WEBSITE E COOKIE POLICY

Within the meaning of (i) Art. 13 of the Legislative Decree of June 30th 2003, n. 196 (“Privacy Code”), (ii) EU Regulation 2016/679 on the ‘protection of natural persons with regard to the processing of personal data, and on the free circulation of such data’, the “GDPR”, art.13 and 14, and of (iii) the General Provision of the Italian Data Protection Authority of May 8th 2014, CGM Cigiemme S.p.A. as a Data Controller within the meaning of art. 4 of the GDPR (“Company” or “Controller”), wish to inform you, as a Data Subject (“Data subject” or “User”) about of the type of data acquired and used, of the purposes followed and of the processing operations carried out during the visit to the website [http://www.cgm-cigiemme.it/](http://www.cgm-cigiemme.it/) (hereinafter called “Website”) and following the interaction of Users with the services and features of the Website.

This document is valid only for the present official “Website” of CGM CIGIEMME S.P.A and not for other external websites possibly visited by the user during the network browsing.

A) **Data Controller and Data Protection Officer (DPO)**

The Data controller is CGM CIGIEMME S.P.A. headquarterd in Via Adda, 21 – 20073 Opera (MI), E-mail: cgm@pec.cgm-cigiemme.it.

The Data Protection Officer is Studio Cattaneo Dall’Olio & Partners headquartered in Via D. Piccinini, 2, Bergamo, email: privacy@cattaneodallolio.it.

B) **Type of Data processed**

Our website collects the users’ data in two different ways.

### Voluntary Data Submission

The website may collect other data in case of voluntary use of services by the User, such as communication services (contact forms), which will be exclusively used to provide the service required and for which a specific statement has been prepared on the relative page of the website.

### Automatically collected data

The computer systems and software procedures used for this “Website” collect in the normal course some personal data whose transmission is implicit in the use of the Internet communication protocols.

This information is not collected in order to be associated with identified data subjects, but for their very nature they may be able to identify the users through processing and association with data held by third parties.

Also, during the browsing, the following information of the users may be collected and stored in the server log files (hosting) of the website. These shall include, but not be limited to the following: Internet protocol address (IP), browser, parameters of the device used to connect to the website, name of the internet service provider (ISP), date and time of visit, webpage of origin (referral) and exit of the user, number of clicks.

These data are used for statistical and analytic purposes, exclusively in aggregated form. The IP address is only used for security purposes and is not cross-checked with other data.

### Service Description

<table>
<thead>
<tr>
<th>Service</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mailing list</td>
<td>Mailchimp (The Rocket Science Group LLC)</td>
</tr>
<tr>
<td>Servizi di piattaforma e hosting</td>
<td>WordPress.com is provided by Automattic Inc. and it allows the Owner to develop, operate and host this application.</td>
</tr>
<tr>
<td>Google Fonts</td>
<td>Character style display service managed by Google LLC or by Google Ireland Limited, depending on the position in which this application is used which allows this application to integrate such content within its pages.</td>
</tr>
<tr>
<td>Font Awesome (Fonticons, Inc.)</td>
<td>Character styles visualization service managed by Fonticons, Inc. which allows this application to integrate these contents within its pages.</td>
</tr>
</tbody>
</table>
Cookies
Our website uses cookies, in order to make our services as efficient and simple to use as possible. Cookies are small text files that allow us to compare new and past visitors and to understand how users go through our website. We use the data collected through cookies in order to offer an experience that is able to reflect your interest, preferences and facilitate the access to our services. Cookies do not record any personal data of a user and the relative identifiable data will not be stored. If you wish to disable the use of cookies you have to customise the settings on your computer and delete all the cookies or activate an alert when cookies are stored. To proceed without modifying the use of cookies you only need to continue browsing.

The website uses the following categories of cookies:

**Essential cookies**
These cookies are necessary to browse through our website and use its features, such as access to the different restricted areas of the website. Without these cookies some of the necessary services (for example filling in a form for a contest) will not be available.

**Functional cookies**
Cookies allow to remember the choices made by the user (such as name, language or region of origin) and provide advanced customised experiences. These cookies may also be used to remember the modifications made to the text size and font as well as other customisable parts of the website. Also, they may be used to provide services required (such as watch a video). The information collected by this kind of cookies may be anonymous in order to avoid the monitoring of the browsing activity on other websites. By visiting our website, the User accepts that these cookies are installed on his or her device.

**Third party Cookies**
The services contained in this section allow the controller to monitor and analyse the traffic data and serve to keep track of the user's behaviour.

<table>
<thead>
<tr>
<th>Type</th>
<th>Purpose</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Google Analytics con IP anonymized (Google LLC)</td>
<td>Statistics</td>
<td>Web analytics service provided by Google LLC. (“Google”). Google uses the information collected in order to mark and review the use of this WEB site, build reports, and share them with other services developed by Google. Google may use your personal information to contextualize and personalize your advertising network ads. This integration of Google Analytics makes anonymous its IP address. Anonymity shortens within the confines of the Member States of the European Union or in other countries adhering to the agreement on the European Economic Area the IP address of users. Only in exceptional cases will the IP address be sent to Google's servers and shortened within the United States. Place of processing: USA – Privacy Policy; Ireland – Privacy Policy. Privacy Shield participant.</td>
</tr>
<tr>
<td>Wordpress Stats (Automattic Inc.)</td>
<td>Statistics</td>
<td>Wordpress Stats is statistics service provided by Automattic Inc. Place of processing: USA – Privacy Policy.</td>
</tr>
<tr>
<td>Google reCAPTCHA</td>
<td>SPAM protection</td>
<td>SPAM Protection Service provided by Google LLC or by Google Ireland Limited, depending on where this application is used. The use of the reCAPTCHA system is subject to the Privacy Policy and terms of use of Google. Place of processing: USA – Privacy Policy; Ireland – Privacy Policy - Privacy Shield participant.</td>
</tr>
<tr>
<td>Widget Google Maps (Google LLC)</td>
<td>Visualization of content from external platforms</td>
<td>Google Maps is a map viewing service managed by Google LLC or by Google Ireland Limited, depending on the location where this application is used and allows this site to integrate such content within its own pages. Place of processing: USA – Privacy Policy; Ireland – Privacy Policy - Privacy Shield participant.</td>
</tr>
</tbody>
</table>
**Cookie preferences**

Your consent to the use of cookies is given as follows:
- By clicking on the button “Accept” on the banner containing the short statement that appears when you access the website;
- By continuing your browsing through another area of the website or selecting an element of the same page.

**How to modify cookie settings**

Please verify that your computer/smartphone settings shall accept or reject cookies. You can set your browser in order to be warned before accepting cookies, or you can configure it to refuse them automatically – even if in this way you won’t have access to all the features of the website. You have to be sure that all the browsers you use, if you use a computer in different locations, is configured on the basis of your cookie preferences.

Below you can find the procedure to follow to manage cookies with these browsers:

- **Opera:** [https://www.opera.com/it/terms](https://www.opera.com/it/terms)
- **Chrome:** [https://support.google.com/chrome/answer/95647?co=GENIE.Platform%3DDesktop&hl=it](https://support.google.com/chrome/answer/95647?co=GENIE.Platform%3DDesktop&hl=it)

**C) Purposes**

Below are the purposes of the processing of data collected by our website:
- **Statistical purposes (analysis)**
  Collection of data and information exclusively in aggregated form in order to verify the correct functioning of the website. None of this information are related to the natural person-user, and do not allow his or her identification. No explicit consent is required.
- **Security**
  Collection of data and information in order to ensure the safety of the website (antispam filters, firewall, virus detection) and of the User and to prevent or discover fraud or abuse against the website. Data are automatically stored and may also include personal data (IP address) that could be used to block any attempt of damage to the website itself or other users, or harmful activities or constituting a crime. These data are never used to identify or profile the user and are erased periodically. No explicit consent is required.
- **Secondary activities**
  Provide data to third parties to allow them to carry out technical and logistical activities or different activities on behalf of the Company. Suppliers have access only to the personal data required to carry out their tasks, and are engaged not to use data for other purposes and are obliged to process personal data in accordance with the present law.

**D) Legal basis**

Our website uses data mainly on the basis of the user consent. Consent is given through the banner placed on the bottom of the page, or through the use of the website – as a conclusive behaviour. By using or visiting the website the user approves the Privacy Policy and accepts the Processing of personal data with respect to the modalities and purposes described therein, including the potential dissemination to third parties if necessary to provide a service. Through the communication or demand for service forms, further consent related to the specific purpose of the services is collected.

**E) Nature of consent to data processing**

Consent to collect and process data is optional. You can refuse to give consent or withdraw a previously given consent at any moment (using the banner placed at the bottom of the page or the cookie browsing settings). However, refusal of consent may prevent from providing some services and the browsing experience through the website may be compromised.

**F) Location of data processing**

Processing related to the web services of this website are carried out in the abovementioned headquarters of the Company and are developed by highly qualified technical staff of the Office in charge of the processing, or by people that are occasionally in charge of maintenance.

**G) Communication of personal data**

The Company disseminates the user’s personal data within the limits and conditions described in this Privacy Policy and in the statement published when you gave your data, and, in any case, in accordance with the consent you gave during the collection of data, if required by the Privacy Code.

The Company may ask third parties to carry out specifically required services. These third parties are only given the necessary information to complete the relative functions; your personal data are processed by these third parties for the same purposes for which they were collected.

Within the organisation of the Company your personal data are only accessible to the persons concerned with respect to their role and as persons in charge of the processing, to answer your questions or send you the information required.

Your personal data will not be given to third parties for marketing and/or non-profit making purposes and will not be disseminated in any way.
H) Modalities to process data
Your personal data are processed by automated means for the strictly necessary time to achieve the purposes for which they were collected. Specific security measures are applied to prevent from losing data, illicit or incorrect use or unauthorised access.

I) Data retention period
The data collected from the website during operation are stored for the necessary time to carry out the abovementioned activities. After that time, data will be erased or stored anonymously, unless there will be further purposes for their retention.

Data (IP addresses) used for the website security (block an attempt to damage the website) are stored for six months.

Cookies can be stored for different periods of time depending on the purpose for which they are processed by the Company, or by third party companies, in compliance with the privacy legislation applicable from time to time. Temporary session cookies are active for the duration of the session, persistent cookies have a period of validity up to twenty-four months, while for third-party cookies the retention period is indicated by the third parties in the relevant websites, accessible through the dedicated links in the table and / or by consulting the sites http://www.youronlinechoices.com/ and http://www.allaboutcookies.org/.

J) Transfer of personal data to non-EU Countries
The website could share some of the data collected with services located outside the European Union area. In particular with Google, Facebook and Microsoft (LinkedIn) through social plugin and the Google Analytics service. Transfer may be authorised on the basis of specific decision of the European Union and of the Data Protection Supervisor, for which further consent is not required. The abovementioned companies guarantee their accession to the Privacy Shield. In this case, the Data Controller ensures that the transfer of non-EU data will be carried out in accordance with the applicable legal provisions under art. 44 and following of the GDPR.

K) Data subjects’ rights
Within terms and conditions provided by the present law, acting as a Data subject, you may exercise the following rights:

a) ask for confirmation of the presence of your personal data (right to access);
b) know their origin;
c) receive an intelligible communication;
d) receive information about the processing logic, modalities and purposes;
e) ask for update, rectification, integration, erasure, transformation into anonymous form, withdrawal to grant consent of data processed infringing rules of law, including data that are no longer necessary in relation to the purposes for which they were collected;
f) if processing is based upon consent, receive to the actual cost of the eventual support, data that have been given to Data Controller, in a structured, commonly used and machine-readable format;
g) right to lodge a complaint to the Italian Data Protection Authority;
h) and, more in general, exercise all the rights provided by the present law.

Taking into consideration the technical development of this topic and of the web tools designed for privacy reasons, the Company is committed to periodically update this document, which has to be considered as the Website e Cookie Policy.