PRIVACY POLICY

This policy statement describes how the personal data of users and visitors of this website is processed and managed.

This statement – also in pursuance of Section 13 of Legislative Decree 196/2003 (Code for the Protection of Personal Data) – is provided to those who interact with the services of Tre Marie Ricorrenze as a single-member limited liability company subject to the management and coordination of Galbusera s.p.a. (hereinafter also referred to as Tre Marie Ricorrenze), which can be accessed electronically through the web address:

www.tremariericorrenze.it

which is the home page of our website.

This statement applies exclusively to the aforementioned website and does not concern any other websites the user might access via links.

The following indications are based both on the Privacy Policy model provided on the website of the Autorità Garante per la protezione dei dati personali (Italian Data Protection Authority), and on the guidelines contained in Recommendation 2/2001, which was adopted on May 17, 2001, by the European Data Protection Authorities within the Working Party set up under Section 29 of the European directive 95/46/EC in order to lay down minimum requirements for the online collection of personal data, with special regard to the arrangements, timing and nature of the information to be provided by data controllers tu users browsing web pages for whatever purpose.

Data Controller

Browsing this website or voluntarily signing up with it may entail the processing of data concerning identified or identifiable persons.

The Data Controller is Tre Marie Ricorrenze s.r.l. as a single-member limited liability company subject to the management and co-ordination of Galbusera s.p.a., with offices at via Domenico Trentacoste 5, Milan, together with its parent company Galbusera s.p.a., with offices at viale Orobie 9, Cosio Valtellino (SO).

Persons and entities responsible for data processing

Personal data may be brought to the attention of employees or co-workers of the Marketing office of the Data Controller who, working under the direct authority of the latter, are in charge of or responsible for the processing in pursuance of Sections 29 and 30 of the Code and will receive proper operating instructions. The same will happen – as made sure by the persons in charge appointed by the Data Controller – with regard to employees or co-workers of said persons. As pursuant to Section 29, the full list of the appointed persons in charge is available at the office of the Data Controller.

Categories of Processed Data

Browsing Data

The information systems and software procedures utilised to operate this website acquire personal data as part of their standard functioning; the transmission of such data is an inherent feature of internet communication protocols. Such information is not collected in order to relate it to identified
Data Subjects; however, it might allow user identification per se after being processed and matched with data held by third parties. This data category includes: IP addresses and domain names of computers employed to connect to the website, addresses of requested resources in URI (Uniform Resource Identifier) notation, the time of the requests, the method used to submit requests to the server, the size of the files obtained in response, the numeric code indicating the state of server responses (successful conclusion, error, etc.) and other parameters relating to the user’s operating system and computer environment.

This data is only used to extract anonymous statistical information about the use of the website as well as to check on its functioning. The data might be used by authorities to establish liability in case of hypothetical computer-related crimes resulting in damage of the site. Personal data voluntarily provided by the user may also be processed.

**Cookies**

Use of the so-called session cookies (which are not stored permanently on the user’s computer and disappear upon closing the browser) is exclusively limited to the transmission of session identifiers (consisting of random server-generated numbers) as necessary to allow secure and effective navigation of the website and of its apps.

The so-called session cookies used in this website make it possible to refrain from resorting to other IT techniques that might be detrimental to the confidentiality of user navigation, and they do not allow the acquisition of the user’s personal identification data.

The systems utilised within this website analyse the user’s browsing history to create statistics or improve the contents to be offered and, if need be, to place targeted advertising into the website pages. The system here used is Google Analytics, a web analysis service provided by Google, Inc. (“Google”). As any other system, Google Analytics uses “cookies”, i.e. text files that are stored in your computer to enable the website to analyse how users exploit the site. Information on your use of the website generated by the cookie (including your IP address) will be transmitted to and stored by Google servers in the United States. Google will use such information to trace and examine your use of the website, to compile reports on the activities of the website for its operators, and to provide other services related to the activities of the website and internet use. Google may also transfer such information to third parties where required to do so by law, or where such third parties process the information on behalf of Google. Google will not associate your IP address with any other data possessed by Google. You may refuse to use the cookies by selecting the appropriate settings on your web browser, but this might prevent you from exploiting all the functions of this website. By using this website, you consent to the processing of your data by Google by the aforementioned methods and purposes.

No other use is made of cookies for the transmission of personal information, nor will other persistent cookies or other user tracking systems be used. Please bear in mind that you can set your browser (e.g. Firefox, Internet Explorer, Safari, Chrome) so that it will not accept cookies, thus activating the so-called “anonymous navigation” function: this way no information will be processed through these systems.

**Optional data provision**

Apart from what has been specified with regard to browsing data, users are free to provide their personal data. The optional, explicit and voluntary submission of data via application forms and e-mails sento to the address mentioned on this website entails the subsequent acquisition of the sender’s address, which is necessary for responses to requests, and of any other personal data contained in the message.
The Data Controller guarantees that personal data provided by users requesting information (first name, last name, e-mail address, message content) will be used only to the purpose of providing the requested service. However, failure to provide such data entails the impossibility to satisfy said requests. In particular, personal data voluntarily provided by users will be processed for the following purposes:

- to provide the user with responses regarding our products and services;
- to provide the user with assistance and customer care services;
- only with the user’s explicit prior consent, to perform direct marketing activities through automated means (e.g. e-mail, SMS, MMS) and non-automated means (operator-made phone calls or ordinary mail);
- to elaborate statistics in anonymous form (e.g. to assess the number of accesses to the website).

Specific summary information and requests for consent will be progressively posted or displayed on the pages of the site dedicated to particular services.

Processing Arrangements
Personal data is processed – also through automated and electronic means – only for the time necessary to achieve the purposes for which it has been collected, and it is forwarded to third parties only when necessary to fulfil the requested service. Specific security measures have been implemented to prevent unauthorised access to, loss of, or unlawful or improper use of data.

Rights of Data Subjects
Data Subjects are at any time entitled to obtain confirmation of the existence of personal data concerning them and to be informed of its origin and contents, to check its accuracy, or else request that such data be supplemented, updated or amended (Section 7 of the Code for the Protection of Personal Data). The aforementioned section also establishes the right to request that data processed in violation of the law be deleted, made anonymous, or frozen, as well as to object in all instances to its processing, if on legitimate grounds (also choosing the means for such action – e.g., only via e-mail, or SMS, or operator-made phone call, or ordinary mail).
All requests should be sent by email to info@tremariericorrenze.it, or via ordinary mail to the postal address of the Data Controller.