



## **PRIVACY POLICY (ACCORDING TO ART. 13 LEGISLATIVE DECREE NO. 196 OF JUNE 30, 2003)**

The Data Subject (User or visitor of the website) is informed that Legislative Decree No. 196/2003 (known as the "Personal Data Protection Code" or simply the "Code") provides for the protection of individuals with regard to the processing of personal data. In accordance with the provisions of the aforementioned Code and current legislation, the processing will be based on the principles of fairness, lawfulness, and transparency, respecting the rights and fundamental freedoms, as well as the dignity of the data subject, with particular regard to confidentiality, personal identity, and the right to the protection of personal data. This information is provided in accordance with Article 13 of the Code and is subject to updates, which will be made public on the website.

## **DATA CONTROLLER**

The data controller is Bartoli 2000 SRL - Via I Maggio No. 22 - Zona Ind. Terrafino 50053 - Empoli (FI) Telephone: 0571.261836 - Fax: 0571.242147 - VAT number: 05055930480 - CF: 05055930480, except as provided in the specific information provided to the Data Subject regarding the registration of ".it" domains, which, in accordance with Article 29 of the Code, may appoint one or more data processors operating under its direct authority based on the instructions received.

## **ENTITIES TO WHOM DATA MAY BE DISCLOSED OR WHO MAY BECOME AWARE OF IT AS DATA PROCESSORS**

The processing of personal data related to the web services of this site takes place at the premises of Bartoli 2000 SRL and is handled only by authorized personnel responsible for the processing.

## **DATA PROCESSING METHODS**

Personal data is processed using both automated and non-automated tools, for the time strictly necessary to achieve the purposes for which they were collected. Specific security measures are implemented to prevent data loss, unlawful or incorrect use, and unauthorized access.

## **RIGHTS OF THE DATA SUBJECT**

The data subject has the rights outlined in Article 7 of Legislative Decree No. 196/2003 (Right to access personal data and other rights), which are stated below:

"1. The data subject has the right to obtain confirmation of the existence or non-existence of personal data concerning them, even if not yet recorded, and their communication in an intelligible form.

The data subject has the right to obtain the following information:

- a) the origin of the personal data;
- b) the purposes and methods of the processing;
- c) the logic applied in case of processing carried out with the aid of electronic tools;
- d) the identification details of the data controller, data processors, and the designated representative pursuant to Article 5, paragraph 2;
- e) the subjects or categories of subjects to whom the personal data may be communicated or who may become aware of it as designated representatives within the territory of the State, data processors, or persons in charge.

The data subject has the right to obtain:

- a) the updating, rectification, or, when interested, integration of the data;
- b) the erasure, anonymization, or blocking of data processed unlawfully, including data that does not need to be retained for the purposes for which it was collected or subsequently processed;
- c) the certification that the operations referred to in points (a) and (b) have been notified, as also related to their contents, to the entities to whom or which the data was communicated or disseminated, unless this requirement proves impossible or involves a manifestly disproportionate effort compared to the right being protected.

The data subject has the right to object, in whole or in part:

- a) on legitimate grounds, to the processing of personal data concerning them, even if relevant to the purpose of the collection;
- b) to the processing of personal data concerning them for the purpose of sending advertising or direct sales material or for carrying out market research or commercial communication."

Note: The translation above is a faithful rendering of the original text; however, it is always advisable to consult the official version or seek legal advice for accurate interpretation.

#### **OPTIONALITY OF DATA PROVISION**

We inform Users that, except for navigation data, the provision of data is optional, but any refusal may prevent Bartoli 2000 SRL from promptly and correctly managing the contact request or the provision of the requested service by the Data Subject.

#### **SECURITY OF INFORMATION**

All information collected on the website is stored and maintained in secure facilities that limit access exclusively to authorized personnel. The website is regularly monitored to detect any security breaches and ensure that all collected information is safe from unauthorized viewing. Bartoli 2000 SRL adheres to all security measures described by applicable laws and regulations, as well as to the most advanced criteria currently available, to ensure and guarantee the confidentiality of users' personal data and minimize, as much as possible, the risks posed by unauthorized access, removal, loss, or damage to users' personal data.

#### **TYPES OF DATA PROCESSED, DURATION, AND PURPOSE OF PROCESSING**

The processing we intend to carry out aims to conclude, manage, and fulfill contact requests or service provision requests submitted by the Data Subject. It also involves organizing, managing, and fulfilling the aforementioned contact and service provision requests, including through communication to third parties in general, such as suppliers, collaborators, and/or affiliated companies, for the purpose of service delivery and/or rights defense and/or compliance with legal obligations or regulations, upon request by competent authorities. The processing of data will adhere to the principles of fairness, lawfulness, and transparency.

The personal data of the Data Subject may be used to request information, including by phone, regarding the quality of the services offered, or concerning possible termination/transfer of the same. Specifically, regarding the processing of traffic data, they may be used for marketing purposes in accordance with Article 123 of the Code. Such data may be retained for periods longer than those indicated by Article 123 of the Code, but strictly for the duration necessary to achieve the purposes for which they are stored.

## **DATA VOLUNTARILY PROVIDED BY USERS**

The voluntary, optional, and explicit submission of data to Bartoli 2000 SRL by the user (such as when registering in Bartoli 2000 SRL's database or providing personal data via email to verify the possibility of accessing the services provided by Bartoli 2000 SRL, as well as sending emails to the addresses indicated on this website) entails the subsequent acquisition of the sender's address and the data provided by the user. By doing so, the user also expressly consents to the processing of such data. If users enter or otherwise process third-party data, they guarantee, taking full responsibility, that they have previously provided them with the information required by Article 13 of Legislative Decree no. 196/2003 and have obtained their consent for the processing of such data.

## **DATA VOLUNTARILY PROVIDED BY USERS FOR ADVERTISING COMMUNICATIONS**

In case users give their consent for the processing of personal data to receive advertising and promotional communications about Aruba services, enjoy discounts, giveaways, and exclusive offers, in accordance with Article 13 of the Code:

a) The processing aims to conclude, manage, and execute the request made by the Data Subject to subscribe to Bartoli 2000 SRL's newsletter and other mailing lists in order to receive commercial, promotional, and advertising communications via email about Aruba services; to organize, manage, and execute the aforementioned subscription request, including the communication of data to third-party providers or companies within the Aruba Group; to fulfill legal obligations or other requirements requested by the competent authorities.

b) The processing will be carried out using automated/manual methods.

c) The collected data will be used by Bartoli 2000 SRL for the complete and proper management of the newsletter and mailing list subscription request and may be disclosed to third parties for the purpose of defending rights, as well as to fulfill legal obligations or requirements requested by the authorities. The processing of data will adhere to the principles of fairness, lawfulness, and transparency, protecting the confidentiality and rights of the Data Subject and third parties.

The Data Subject may refuse the use of their email address at any time to receive the aforementioned communications and may object to such processing. To stop receiving communications from the newsletter and mailing lists, the Data Subject may follow the cancellation procedure indicated in the same commercial, promotional, and advertising communications sent to them.

## **NAVIGATION DATA**

The computer systems and software procedures used to operate this website acquire, during their normal operation, certain navigation data that are transmitted implicitly through the use of internet communication protocols. These are data related to telematic traffic that, by their nature, are not immediately associated with identified individuals, but which, through processing or association with data held by third parties, could allow the identification of users/visitors of the website (such as IP addresses, type of browser and operating system used by the user, time of request for access to web pages). This data is used only for anonymous statistical information regarding website visits or to verify its proper functioning. Such data is stored by Bartoli 2000 SRL for the period strictly necessary and in accordance with applicable legal provisions.

## **INFORMATION**

For privacy-related information and inquiries, you can contact Bartoli 2000 SRL through:

Company: Bartoli 2000 SRL

Address: Via I Maggio 22 - Zona Ind. Terrafino 50053 - Empoli (FI)

Phone: +39 0571 261836

Email: [info@bartoli2000.it](mailto:info@bartoli2000.it)