

“PRIVACY & COOKIE POLICY”

Information provided by GIUSO GUIDO SPA with sole shareholder, under pursuant to and for the purposes off the article 13 EU Reg. 679/2016

1. INTRODUCTION

In compliance with Reg. EU 679/2016, we hereby provide the necessary information regarding the purposes and methods of processing personal data to those persons who consult the pages of the website of **GIUSO GUIDO SPA with sole shareholder** (company subject to the management and coordination of Cone Investments UK Ltd), with registered office in Regione Cartesio snc, at Bistagno (AL-ITALY), Tax Code – VAT no. 01299970069, as Data Controller.

This information is valid solely for the website (www.giuso.it and www.lebuonenuove.it) and not for other websites that may be consulted via links published on this website; on such third-party websites, the data controller is not to be considered in any way responsible.

Users are informed that hosting of this website is provided by the company Hosting Solutions, with registered office at the address Via de Cattani n. 224/18 a Firenze (FI), CF/P.IVA n. 02002750483, whose servers that host the website are located in Italy.

2. TYPES OF DATA PROCESSED

Navigation data

Regarding only the technical aspects and protocols, we wish to inform you that:

- The computer systems and software procedures used to operate this website may acquire, during their normal operation, certain personal data whose transmission is implicit in the use of Internet communication protocols.
- This is information that is not collected to be associated with identified interested parties but which, by its very nature, could, through processing and association with data held by third parties, allow users to be identified.
- This category of data includes IP addresses or domain names of the computers used by the Users who connect to the website, the addresses in the Uniform Resource Identifier (URI) notation 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 (success, error, etc.) and other parameters relating to the operating system and the user's IT environment.
- This data can be used to ascertain any responsibility in case of hypothetical computer crimes against the website.

Cookies

Cookies are small text files that are sent from the website visited on the User's device (usually to the browser), where they are stored in order to recognize this device upon a subsequent visit. In fact, upon each subsequent visit, cookies are sent to the website by the user's device.

Each cookie generally contains: the name of the server from which the cookie was sent, the expiry date and a value, usually a unique number randomly generated by the computer. The server of the website that transfers the cookie uses this number to recognize the user when they returns to visit a website or browse from one page to another.

Cookies can be installed not only by the same operator of the website visited by the user (first-party cookies) but also by a different website that installs cookies through the first website (third-party cookies) and is able to recognize them. This happens because on the website visited there may be elements (images, maps, sounds, links to web pages of other domains, etc.) that reside on servers other than that of the website visited.

In general, cookies are classified into different types based on:

A. Duration:

- session cookies (temporary) automatically deleted when the browser is closed.
- persistent cookies active until its expiry date or its cancellation by the user.

B. Origin:

- first-party cookies sent to the browser directly from the website being visited.
- third-party cookies sent to the browser from other websites and not from the website being visited.

C. Purpose

- technical cookies
 - navigation/indispensable/performance/process/security cookies contribute to operation of the website, for example offering the possibility to browse through the pages or to access protected areas. If it is blocked, the website cannot function properly.

- functionality/preferences/localization/session status cookies allow the storing of information that changes the behaviour or appearance of the website (preferred language, size of texts and characters, geographical area of reference). If it is blocked, the experience is less functional but not compromised.
- statistical/analytic cookies, a) first-party or b) third-party with IP masking, without data crossing (similar to technical cookies in terms of purposes), are used to collect information and to generate statistics of use of the website to understand how visitors interact.
- non-technical cookies
 - third-party statistical/analytic cookies without IP masking, with data crossing, are used to collect information and to generate usage statistics, with possible identification and tracking of the website user, in order to understand how visitors interact.
 - profiling/marketing/advertising/tracking/conversion cookies for the selection of advertising based on what is relevant for a user (personalised ads). Profiling cookies are designed to create user profiles and are used in order to send advertising messages in line with the preferences shown by the same while surfing the Internet.

GIUSO GUIDO SPA with sole shareholder, has implemented the obligations established by the Regulations of the Authority for the Protection of Personal Data [Identification of the simplified procedures for the information and the acquisition of consent for the use of cookies - 8 May 2014](#) (Published in the Official Journal no. 126 of 3 June 2014)", as well as subsequent interventions by this Authority regarding "cookies".

Below we report all the information on cookies installed through this website and the necessary instructions on how to manage the preferences of users regarding them.

GIUSO GUIDO SPA with sole shareholder wishes to inform Users that its website (www.giuso.it and www.lebuonenuove.it) may use the following types of cookies:

- First-Party Technical Cookies, which do not require the User's consent;
- Third-Party Analytical Cookies, similar to technical cookies as tools have been adopted that reduce the identifying power of cookies (by masking significant portions of the IP address) and, the third party does not cross the information collected with other already in its possession.
- Profiling cookies.

Specifically, in addition to what was previously indicated, we report that the website (www.giuso.it and www.lebuonenuove.it) uses:

- **First-party technical cookies**

These cookies are necessary for the correct functioning of our website: these are cookies that are used to browse or to provide a service requested by the User; they are not used for other purposes and are installed directly by the data controller. Without the use of these cookies, certain operations could not be performed or would be more complex and/or less secure. Below is a brief description of the cookies of this type used by our website:

Name	Funtion	Duration
.AspNetCore.Antiforgery.jUSDyHwRjUxk	Technical cookie	Session
CookiePlugin	Technical cookie	3 years

- **Third-party analytical cookies, similar to technical cookies**

Our website uses third-party cookies for the management of statistics. In particular, our website uses Google Analytics: it is a web analytics service provided by Google Inc. ("Google") that uses cookies that are stored on the User's computer to allow statistical analysis in aggregate form in order to use the website being visited. It should be noted that tools have been adopted that reduce the identifying power of cookies (by masking significant portions of the IP address) and the third party does not cross information collected with other already available. For these cookies we provide the name of the third parties that manage them and the link to the page where the user can receive information on the processing and express their consent. Below is a brief description of the cookies of this type, used by our website:

Nome	Funzione	Durata	Terza Parte	Link alla Privacy della Policy Terza Parte	Opt Out
_gat	Technical cookie	1 day	GOOGLE INC. (Google Analytics)	http://www.google.com/intl/en/analytics/privacyoverview.html	https://tools.google.com/dlpage/gaoptout?hl=it
_gat_UA-41347672-1	Technical cookie	1 day		https://developers.google.com/analytics/dev	

				uides/collection/analytids/collection/analytids/csjs/cookie-usage	
_gid	Technical cookie	2 days	GOOGLE INC. (Google Analytics)	http://www.google.com/intl/en/analytics/privacyoverview.html https://developers.google.com/analytics/devguides/collection/analytids/csjs/cookie-usage	https://tools.google.com/dlpage/gaoptout?hl=it
_gcl_a_u	Technical cookie	90 days			
_ga	Technical cookie	1 year			
_fbp	Technical cookie	90 days	Facebook Inc.	https://www.facebook.com/privacy/explanation	https://it-it.facebook.com/business/help/471978536642445?id=1205376682832142
_ym_d	Technical cookie	1 year	YANDEX LLC	https://metrika.yandex.com/about/info/privacy-policy	https://yandex.com/support/metrika/general/opt-out.html
_ym_uid	Technical cookie	1 year			
_ym_visorc_57491740	Technical cookie	1 day			
_ym_isad	Technical cookie	2 days			

- **Profiling cookies**

Finally, we inform Users that the website uses so-called "Profiling" cookies exclusively of third parties. Profiling cookies are designed to create profiles related to the user and are used in order to send advertising messages in line with the preferences expressed by the same in the context of surfing the Internet. Below is a list of so-called "Profiling" cookies of third parties currently used by the website, with the indication of their name, of the function performed by each of them and of their duration:

- **Social network buttons**

The Social Buttons are the buttons on the website that depict the icons of social networks (e.g. Facebook, Twitter, etc.) and allow users who are browsing to interact with one click directly with social platforms. The Social Buttons used by the website (www.giuso.it and www.lebuonenuove.it) are links that refer to the accounts of the data controller on the social networks depicted. They are accessed through the use of these buttons. Third-party cookies are therefore not installed through our website. However, the references to the Social Network Buttons used by the website (www.giuso.it and www.lebuonenuove.it) are reported together with the links where the user can view the privacy policy regarding the management of data by the social networks to which the buttons refer.

Facebook button (Facebook Inc.)

The button is an interaction service with the social network Facebook, provided by Facebook, Inc.

Place of processing: USA

Privacy Policy: <https://www.facebook.com/privacy/explanation>

In general, aside from the type of cookies used by this website, we wish to inform Users that, in addition to the safeguards required by current legislation, certain options are available to browse without cookies, such as:

- Blocking of third-party cookies: third-party *cookies* are generally not essential for browsing and, as such, can be rejected by *default*, through specific functions of your *browser*.
- Activate the option of *Do Not Track*: the *Do Not Track* option is present in most of the latest generation of browsers. Websites designed to respect this option, when activated, should automatically stop collecting certain browsing data. As mentioned, however, not all websites are set to respect this option (discretionary).
- Activate the "anonymous browsing" mode: using this function it is possible to browse without leaving any trace in the navigation data browser. The websites will not remember the User, the pages that are visited will not be stored in the history and the new cookies will be deleted. The anonymous browsing function does not guarantee anonymity on the Internet as it is only used to avoid keeping browsing data in the browser while navigation data will continue to be available to website operators and to connectivity providers.
- Deleting cookies directly: there are special functions to achieve this in all browsers. Remember, however, that with every connection to the Internet, new cookies are downloaded, so the deletion operation should be performed periodically. If desired, some browsers offer automated systems for the periodic cancellation of cookies.

For any further requirement for further information on the issue of so-called "cookies", it is advisable to consult the following link:

<http://www.garanteprivacy.it/cookie>

In addition, to find out how to limit, block and/or to remove cookies set on your device, visit the following link:

<http://www.aboutcookies.org>

As previously mentioned, the User is also able to manage their own cookie preferences through their browser. To know the type and version of the browser being used, it is advisable to click on "Help" in the browser window at the top, from where it is possible to access all the necessary information. If you know the type and version of your browser, simply click on the link corresponding to the browser being used to access the cookie management page.

- **Microsoft Internet Explorer**

<http://windows.microsoft.com/en-us/windows-vista/block-or-allow-cookies>

- **Google Chrome**

<https://support.google.com/accounts/answer/61416?hl=it>

- **Mozilla Firefox**

<http://support.mozilla.org/en-US/kb/Enabling%20and%20disabling%20cookies>

- **Safari**

<http://www.apple.com/legal/privacy/>

Finally, for more information on how to manage cookies, it is advisable to visit the following web pages:

<http://www.youronlinechoices.eu>, <http://www.allaboutcookies.org>, <https://tools.google.com/dlpage/gaoptout>,

<http://aboutads.info/choices>, <http://www.networkadvertising.org/choices>.

Data provided voluntarily by the User.

Following consultation of this website, data relating to identified or identifiable persons may be processed. In particular, it is specified that such processing may take place in relation to personal data freely provided by Users who send their data to the data controller through the contact details on the website (www.giuso.it and www.lebuonenuove.it), such as, for example, company e-mail addresses, and/or filling out specific information gathering forms on the website. In fact, the optional, explicit and voluntary sending of e-mails to the addresses indicated on this website entails the subsequent acquisition of the sender's address, necessary for the purpose of responding to requests, as well as any other personal data included in the message. Detailed information specifications on the processing of data, pursuant to art. 13 of the EU Reg. 679/2016, is reported, from time to time, on the pages where there are forms for the collection of visitor data. This information is intended to define limits, purposes and methods of processing of each data collection form and each visitor can freely express their consent and authorize the collection of data and the subsequent use.

It should be noted that, in no section of the website, for access to any functionality of the website, is the assignment of "*special categories of personal data*" and/or "*personal data relating to criminal convictions and crimes*" requested, as defined by art. 9 and 10 of the EU Reg. 679/2016: if spontaneously the User sends to the data controller the information of the afore-mentioned

type, the data controller will process such data in compliance with the current legislation regarding the protection of personal data (EU Reg. 679/2016 and Italian Authority Measure no.146/2019) and within the limits of what is strictly necessary in relation to the requests made by the interested User.

In general, regarding the data provided voluntarily by the User, we wish to inform Users that the EU Reg. 679/2016 (and Legislative Decree 196/2003) provide for the protection of individuals with regard to the processing of personal data. According to this legislation, this processing will be based on principles of correctness, lawfulness and transparency, protecting your privacy and your rights.

Pursuant to the afore-mentioned articles 13 EU Reg. 679/2016 and Legislative Decree 196/2003, we provide you with the following information:

- a) The processing that the Data Controller may carry out will be performed through an automated process and/or through the collection of paper documents
- b) the User is free to provide their own information by sending it to the data controller via the contact details on the website (www.giuso.it and www.lebuonenuove.it) and/or by filling out specific information collection forms on the website; in the latter case, failure to provide certain data could, depending on the case, make it impossible to proceed with the activities requested by the User (for example, see "mandatory fields" marked with <<*>> within the information collection forms).
- c) the User's personal data will be processed by subjects specifically appointed by the data controller as data processors and/or by anyone acting under their authority and that have access to personal data; these subjects will process your data only when necessary in relation to the purpose of the conferment and only in the performance of the tasks assigned to them by the data controller, undertaking to process only the data necessary for carrying out these tasks and to perform only those operations necessary to carry out the same.
Furthermore, personal data may only be disclosed to third parties if this is strictly necessary to provide specific services or information requested by the User.

Finally, we point out that the data controller may use internal or external IT technicians for occasional maintenance, updating or assistance, in case of malfunction of the website. No data deriving from the web service will, however, be communicated or disseminated outside the company.

The communications of data described above are strictly connected to normal business operations in the context of the management of the relationship and are strictly necessary for the purposes for which the data was provided;

c1) the Data Controller may transfer personal data to a third country or to an international organization; in these cases they undertake to carry out the processing only in the presence of appropriate guarantees;

C2) in compliance with the Provision "Measures and arrangements prescribed to the data controllers with electronic instruments relating to the assignment of the functions of system administrator - 27 November 2008" (Official Journal no. 300 of 24 December 2008) and the related additions and amendments, the data controller has appointed specific **"System Administrators"** who, as part of the performance of their functions, will have access, including indirectly, to services or systems that process or allow the processing of personal information.

c3) the data will not be disclosed to other third parties, unless you have approved this, in advance, with your express consent.

Your personal data will not be disseminated.

- d) The data will be kept for the time necessary to achieve the purposes for which the data was provided; the data will be stored in a form that allows identification of the data subject for a period of time not exceeding that necessary for the purposes for which it was collected or subsequently processed, after which, if not expressly confirmed by the interested party, it will be deleted, or transformed into an anonymous form.
- e) The personal data provided will not be processed in order to implement an automated decision-making process (so-called profiling).
- f) In the hypothesis in which the personal data provided must be processed for purposes other than those indicated above, the Data Controller will provide you with information regarding this different purpose and any other relevant information.

The Data Controller, taking into account the state of the art and the implementation costs as well as the nature, scope, context and purpose of the processing, both when determining the means of processing and at the time of the processing itself (so-called risk analysis - *accountability*), has put in place adequate technical and organizational measures aimed at effectively implementing the data protection principles and integrating the necessary guarantees in order to meet the requirements of EU Reg. 679/2016 and to protect the rights of the interested party.

Data will be processed using methods and instruments suitable to guarantee security (art. 24, 25 and 32 EU Reg. 679/2016) and will be carried out through an automated process and through non-automated means (paper archives) to which all technical and organizational measures will be applied to ensure a level of security appropriate to the risk to ensure on a permanent basis its confidentiality, integrity, availability and resilience of the processing systems and services (by way of example but not limited to: controls both on the assignment of tasks to the persons responsible for data processing and on the classification of the data itself, procedures, if sustainable, of pseudonymisation and encryption, *disaster recovery* mechanisms, etc.).

We inform you that the processing of data is based on the provisions of art. 6, paragraph 1, lett. a) EU Reg. 679/2016, and the User is free to provide their own information by sending it to the data controller through the addresses on the website (www.giuso.it and www.lebuonenuove.it) and/or by filling out specific information collection forms on the website; in the latter case, failure to provide certain data could, depending on the case, make it impossible to proceed with the activities requested by the User (for example, see "mandatory fields" marked with <<*>> within the information collection forms).

The **data controller** is: **GIUSO GUIDO SPA with sole shareholder** (company subject to the management and coordination of Cone Investments UK Ltd), with registered office in Regione Cartesio Snc, Bistagno (AL), C.F. – P.I. n. 01299970069, Telephone: +39 0144 359411, Fax: +39 0144 322964, website: www.giuso.it – www.lebuonenuove.it, mail privacy@giuso.it, pec giuso@legalmail.it (defined above and below "Data Controller").

Pursuant to art. 28 of the EU REG. 679/2016, the Data Controller may use third parties that process data on its behalf and formally appointed by it as data processors. The complete and updated list of data processors appointed is available by sending a request to the e-mail address privacy@giuso.it

Pursuant to art. 29 of the EU REG. 679/2016, the Data Controller may use anyone acting under their authority and/or the appointed manager; these subjects will be duly instructed.

The Data Controller has not designated the D.P.O. (Art. 37 EU REG. EU 679/2016 and WP Guidelines article 29 of 13.12.2016), as they are an unnecessary figure within the structure, given that the processing characteristics do not fall within the cases referred to in the aforementioned article 37.

The Data Controller also informs that:

- g) the interested party has the right to ask the Data Controller to access their personal data, to correct or cancel it, to limit its processing or to oppose its processing in addition to the right to data portability (art. 15, art. 16, art. 17, art. 18, art. 20 EU REG. 679/2016); with the exercise of the right of access, the interested party has the right to obtain from the Data Controller confirmation that it is or is not processing any personal data concerning them while the exercise of the right to portability allows the interested party to obtain from the data controller personal data in a structured format, in common and readable use, or the transfer of such data from the original data controller to another (see WP 242 of 13.12.2016);
- h) the interested party has the right, where the processing is based on article 6, paragraph 1, letter a) or on article 9, paragraph 2, letter a), to withdraw their consent at any time without compromising the lawfulness of the processing based on the consent given before the withdrawal;
- i) the interested party has the right to lodge a complaint with a supervisory authority;
- j) the interested party has the right to learn of, from the Data Controller, which must respond appropriately without justified delay, any violation of personal data likely to present a high risk for the rights and freedoms of individuals (art. 34 EU REG. 679/2016).

The full text of the articles of the EU REG. 679/2016 related to your rights (articles 15 to 23 inclusive) is available at any time at the following link on the website of the Authority for the Protection of Personal Data:

- <https://www.garanteprivacy.it/regolamentoue>

or, alternatively, the Data Controller will provide you with it in response to your request, by sending a communication to the addresses previously indicated.

3. CHANGES TO THE "PRIVACY & COOKIES POLICY" DOCUMENT

The Data Controller reserves the right to make changes to this Privacy & Cookies Policy, at any time, notifying Users thereof on this page. Therefore, we would ask Users to frequently consult this page, taking as reference the date of last modification indicated at the bottom.

In the event of any updates or changes to this document, Users will be placed in a position to understand and evaluate the changes made, being able to compare the different versions of the information that may have been available over time, as the previous versions of the document will still be available for User consultation on the website.

In the event of non-acceptance of the changes made to this privacy statement, the User is required to cease using this website and to ask the Data Controller to delete their personal data by sending a specific communication to the data controller, at the addresses previously indicated

Unless otherwise specified, this Privacy & Cookies Policy will continue to apply to personal data collected until then.

For any questions, comments and requests relating to this privacy statement, Users can contact us at the following addresses:

Fax: +39 0144 322964, mail privacy@giuso.it, pec giuso@legalmail.it (defined above and below "Data Controller"). In any event, we invite Users to report any difficulties encountered in viewing this Privacy & Cookies Policy in order to be able, if necessary, to provide alternative methods of information.

Bistagno (AL), data last modification 01.01.2020