PRIVACY POLICY

Information Notice pursuant to *Articles 13 and 14 of EU Regulation 2016/679* (Rev.5.0 Upd. 09/02/2026)

This page describes the management methods of the website with reference to the processing of personal data of users who consult it or benefit from the services offered therein.

This information notice is provided solely for this website and does not apply to any other websites that the user may consult via *links.*

INDEX

THE DATA CONTROLLER (the entity that decides why, how, and by whom the data are processed) 2

DATA SUBJECT RIGHTS 2

NAVIGATION DATA – data processed in connection with website visits 2

DATA PROVIDED VOLUNTARILY BY THE USER 3

Processing resulting from a contact request - 3

BOOK ONLINE ("RATES", "OFFERS", AND "FIND OUT MORE" BUTTONS) 4

Mailing List Subscription - Newsletter 5

DATA RETENTION 6

"WORK WITH US" SECTION 6

IMPORTANT INFORMATION 6

COOKIES 9

COOKIES - IN DEPHT ANALYSIS 9

DISABLING AND DELETING COOKIES 10

Disabling COOKIES ON MOBILE DEVICES 11

USER RIGHTS - IN DEPTH ANALYSIS 11

KEY DEFINITIONS 13

This document has been prepared for the use of Arranger Consulting s.r.l. Any copying or use, even partial, by individuals or entities not authorized by current legislation or express consent, is strictly prohibited.
Reproduction is permitted only if this footer is included in its entirety

THE "DATA CONTROLLER" (the entity that determines the purposes, means, and recipients of the data processing)

Following the consultation of this website and the use of the services offered therein, data relating to identified or identifiable persons may be processed. In addition to navigation data, information may be collected, for example:

As further specified below, in addition to navigation data, information may be collected, for example:
> In the event of contacts and requests for information submitted by users
> through the use of cookies or other technologies, as further specified in the Cookie Policy
Data Controller (i.e., the entity that determines the purposes and means of the processing of personal data and assumes responsibility for correctly processing and ensuring the correct processing of personal data) is the Company that manages RIVA DEGLI ETRUSCHI:

Arranger Consulting S.r.l. with registered office in Florence, Via Pico della Mirandola 8, VAT No. 06141820487, hereinafter also simply referred to as *RIVA DEGLI ETRUSCHI*

DATA SUBJECTS' RIGHTS

With reference to the processing operations described in this document, the data subjects (website users) have the right:

> to request from the Data Controller access to their personal data and the rectification or erasure thereof, or the restriction of processing concerning the data subject, and to object to the processing;
> if the processing is carried out by automated means (IT) and based on their consent, **to receive the personal data** concerning them in a structured, commonly used, and machine-readable format, and/or to obtain the direct transmission thereof to another Data Controller, where technically feasible;
> to withdraw their consent at any time (without affecting the lawfulness of processing based on consent before its withdrawal), naturally for processing operations carried out on such legal basis;
> to lodge a complaint with a supervisory authority: *Garante per la protezione dei dati personali* - Piazza Venezia n. 11, 00187 ROME - *https://www.garanteprivacy.it/web/guest/home*

Further information is provided at the end of this policy.

To exercise their rights, the Data Subject may contact the Data Controller through the contact details provided in the "CONTACT US" section, specifying the nature of the request or the issue identified. Please note that it will not be possible to respond to requests where there is no absolute certainty regarding the identity of the applicant, which the Data Controller is legallyed obliged to verify.

NAVIGATION DATA – data processed in relation to website visits.

The computer systems and software procedures used to operate this website acquire, during their normal operation, certain 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 its very nature, through processing and association with data held by third parties, it could allow for the identification of users.

This category of data includes, for example: IP addresses or domain names of the computers used by users connecting to the site; URI (Uniform Resource Identifier) addresses of the requested resources; the time of the request; the method used to submit the request to the server; the size of the file obtained in response; the numerical code indicating the status of the response given by the server (successful, error, etc.); and other parameters relating to the user's operating system and IT environment, such as browser type and version, browser plug-in types and versions, mobile device identifiers (IDFA or Android ID), and other parameters concerning your operating system and computing environment.

In the absence of specific consent for processing for further purposes, these data may be used for the sole purpose of obtaining anonymous statistical information on the use of the site and to monitor its correct operation.

This document has been prepared for the use of Arranger Consulting s.r.l. Any copying or use, even partial, by individuals or entities not authorized by current legislation or express consent, is strictly prohibited.
Reproduction is permitted only if this footer is included in its entirety

These data may be used to ascertain liability in the event of hypothetical cybercrimes against the website; only in such cases may specific procedures be initiated to identify the perpetrator.

The LEGAL BASIS FOR THE PROCESSING of these data is the legitimate interest of the Data Controller and the technical website manager, consisting of data security protection, proper website operation, and the improvement of service standards.

METHODS AND PARTIES AUTHORIZED TO PROCESS DATA

Personal data are processed by automated tools for the time strictly necessary to achieve the purposes for which they were collected. The processing operations related to the *web* services of this website are managed by personnel authorized by the Data Controller, as well as by external parties, appointed as **Data Processors**, who are entrusted with the technical management and maintenance of the website and the related IT systems. Specific security measures are observed to prevent data loss, illicit or incorrect use, and unauthorized access.

NO DATA DERIVING FROM THE *WEB* SERVICE IS DISSEMINATED.

DATA PROVIDED VOLUNTARILY BY THE USER

Apart from what is specified above, the user is free to provide the personal data requested during navigation to solicit the sending of informative material or other communications. Failure to provide such data may result in the impossibility of obtaining what has been requested. When the user visits a part of the Site that involves the collection of personal data, a link to this information document is presented again, and the user is asked to attest to having read it and, if necessary, to provide consent. The optional, explicit, and voluntary sending of e-mails to the addresses indicated on this site involves the subsequent acquisition of the sender's address, which is necessary to respond to requests, as well as any other personal data included in the message which, unless otherwise duly communicated, will be kept for the time necessary to satisfy the requests themselves. Specific information notices are provided below regarding the pages prepared for particular services upon request or through which it is possible to acquire further personal data.

Processing resulting from a contact request -

- The personal data provided voluntarily by the data subject through the contact areas and/or the e-mail addresses made available on the site are processed using mainly automated tools for:
  - to ensure a certain and timely response and to satisfy the requests of the data subject (*legal basis for processing: legitimate interest and consent of the data subject in the case of "special" categories of personal data);*
  - o comply with obligations deriving from laws, standards, and community regulations; compliance with provisions issued by the Judicial Authority (*legal basis for processing: coinciding with the purpose);*
  - to feed the system for acquiring public knowledge through statistical analyses, carried out using anonymized and aggregated data, useful for the verification, improvement, and therefore design of an increasingly efficient service (*legal basis for processing: legitimate interest of the controller coinciding with the purpose).*
- The contact details and e-mail addresses provided may be used for sending courtesy communications and/or informative material relating to the activities of the Data Controller, only where the following legal bases are applicable:
  - *legitimate interest consisting in processing personal data for direct marketing purposes, taking into account the relationship with the data subject [Art. 6(1)(f) of EU Regulation 2016/679] where the requested contact is related to or involves the establishment of an ongoing relationship with the Data Controller;*
  - *consent of the data subject [Art. 6(1)(a) of EU Regulation 2016/679] which, in the event of interest, the Data Controller will request during the contacts aimed at satisfying the data subject's requests;*

  it is understood that the data subject shall, in any case, have the right to object to such processing at any time*;*

This document has been prepared for the use of Arranger Consulting s.r.l. Any copying or use, even partial, by individuals or entities not authorized by current legislation or express consent, is strictly prohibited. Reproduction is permitted only if this footer is included in its entirety

- ⇨ The data may be processed by sales staff, personnel in charge of maintaining IT systems whose task is to guarantee system functionality, data security, and backup operations, other authorized personnel within the limits of their assigned duties and as provided for by company procedures, and other entities providing services for purposes auxiliary to satisfying the data subject's requests, also within the limits strictly necessary to perform their tasks;
- ⇨ he data may be communicated or made available:
    - to entities that can access the data by virtue of a provision of law, regulation, or community legislation, within the limits provided by such norms;
    - to other associated companies (subsidiaries – parent companies – companies under common control) always for *current administrative-accounting purposes* related to satisfying the data subject's requests;
    - to other entities that provide services for purposes related to satisfying the data subject's requests, within the limits strictly necessary to perform their tasks – commercial partners, whose collaboration is necessary for the provision of the requested services. Commercial Partners will operate as autonomous data controllers and in compliance with their respective privacy policies, which will be made available by them.
- ⇨ Personal data will be transferred to entities located outside the European Economic Area toward the Country in which the data subject resides or is located, exclusively if necessary to satisfy their requests and in compliance with current legislation.

When filling out the forms, the fields for which completion is mandatory are indicated; in the absence of such data, it will not be possible to satisfy the data subject's requests.

When filling out the forms, the fields for which completion is mandatory are indicated; in the absence of such data, it will not be possible to satisfy the data subject's requests. Should the data subject communicate special categories of data at the time of the contact request (such as: personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as the processing of genetic data, biometric data intended to uniquely identify a natural person, data relating to health or a person's sex life or sexual orientation), specific consent for their processing may be requested, in the absence of which it may be impossible to process the data subject's requests.

IMPORTANT NOTICE:

Users are invited to pay particular attention to including in the communications sent exclusively information of which they have full availability, having informed any third parties to whom such information refers.

BOOK ONLINE (BUTTONS “RATES” “OFFERS” AND “FIND OUT MORE”)

This is the page of the site through which the user can book stays at the Controller's accommodation facilities. In order to offer the best service with the highest security standards, the management of the service has been fully entrusted to a specialized company in the sector with proven experience and reliability, a leader in technology and support for Internet and GDS distribution in the tourism and hospitality sector. The "CHECK AVAILABILITY" link leads to a page on the website ***https://booking.rivadeglietruschi.it/book/home*** by Zucchetti Hospitality S.r.l. (*https://www.bookingexpert.com*), which is fully entrusted with the online booking procedure and has been appointed for this purpose as Processor pursuant to Art. 28 of European Regulation 2016/679; further information can be found through the links at the bottom of the booking area. The data entered by the user at the time of the booking request will be entered by Booking Expert directly into the Hotel's management software. Once transmitted to the Hotel, the data may be processed by administration staff, reception staff, or other personnel authorized by the Controller to register the booking, fulfill contractual, accounting, and fiscal obligations, and offer the guest attentive and personalized services by satisfying their requests.

PROCESSING RESULTING FROM THE SUBMISSION OF A BOOKING

This document has been prepared for the use of Arranger Consulting s.r.l. Any copying or use, even partial, by individuals or entities not authorized by current legislation or express consent, is strictly prohibited.
Reproduction is permitted only if this footer is included in its entirety

The data provided by the data subject, or by a third party acting on their behalf, will be processed mainly using IT and/or electronic tools for the following purposes:

a) to comply with obligations deriving from laws, standards, and community regulations, including the obligation relating to the communication of guests to the Public Security Authorities as provided for by Art. 109 of Royal Decree 773 of June 18, 1931, and subsequent amendments, which will be carried out after check-in; (*legal basis: coinciding with the purpose)*
b) to fulfill contractual, accounting, and fiscal obligations; performance of services requested by the data subject or by third parties on behalf of the data subject. (*legal basis: coinciding with the purpose)*
c) to offer the guest attentive and personalized services throughout the period of their stay within our facility; (*legal basis: legitimate interest consisting of the correct organization and planning of activities and the improvement of its service)*
d) purposes related to public relations, information, and commercial activities. In particular, the contact details and e-mail addresses provided may be used to send courtesy communications and/or advertising material relating to services similar to those subject to the existing commercial relationship. It is understood that the guest has the right to object to said processing at any time (*legal basis: legitimate interest consisting in processing personal data for direct marketing purposes, always taking into account the reasonable expectations of the data subject based on their relationship with the Data Controller*)
e) to assert or defend a right, also by using proxies with representation, whether in extrajudicial, administrative, or jurisdictional settings (*legal basis: coinciding with the purpose)*

For the same purposes, the data may be processed, always and only within the limits of what is strictly necessary to perform their functions, by the following categories of authorized personnel and/or processors: Company management; administration staff, reception staff, resources in charge of the management/maintenance of IT systems, and finally Associated Companies or other entities (companies/professionals), appointed for this purpose as Processors, who need to access certain data for purposes auxiliary to the above, always within the limits strictly necessary to carry out the tasks delegated to them.

Personal data relating to guests may be communicated:

> limited to data of an accounting and fiscal nature, to banks, credit institutions, data processing companies, and credit card issuing companies, for activities strictly connected to the execution and administrative management of the contract.
> to the Public Security Authority or Public Bodies in compliance with legal regulations
> to insurance institutions, public bodies, and agencies for the purpose of fulfilling legal obligations
> to other entities that need to access certain data to perform activities auxiliary to the purposes mentioned above, always within the limits strictly necessary to carry out the tasks delegated to them, such as: fiscal, accounting, welfare, and insurance fulfillments, information systems management, and financial services;

Naturally, all the communications described above are limited only to the data necessary for the recipient Entity/office to perform its tasks and/or to achieve the purposes related to the communication itself. The processing of the data in question may also consist of their communication abroad, both within and outside the European Union toward the guest's country of origin or destination and limited to the strictly necessary data, in relation to the specific requests of the guest. The transfer will always be carried out in full compliance with the regulations and may be carried out exclusively upon the occurrence of the legal requirements mentioned above.

The data will not be disseminated.

Mailing List Subscription- newsletter

The personal data provided voluntarily by the data subject by subscribing to our mailing list/newsletter:

> are processed using mainly automated tools for the sole purpose of satisfying the requests of the data subject, who has the right to interrupt the aforementioned processing at any time;
> may be processed by communication and marketing staff, personnel in charge of maintaining IT systems whose task is to guarantee system functionality, data security, and backup operations, other employees within the limits of the assignments received and as provided for by company procedures, and other entities providing services for purposes auxiliary to satisfying the data subject's requests, within the limits strictly necessary to perform their tasks;
> may be communicated or made available:

This document has been prepared for the use of Arranger Consulting s.r.l. Any copying or use, even partial, by individuals or entities not authorized by current legislation or express consent, is strictly prohibited. Reproduction is permitted only if this footer is included in its entirety

- to entities that can access the data by virtue of a provision of law, regulation, or community legislation, within the limits provided by such norms
- to other entities providing services for purposes related to satisfying the data subject's requests, within the limits strictly necessary to perform their tasks
- to associated companies (subsidiaries - parent companies) always for current administrative-accounting purposes related to satisfying the data subject's requests

DATA RETENTION

The data communicated, unless otherwise indicated by the data subject and duly notified, will be kept for the time necessary to satisfy the data subject's requests and comply with legal regulations.

Where the data subject has a contractual relationship with the Controller, the data will be kept, if relevant to it, for the duration of the contract; once the contract has ended, retention will continue only if provided for by law and in accordance with the rules on the retention of administrative documentation.

Contact details for which consent has been given for the sending of commercial communications will be kept for up to 12 months following the last sending by the Controller or until the revocation of consent by the data subject; in the latter case, the e-mail addresses are included in a black list for 12 months in order to avoid the possibility of generating unwanted communications.

"WORK WITH US" SECTION

IMPORTANT INFORMATION

The spontaneous application form may be filled out exclusively by individuals of legal age.

The completion of the fields is reserved for the candidate interested in reporting their availability. Unless expressly delegated by the Candidate, current laws, particularly regarding privacy, do not allow third parties to fill out the fields or send resumes on behalf of the Candidate.

The Candidate may communicate only information of which they have full availability, having received the necessary authorizations from the subjects to whom such information refers.

We invite candidates to periodically update their data, keeping in mind that:

- resumes that have not been updated for more than 12 months may be taken into consideration for selection purposes; after this period, only the name, contact details, and general indication of the position of interest will be used for the purpose of requesting a possible data update and confirmation of availability from the data subject;
- in any case, 24 months after the last update by the candidate, your data may be deleted.

WHICH DATA ARE PROCESSED IN THE SELECTION PROCESS

a) data and information provided by the data subject or by persons delegated or authorized by them (also through the completion of personal data forms, submission of resumes, etc.);
b) data coming from public registers, lists, acts, or documents accessible to anyone;
c) data relating to pre-contractual information (curriculum vitae, data freely obtainable from public sources and/or provided by persons in charge of selection, etc.);
d) data originating during any checks and interviews in which the candidate participates and on the occasion of any assessment of psycho-physical suitability for the job (e.g.: subjective evaluations of the selection staff appointed by the Controller and any certificates of suitability issued in the pre-employment phase by the Competent Physician).

Among the data mentioned above, only if relevant and necessary in relation to the purposes indicated below, data relating to criminal convictions and offenses and/or special categories of data may also be included, such as: *personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as the processing of genetic data, biometric data intended to uniquely identify a*

This document has been prepared for the use of Arranger Consulting s.r.l. Any copying or use, even partial, by individuals or entities not authorized by current legislation or express consent, is strictly prohibited.
Reproduction is permitted only if this footer is included in its entirety

natural person, data relating to health or a person's sex life or sexual orientation. Among the data mentioned in point 1, the following are attributable to such categories, for example: data communicated by the data subject in reference to illnesses, including occupational ones, disabilities, infirmities, psycho-physical suitability to perform certain tasks, or belonging to protected categories.

DATA ORIGIN

The data mentioned above:

> originate from the data subject themselves, including through third parties acting on their behalf or authorized by them (e.g., family members, recruitment agencies, schools/training entities, associations, etc.)
> are acquired from sources freely accessible to anyone (public registers, lists, acts, or documents knowable by anyone, etc.);
> originate during any interviews in which the candidate participates and on the occasion of any assessment of psycho-physical suitability for the job;
> originate, in some cases, from previous employers - reference persons indicated by the candidate

WHY DATA ARE PROCESSED - PURPOSES OF PROCESSING

The processing to which personal data will be subjected has the following purposes, for each of which the "legal basis" that makes it possible is indicated in brackets *[the "legal bases" are the conditions that make a purpose lawful according to the provisions of Articles 6 and 9 of EU Reg. 2016/679]:*

a. evaluation of the candidate for the purposes of their possible employment, including outside of a dependent employment relationship. *[legal basis: pursuit of a legitimate interest of the data controller consisting in effectiveness in the selection processes - Art. 6(1)(f) - adoption of pre-contractual measures activated at the request of the data subject Art. 6(1)(b) - Art. 111 bis of Legislative Decree 196/2003];*
b. retention for possible future employment, including outside of a dependent employment relationship (e.g., project contracts, etc.), also by associated and/or subsidiary companies *[legal basis: consent of the data subject];*
c. verifying the truthfulness of the data provided by the candidate; it is specified in this regard that the truthfulness of the data necessary for a correct evaluation of the candidate is an essential requirement for participation in the selection; *[legal basis: pursuit of a legitimate interest of the data controller consisting in the protection of assets and in the correctness and effectiveness in selection processes and verification of statements made - Art. 6(1)(f) Art. 9(2)(f) EU Reg. 2016/679].*

HOW DATA ARE PROCESSED AND RETENTION PERIOD

In relation to the aforementioned purposes, the processing of personal data may take place using paper, IT, and electronic tools and will include all operations or sets of operations necessary for the processing in question, including communications within the scopes referred to in this document and any verifications of data accuracy carried out also through the subjects indicated on the data subject's resume; all this while always guaranteeing the absolute confidentiality, relevance, and non-excessiveness with respect to the purposes described above.

For certain roles requiring particular attention, the candidate may be asked to participate in specific psycho-aptitude tests provided by third parties who will act as independent data controllers.

Even if the candidate is not immediately selected, the above data will be kept, again for selection purposes, for a period not exceeding 24 months following the last contact with the data subject, keeping in mind that after 12 months, only the name, contact details, and general indication of the position of interest will be used for the purpose of requesting a possible data update and confirmation of availability from the data subject.

WHO MAY PROCESS THE DATA

For the same purposes, the data may be processed by the following categories of authorized personnel and/or processors, always and only within the limits of what is strictly necessary to perform their functions:

- Human Resources Department personnel.

This document has been prepared for the use of Arranger Consulting s.r.l. Any copying or use, even partial, by individuals or entities not authorized by current legislation or express consent, is strictly prohibited. Reproduction is permitted only if this footer is included in its entirety

- Managers and coordinators of the Department/Function/Office/Operating Unit interested in the candidate's profile.
- Resources entrusted with the management/maintenance of IT systems – System Administrators.
- Other employees within the limits of the assignments received and as provided for by company procedures.
- Entities (companies/professionals) collaborating as Processors pursuant to Art. 28 of EU Reg. 679/2016 in the activities, or providing services functional to them, such as: information systems management, training, organizational/management consultancy, and personnel selection; in this regard, it is noted that such entities will always be bound to full compliance with the rules and procedures aimed at guaranteeing the broadest protection and security of personal data adopted and imposed by the Controller, also and not only in compliance with current regulations.

TO WHOM DATA MAY BE COMMUNICATED AND DISSEMINATION

Personal data may be communicated to:

⇨ Entities/Companies in any case associated with the Controller that may have an interest in the candidate's profile.

⇨ In the pre-employment phase, should the candidate be selected, for the purposes of the fulfillments provided for by Legislative Decree no. 81 of April 9, 2008 (Consolidated Act on Health and Safety at Work), to the competent physician, who maintains ownership for all processing of sensitive personal data necessary to carry out the tasks assigned to them.

⇨ To other companies/consultants, whom you will encounter from time to time, involved in selection activities within the limits strictly necessary to perform the tasks entrusted to them, such as: assistance in the fulfillment or direct execution of fiscal obligations, information systems management, financial services, staff training, and organizational/management consultancy.

Naturally, the communications described above are limited only to the data necessary for the recipient Entity to perform its tasks and/or to achieve the purposes related to the communication itself, always attributable to what is reported in point 3 above.

DATA WILL NOT BE DISSEMINATED

TRANSFER TO NON-EU COUNTRIES

As a rule, the transfer of data to countries not belonging to the EU is not envisaged, unless this is necessary for the completion of the selection procedure and toward the country where the data subject is located or resides. The transfer will always be carried out in full compliance with the regulations and exclusively for the purposes mentioned above:

⇨ upon the occurrence of one of the conditions established in Art. 49 of EU Reg. 2016/679:
  a) the data subject has explicitly consented to the transfer;
  b) the transfer is necessary for the performance of a contract concluded between the data subject and the controller or for the implementation of pre-contractual measures adopted at the data subject's request;
  c) the transfer is necessary for the conclusion or performance of a contract stipulated between the controller and another natural or legal person in favor of the data subject;
  e) the transfer is necessary to ascertain, exercise, or defend a right in court;

⇨ and/or toward subjects required to guarantee an adequate level of protection also through the signing of the standard contractual clauses indicated at the European level (Commission Implementing Decision (EU) 2021/914 of 4 June 2021) or adopting and documenting other forms of adequate guarantee as provided for in Art. 46 of EU Reg. 2016/679.

When data communication is mandatory

The communication and updating of one's data is, of course, optional; however, the forms always indicate which data are mandatory for admission to the selection procedures. In the absence of other data, it will still be possible to participate in the selections, but the evaluations carried out will be less accurate.

This document has been prepared for the use of Arranger Consulting s.r.l. Any copying or use, even partial, by individuals or entities not authorized by current legislation or express consent, is strictly prohibited. Reproduction is permitted only if this footer is included in its entirety

COOKIES

To ensure the necessary accuracy, the service provided by COOKIEBOT (*https://www.cookiebot.com/*) has been activated; it guarantees the monitoring of cookies and constantly generates and updates the cookie policy made available upon accessing the site, to which you are referred for detailed information.

The legal bases for the processing operations originating from the use of cookies are:

> For technical cookies (necessary for the proper functioning of the site and to enable navigation): the legitimate interest of the controller, which coincides with the purpose of the cookies themselves.

> For any profiling cookies: the consent expressed by the user by selecting their choices on the banner that appears as soon as they arrive on the site. **N.B.:** as permitted by current legislation, the preferences expressed by the user are recorded on a specific technical-functional cookie stored on the device used by the user; consequently, by deleting this cookie (for example, if the browser is set to clear all cookies at the end of a session), the banner with the consent request will be displayed again upon the first new access to the site.

The Legal Bases are the conditions provided for by EU Regulation 2016/679 that make the purpose of the processing and the processing itself lawful.

COOKIES - IN-DEPTH ANALYSIS

What cookies are and how they work

Cookies are small text files that the websites visited by a user send to their terminal. These files are saved and stored in the folders of the user's browser, to be subsequently retransmitted to the same sites upon the next visit.
Through cookies, servers receive information that is re-read and updated every time the user returns to the sites that recognize the cookies.
Cookies contain the following information:

- indication of the server or domain from which they were generated;
- their duration (or expiration date);
- a unique identification code;
- a unique value.

In any case, cookies cannot cause damage to the user's computer.

What cookies are used for

Cookies have the task of facilitating site consultation and improving the browsing experience. Furthermore, they provide the site operator with information—most often aggregated and anonymous—on user navigation in order to obtain statistical data on the use of the site.

Additionally, some cookies collect and store information on the user's device about what the user has done on the sites; this information can be used:

> to recognize the user (or rather, the device used by the user) by re-proposing, even during subsequent visits, the settings previously requested/chosen by them;

> to analyze the preferences expressed by the user during navigation, creating a profile essentially used to display or send personalized commercial promotional messages that are in line with the interests inferable from the user's navigation.

This document has been prepared for the use of Arranger Consulting s.r.l. Any copying or use, even partial, by individuals or entities not authorized by current legislation or express consent, is strictly prohibited.
Reproduction is permitted only if this footer is included in its entirety

Types of cookies

Cookies can be divided into the following categories: *Technical Cookies* and *Profiling Cookies*.

> **"TECHNICAL" and Functionality COOKIES:** *Technical cookies are those used for the sole purpose of "carrying out the transmission of a communication over an electronic communications network, or to the extent strictly necessary for the provider of an information society service explicitly requested by the subscriber or user to provide such service" (cf. Art. 122, paragraph 1 of the Code).*

These cookies allow the site to function optimally; however, users may decide not to allow their use by modifying their browser settings. Please note that disabling these cookies may prevent access to certain features of the website.

Within the scope of technical cookies, the following can be distinguished:

- **Browsing Cookies**
  These are necessary to navigate the site using all its features (such as session maintenance and access to restricted areas) and do not collect information for profiling or commercial purposes. In the absence of such cookies, the requested services could not be provided.
- **Functionally Cookies**
  These allow the user to browse based on a series of selected criteria (e.g., site language), thereby facilitating navigation. The information collected through these cookies is anonymous.

The prior consent of users is not required for the installation of technical cookies, although the obligation to provide this information remains. The acquisition and processing of data resulting from the use of technical cookies are necessary for the correct consultation of the website. In case of opposition by the user, they will not be able to view the site correctly or in its entirety.

The legal basis for the use of technical cookies remains the legitimate interest of the controller, consisting in the proper functioning of the site and the improvement of the services provided.

Analytics Cookies

These are categorized as technical cookies when used directly by the site operator to collect information in aggregate form regarding the number of users and how they visit the site. They are used to optimize site management. The information collected by these cookies does not allow for the identification of the user.

> **PROFILING COOKIES**

As mentioned above, these cookies allow for the acquisition of information relating to preferences and the ways in which the user interacts with the site. They are used to assign a profile to the user (or more often, to the terminal used by the user) for the purpose of maximizing the effectiveness and usability of the site, including by personalizing the promotional/advertising messages displayed to the individual user.

Such cookies may only be installed on users' terminals when they have been previously and adequately informed and have provided consent which, as provided for by the regulation cited in the introduction, may also be expressed simply by continuing to browse after reading the notice displayed upon first accessing the site.

The legal basis for the use of profiling cookies is the consent of the data subject (the user of the device used for browsing)

DISABLING AND DELETING COOKIES

User privacy is fundamentally guaranteed by the fact that they can, AT ANY TIME:

> **Configure their browser to accept all cookies, reject them all, or receive a notification whenever one is sent,**
> **Delete one, some, or all cookies.**

Each browser has its own specific settings; therefore, we recommend consulting the "Help" section of the browser being used for more information on how to modify your preferences.

This document has been prepared for the use of Arranger Consulting s.r.l. Any copying or use, even partial, by individuals or entities not authorized by current legislation or express consent, is strictly prohibited. Reproduction is permitted only if this footer is included in its entirety

Most browsers are initially set to accept cookies automatically. In the case of different devices (for example, computers, smartphones, tablets, etc.), the User must ensure that the browser settings of each device are configured in such a way as to reflect their own cookie preferences.

Below are several links to the online documentation of the main browsers:

- Edge: *https://support.microsoft.com/it-it/windows/gestire-i-cookie-in-microsoft-edge-visualizzare-consentire-bloccare-eliminare-e-usare-168dab11-0753-043d-7c16-ede5947fc64d*
- Internet Explorer: http://windows.microsoft.com/it-it/internet-explorer/ie-security-privacy-settings#ie=ie-11
- Firefox: https://support.mozilla.org/it/kb/Gestione%20dei%20cookie
- Google Chrome: https://support.google.com/chrome/answer/95647?hl=it
- Safari iOS (iPhone, iPad, iPod touch): http://support.apple.com/kb/HT1677?viewlocale=it

Disabling COOKIES ON MOBILE DEVICES

Just like desktop browsers, mobile browsers allow you to modify privacy configurations or settings to disable or delete cookies.
If you wish to change your privacy settings, please follow the instructions provided by the browser developer for your mobile device.
Below are the valid links for some common browsers:

IOS	*https://goo.gl/fG1K8t*
Chrome Mobile	https://goo.gl/f0XME
Opera Mobile	http://goo.gl/Nzr8s7

USER RUGHTS – IN DEPTH ANALYSIS

Right of Access

The data subject has the right to obtain from the controller confirmation as to whether or not personal data concerning them are being processed and, where that is the case, access to the personal data and the following information:

a) the purposes of the processing;
b) the categories of personal data concerned;
c) the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations and, in such cases, the existence of appropriate safeguards;
d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
e) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
f) the right to lodge a complaint with a supervisory authority;
g) where the personal data are not collected from the data subject, any available information as to their origin;
h) he existence of automated decision-making, including profiling, which produces legal effects concerning them or similarly significantly affects them and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

Right to Rectification

The data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning them.

Right to Erasure

This document has been prepared for the use of Arranger Consulting s.r.l. Any copying or use, even partial, by individuals or entities not authorized by current legislation or express consent, is strictly prohibited.
Reproduction is permitted only if this footer is included in its entirety

The data subject shall have the right to obtain from the controller the erasure of personal data concerning them without undue delay, and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies:

a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
b) the data subject withdraws consent on which the processing is based and where there is no other legal ground for the processing;
c) the data subject objects to the processing, and there are no overriding legitimate grounds for the processing;
d) the personal data have been unlawfully processed;
e) the personal data must be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject;

Right to Restriction of Processing

The data subject shall have the right to obtain from the controller restriction of processing where one of the following applies:

a) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
c) although the controller no longer needs the personal data for the purposes of the processing, they are required by the data subject for the establishment, exercise, or defense of legal claims;
d) the data subject has objected to processing pending the verification whether the legitimate grounds of the controller override those of the data subject.

Right to Object

The data subject shall have the right to object at any time to processing of personal data concerning them for direct marketing purposes, which includes profiling to the extent that it is related to such direct marketing.

Right to Data Portability

The data subject shall have the right to receive the personal data concerning them, which they have provided to a controller, in a structured, commonly used, and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where:

a) the processing is based on consent or on a contract;
b) the processing is carried out by automated means.

In exercising their right to data portability, the data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.

This document has been prepared for the use of Arranger Consulting s.r.l. Any copying or use, even partial, by individuals or entities not authorized by current legislation or express consent, is strictly prohibited.
Reproduction is permitted only if this footer is included in its entirety

KEY DEFINITIONS

Personal Data: Any information relating to an identified or identifiable natural person

Special Categories" of Personal Data REQUIRE GREATER PROTECTION AND PARTICULAR ATTENTION, these are personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as genetic data, biometric data intended to uniquely identify a natural person, data concerning health, or data concerning a person's sex life or sexual orientation (Art. 9 of EU Reg. 2016/679)

Processing: Any operation or set of operations, performed by any means or modality and applied to personal data or sets of personal data (such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure **by transmission,** dissemination **or otherwise making available**, alignment or combination, restriction, erasure, or destruction)

Data Subject: The natural person to whom the personal data refer.

Controller: The natural or legal person, public authority, agency, or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data

Processors (appointed pursuant to Art. 28 of EU Reg. 2016/679): the natural or legal person, public authority, agency, or other body which processes personal data on behalf of the Controller.

Legal Basis of Processing:: il principio normativo in base al quale il trattamento di dati personali descritto può essere effettuato, in molti casi coincidente con la finalità dichiarata.

THIS TRANSLATION IS PROVIDED FOR INFORMATIONAL PURPOSES ONLY. FOR LEGAL PURPOSES, THE ITALIAN TEXT SHALL REMAIN THE SOLE AUTHORITATIVE VERSION.

This document has been prepared for the use of Arranger Consulting s.r.l. Any copying or use, even partial, by individuals or entities not authorized by current legislation or express consent, is strictly prohibited.
Reproduction is permitted only if this footer is included in its entirety