

**Subject: Website policy**

This page outlines the management procedures of this website for the processing of users' personal data.

This policy has been drafted pursuant to Article 13 of Legislative Decree No 196/2003 - Personal Data Protection Code for anyone who interacts with the company's web services that can be accessed online from the address:

**<http://www.pantareiservizieducativi.it>**

corresponding to the homepage of the official website.

This policy only applies to this website and not for any other websites that users may visit via links.

This policy is also based on Recommendation No 2/2001, which was adopted on 17 May 2001 by the European data protection authorities within the Working Party set up under Article 29 of Directive No 95/46/EC. The purpose of which was to identify certain minimum requirements for the collection of personal data online and, in particular, the methods, timescales and nature of the information which data controllers must provide to users when they visit web pages, regardless of the purpose of their visit.

**THE DATA CONTROLLER**

Data on identified or identifiable persons may be processed if they visit this website.

The Data Controller is the PANTA REI Social Cooperative in the person of its present legal representative.

**LOCATION OF THE DATA PROCESSING**

The processing connected to the web services of this site shall take place at the company's head offices. This processing shall only be handled by technical staff of the Department in charge of the processing or by any employees in charge of occasional maintenance operations.

No data from the web service shall be disclosed or circulated.

Any personal data provided by users who send requests for information (bulletins, CD-ROMs, catalogues, price lists, answers to questions, various tasks, etc) shall only be used to perform the requested service.

**CATEGORIES OF DATA PROCESSED***Browsing data*

During their ordinary course of operation, the IT systems and software procedures required to run this website will acquire certain personal data, the transmission of which is implicit in the use of Internet communication protocols.

This information is not collected to be associated with identified data subjects. However, by its very nature, it may identify users through the processing and matching of data held by third parties.

This category of data includes the computer IP addresses and domain names of users who visit the site, as well as the URI addresses (*Uniform Resource Identifier*) of the requested resources, the time of the request, the method used to submit the request to the server, the size of the file received in reply, the numerical code indicating the status of the reply from the server (successful, error, etc) and other parameters relating to the operating system and computer of the user.

This data is only used to extract anonymous statistical information on how the website is used and to ensure that it is running properly. It is deleted immediately after processing. The data might be used to establish liability in the event of any potential computer crimes against the site: otherwise, the web contact data will currently not be stored for over seven days.

*Data provided voluntarily by the user*

If the user sends e-mails optionally, explicitly or voluntarily to the addresses indicated on this website, the sender's address and any other personal data included in the message will then be acquired to reply to the requests.

Specific summarised policies shall be progressively provided or displayed on the pages of the website for specific requested services.

## **USE OF COOKIES**

For information on how cookies are used, please see the special additional "extended policy" published on this website that has been drafted in accordance with the Provision of 8 May 2014 issued by the Personal Data Protection Authority, which incorporates and completes this document.

## **OPTIONAL DATA PROVISION**

Apart from the specifications on browsing data, the user is free to provide personal data. However, if this data is not provided, it might not be possible to fulfil the request.

## **PROCESSING METHODS**

Personal data shall be processed with automated means for the time strictly necessary to achieve the purposes for which it was collected.

Specific security measures shall be implemented to prevent data loss, unlawful or inappropriate use and unauthorised access.

## **DATA SUBJECT RIGHTS**

Data subjects have the right to obtain confirmation at any time on the existence, or otherwise, of their data and to know its contents and origin, to verify its accuracy or to request that it is supplemented, updated or corrected (for full details please see Article 7 of Legislative Decree No 196/2003).

Pursuant to the same Article, they also have the right to request the cancellation, anonymisation or blocking of any data being processed illegally. They are also entitled to reject any processing of this data on legitimate grounds.

Any requests should be sent to the Data Controller or to the Data Supervisor, Dr Juri Torreggiani (see below).

This document forms the "*Privacy Policy*" of this website, which will occasionally be updated.

## **Privacy Supervisor List (Article 13 of Legislative Decree No 196/2003)**

The following list of the Privacy Supervisors of the PANTA REI Social Cooperative is published pursuant to Article 13, paragraph 1, letter f of the "Personal Data Protection Code" (Legislative Decree No 196/03), in order to notify all data subjects of the Data Supervisors for the processing carried out by this company.

### **List of Supervisors**

- 1. Supervisor for data subjects: Dr Juri Torreggiani, with offices in Reggio Emilia, Via Piccard 16/g, tel. +39 0522/30 11 69 – fax +39 0522/38 79 96;**
- 2. "Privacy" Supervisor: Dr Juri Torreggiani, with offices in Reggio Emilia, Via Piccard 16/g, tel. +39 0522/30 11 69 – fax +39 0522/38 79 96;**