller for statistical data, together with Meta Platforms Ireland Limited.

The personal data processed are statistical data obtained through the Insight feature of the Facebook page, which provides aggregate data that helps understand how people interact with the pages of the social network. Through this [link](#) you can access the Facebook page section entitled "Data controller addendum for Facebook page Insights" which outlines the allocation of responsibilities between Meta Platforms Ireland and the user (in this case Sammontana Italia) as the administrator of the page <https://www.facebook.com/GelatiSammontana>.

Please consult [this page](#) for information on Facebook data policies, including the following:

- Type of information collected by Meta
- How Facebook uses this information
- How this information is shared
- How Meta companies collaborate
- Legal bases for data processing
- How to exercise rights under GDPR
- Data retention period, account deactivation and deletion
- How to comply with legal requirements
- Data management and transfer within global services
- Updates and amendments to the policy
- Contact information for Meta Platforms Ireland for issues regarding personal data protection

[This page](#) also includes information about Meta Platforms Ireland's cookie policy.

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SAMMONTANA ITALIA S.p.A. Società Benefit