



LA PIZZA+1 S.p.A.

Via Galileo Galilei, 11/13 - Loc. Gariga
29027 Podenzano
Piacenza
Italy

Telefono: +39 0523 042411

Fax: +39 0523 524931

Sito web: www.lapizzapiuuno.it

e-mail: info@lapizzapiuuno.it

CODICE FISCALE E PARTITA IVA IT01200110334 - R.E.A. DI PIACENZA 142139 - REGISTRO IMPRESE DI PIACENZA n. 01200110334 - CAPITALE SOCIALE € 1.000.000,00 i.v.

PRIVACY POLICY

Information provided pursuant to Article 13 of EU Regulation 2016/679 (hereinafter GDPR) and Article 13 of Italian Legislative Decree 196/2003 "Personal Data Protection Code" (hereinafter Code)

This page describes the **privacy policy** adopted by the company La Pizza +1 S.p.A. in relation to the treatment and processing of personal data both via the company website and in the course of normal operations. The term **personal data** is used to refer to any information relating to an identified or identifiable natural person.

In the event that the information provided is not clear or detailed enough, you can:

- contact the Data controller using the contact details provided;
- consult the website for the Italian Data Protection Authority (www.garanteprivacy.it).

1) GENERAL INFORMATION, VALID FOR ALL DATA PROCESSING:

Data subjects are informed of the following general profiles, which are valid for all areas of processing:

- all the data of the subjects with whom we interact are processed in a legal, fair and transparent manner, in accordance with the general principles set out in Article 5 of the GDPR and in Article 11 of the Code;
- specific security measures are observed to prevent the loss, unlawful or unfair use of data and unauthorised access, pursuant to Article 32 of the GDPR and Article 31 of the Code.

• **The data controller** is the company, as acting through its pro tempore legal representative, for which a person has been appointed as the Processor of personal data.

• For any other information, or to exercise your rights as outlined in Art. 7, you can contact the Controller/Processor using the following contact details:

- **Tel:** +39 0523 042411
- **Fax:** +39 023 524931
- **Email:** info@lapizzapiuuno.it
- **Address:** Via Galilei, 11/13 Fraz. Gariga – 29027 Podenzano (PC)

• Data subjects can at any time, without a formal procedure, request the personal details of the appointed **Processors of personal data**. It is also possible to request the disclosure policy of personal data, obtaining precise details on any **third parties** which act as independent Processors, Officers or Controllers of personal data (consultants, technicians, etc.).

• In summary, Article 7 et seq. of the Civil Code guarantees data subjects the right to access their own personal data, request for it to be corrected, updated or deleted if incomplete, incorrect or collected in violation of the law, as well as the right to object to the processing of their personal data for legitimate reasons.

Full text: (<http://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/1311248>).

• In general, any data processing is governed by the principles of **lawfulness, fairness and transparency**, ensuring the rights of individuals by means of adequate protection and safeguarding of data (though security measures aimed at preventing the loss, illicit or unfair use of personal data and unauthorised access).

References and rights of data subjects

• The data controller is the company, acting through its pro tempore legal representative. In order to ensure adequate support for data subjects, the controller has appointed a DPO, who can be contacted (contact details: Dott. Gregorio Galli – +39 0523

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010250 – info@gallidataservice.com) to exercise all their rights set out in articles 15-21 of the GDPR and in Article 7 of the Code (right of access, rectification, erasure, restriction, portability, objection), as well as to withdraw previously granted consent. In the event of a lack of response to their requests, data subjects can lodge a complaint with the supervisory authority for the protection of personal data (GDPR – Article 13, subparagraph 2, point d).

2) SPECIFIC INFORMATION RELATING TO THE PROCESSING OF PERSONAL DATA IN VARIOUS CONTEXTS:

2.1) DATA AUTOMATICALLY COLLECTED BY THE WEBSITE: The IT systems and designated software procedures for the functioning of the website obtain, during the course of their normal activity, some personal data whose transmission is implicit in internet communication protocols. This information is not collected to be associated with identified individuals but, by its very nature it could, through processing and elaboration in relation to data held by third parties, allow for users to be identified. This category of data includes IP addresses or domain names of computers used by visitors to the site, URI (Uniform Resource Identifier) addresses of requested resources, the time of the request, the method used to supply the request to the server, the size of the file received in response, the numerical code indicating the status of the reply given by the server (successful, error, etc.) and other parameters relating to the operative system and the user's device. This data is used only for the purpose of obtaining anonymous statistical information about how the website is used and to monitor its correct functioning, and is deleted immediately after being processed. This data can be accessed by internal officers or third parties who provide website support services. The data can be used to verify responsibility in the hypothetical event of cybercrime affecting the website, and may therefore be supplied by request to the Judicial Authority.

Purposes and legal basis for processing (GDPR – Article 13, subparagraph 1, point c)	These data are used for the sole purpose of obtaining statistical information on the use of the website and to monitor its correct functioning. The data may also be used to establish responsibility in the hypothetical event of computer crimes to the detriment of the website (legitimate interest of the controller).
Scope of communication (GDPR – Article 13, subparagraph 1, points e and f)	Data may only be processed by internal staff, duly authorised and trained in data processing (GDPR – Article 29), or by potential subjects responsible for the maintenance of the web platform (appointed in such instances as external managers), and they will not be communicated to other subjects, or distributed or transferred to extra-EU countries. Only in the event of an investigation may they be made available to the competent authorities.
Period for storing data (GDPR – Article 13, subparagraph 2, point a)	Data are normally kept for brief periods of time, except in the event of extensions connected with investigations.
Transfer (GDPR – Article 13, subparagraph 2, point f)	Data are not transferred by the data subject but are obtained automatically by the website's technological systems.

2.2) COOKIES

What are cookies: Cookies are small pieces of text (letters and/or numbers) which allow the web server to store information on the browser which can be reused during the visit to the website (session cookies) or, subsequently, also in visits at a later date (persistent cookies). Cookies are stored, depending on the user's settings, by the single browser on the specific device used (computer, tablet, smartphone). Similar technology, like for example web beacons, clear GIFs and all forms of local storage introduced with HTML5, are utilised to collect information about the user's habits and the use of services. In the rest of this text, we will refer to cookies and all similar technology with the general term "cookies".

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Potential types of first-party cookies and how to manage your preferences

CATEGORY	PURPOSE	MANAGEMENT OF PREFERENCES
Technical – navigation or session	To ensure the normal navigation and use of the website	Via the main navigation browsers, you can: <ul style="list-style-type: none"> • Block the receipt of all (or some) types of cookies by default • View the analytical list of cookies used • Remove all or some of the cookies installed For information on individual browser settings, please see the specific paragraph. Please note that blocking or cancelling cookies could compromise the navigation of the website.
Technical – analytical	To collect information on the number of visitors and on the pages viewed	
Technical – functionality	To allow for navigation on the basis of a series of selected criteria	
Profiling	To create profiles relating to the user in order to send advertising messages in line with their preferences	

The website may contain links to third-party websites and third-party cookies. For more information, please view the privacy policies of any linked websites.

Management of preferences through main navigation browsers Users can decide whether or not to accept cookies by using their own browser settings (please note that, by default, almost all web browsers are set to automatically accept cookies). Settings can be altered and defined specifically for different websites and web applications. Furthermore, the best browsers allow different settings to be defined for “proprietary” cookies and those of “third parties”. Usually the configuration of cookies occurs from the menu “Preferences”, “Tools” or “Options”.

EXAMPLES OF COOKIES USED ON THE WEBSITE

Technical cookies: These types of cookies are necessary for the smooth functioning of some areas of websites. These types of cookies include both persistent cookies and session cookies. Without these cookies, the website, or part of it, may not function properly.

Analytical cookies: These types of cookies are used to collect information about how the website is used. The Controller uses this information for statistical analyses, to improve the website and simplify its use, as well as to monitor its correct functioning. This type of cookie anonymously collects information about users’ activity on the website, how they reach the website and which pages they visited. These types of cookies are sent by the website itself or by thirdparty domains (Google Analytics: the user can selectively disable Google Analytics by installing the opt-out app provided by Google Analytics on their browser and available from the following link <https://tools.google.com/dlpage/gaoptout> For further information, consult the following link: <https://www.google.it/policies/privacy/partners/>)

Some websites may contain links to company pages on social media networks which may entail the use of cookies on the site itself or may use plug-ins that install cookies. At the following links you can view the cookies policies of these sites and manage your settings:

- **Twitter** (policy): <https://support.twitter.com/articles/20170514>
- **Twitter** (settings): <https://twitter.com/settings/security>
- **Facebook** (policy): <https://www.facebook.com/help/cookies/>
- **Facebook** (settings): account settings – privacy section
- **Youtube**: <https://www.youtube.com/?hl=it&gl=IT>
- **Linkedin** (policy): <https://www.linkedin.com/legal/cookie-policy>
- **Linkedin** (settings): <https://www.linkedin.com/settings>
- **Google+** (policy): <http://www.google.it/intl/it/policies/technologies/cookies/>
- **Google+** (settings): <http://www.google.it/intl/it/policies/technologies/managing/>

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Managing your settings using the major internet browsers Users can decide whether or not to accept cookies via their browser settings (please note that, by default, almost all web browsers are set to automatically accept cookies). Settings can be adjusted and defined specifically for various websites and web applications. Furthermore, the best browsers allow you to apply different settings for first party and third party cookies. Cookies settings are normally found under the menu heading "Preferences", "Tools" or "Options". The following are links to guides for managing cookies on the major browsers:

Internet Explorer: <http://support.microsoft.com/kb/278835>

Internet Explorer [mobile version]: <http://www.windowsphone.com/en-us/how-to/wp7/web/changing-privacy-and-otherbrowser-settings>

Chrome: <http://support.google.com/chrome/bin/answer.py?hl=en-GB&answer=95647>

Safari: <http://docs.info.apple.com/article.html?path=Safari/5.0/en/9277.html>

Safari [mobile version]: <http://support.apple.com/kb/HT1677>

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

Android: <http://support.google.com/mobile/bin/answer.py?hl=en&answer=169022>

Opera: <http://help.opera.com/opera/Windows/1781/it/controlPages.html#manageCookies>

Further information

- www.allaboutcookies.org (for more information about cookies and how they work)
- www.youonlinechoices.com/it/a-proposito (allows users to object to the installation of the main profiling cookies)
- www.garanteprivacy.it/cookie (details of the main regulations on privacy by the Italian Data Protection Authority)

Specific services

The website may contain data collection forms to ensure the visitor any services/functions (e.g., requests for information, registration, etc.).

Purposes and legal basis for processing (GDPR – Article 13, subparagraph 1, point c)	Required contact and identifying data may be requested to be able to respond to data subjects' requests. Sending a request is subject to specific, free and informed consent (GDPR – Article 6, subparagraph 1, point a).
Scope of communication (GDPR – Article 13, subparagraph 1, points e and f)	Data are processed exclusively by staff who are duly authorised and trained in data processing (GDPR – Article 29), or by potential subjects responsible for the maintenance of the web platform or supply of the service (appointed in such instances as external managers). Data will not be distributed or transferred to extra-EU countries.
Period for storing data (GDPR – Article 13, subparagraph 2, point a)	Data are kept for periods of time that are compatible with the purpose of their collection.
Transfer (GDPR – Article 13, subparagraph 2, point f)	The provision of data relating to mandatory fields is necessary in order to be able to receive a response, while the optional fields are designed to provide staff with further useful elements to facilitate contact.

Data provided voluntarily by the user

The optional, explicit and voluntary sending of e-mails and/or regular post to the addresses on this website entails the subsequent acquisition of the sender's address, which is necessary to respond to the request, as well as any other personal data included in the message. Should the sender supply their CV to submit their professional application, they are solely responsible for the relevance and accuracy of the data sent. Please note that any CVs without authorisation for data processing will immediately be deleted.

2.3) DATA PROVIDED BY THE USER VIA THE WEBSITE'S CONTACT FEATURES Some sections of the website (contacts page, etc.) require the user to fill in some personal data. This data will be used only for the purpose of replying to the user's

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request. The provision of this data is necessary in order to properly respond to any requests. This data will be stored for the necessary period of time for this purpose and then deleted. This data may be passed on to third parties only when it is necessary in order to provide an adequate response to the data subject. The optional, explicit and voluntary sending of emails to the addresses on the site involves the subsequent obtaining of the sender's email address, which is necessary to be able to reply to requests, in addition to any other personal data included in the message.

2.4) NEWSLETTERS AND COMMERCIAL COMMUNICATIONS Commercial and promotional information is only sent (by post, email, newsletters, telephone and SMS) to those individuals who have expressed an interest in receiving information from the company. For email communications, there may be the exception of so-called "soft spam", as outlined in Art. 130, paragraph 4 of Legislative Decree 196-2003 which states that it is possible to send commercial information relating to applicable services/products that are similar to those purchased without consent from the data subjects. Consent can be freely withdrawn at any time, also by using the dedicated disclaimers inserted in any promotional messages.

2.5) PROFESSIONAL APPLICATIONS

Any data collected through the submission of CVs will be used for the procedures of staff selection. This data will be stored for the necessary period of time and adequately safeguarded to prevent loss or unauthorised access. This data will not be distributed or passed on to third parties. This data management will be the same for professional applications sent to the company's addresses (electronic or ordinary). At the time of hiring, the candidate will receive regular information which relates to the established professional relationship.

2.6) DATA COLLECTED IN THE COURSE OF NORMAL COMPANY OPERATIONS (FROM CLIENTS / SUPPLIERS)

Identifiable data, as well as any other necessary information for fulfilling a contract, will be collected from the data subject. Personal data is processed as part of the normal operations for necessary purposes relating to the management of ongoing contractual relations, as well as the fulfilment of accounting, fiscal or legal obligations. Personal data is processed using electronic or paper-based tools, strictly for the necessary time period to fulfil the purpose for which the data has been collected. Specific security measures are employed to prevent the loss, illicit or unfair use and unauthorised access of the data. The provision of this data is necessary and the refusal to provide this data could result in the partial or complete failure to execute the contract. Personal data supplied or collected during the fulfilment of the contract may be passed on to third parties which carry out functions connected to or necessary to our operations, such as:

- external professionals used by the company for consultancy (legal, fiscal, accounting, administration and employment regulations);
- banks and credit institutions, transport companies;
- partner companies for the completion of development operations and the sales of services;
- data subjects may, at any time, without a formal procedure, request a list of the third parties that may have access to data (as independent Processors, Officers or Controllers of data).

3) DATA PROCESSING RELATING TO RELATIONSHIPS ESTABLISHED WITH CUSTOMERS AND SUPPLIERS

3.1 Data processing subject

The company processes personal identifying data of customers/suppliers (for example, first name, surname, company name, company/tax details, address, phone number, e-mail address, bank and payment details) and of their operational referents (first name, surname and contact details) obtained and used in the provision of the services supplied.

3.2 Purposes and legal basis for data processing

Data are processed to:

- conclude contractual/professional relationships;
- fulfil pre-contractual, contractual and tax obligations deriving from existing relationships, as well as to manage the necessary communications connected with them;
- fulfil obligations provided for by law, by a regulation, by Community legislation or by order of the authorities;

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- exercise a legitimate interest as well as a right of the controller (for example: the right to defence in court, the protection of credit positions; ordinary internal needs of an operational, management and accounting nature).

Failure to provide the abovementioned data will make it impossible to establish a relationship with the controller. Pursuant to Article 6, subparagraphs b, c and f, the abovementioned purposes represent a suitable legal basis for the lawfulness of data processing. Should there be the intent to carry out data processing for other purposes, a specific consent form will be requested from the data subjects.

3.3 Data processing method

The processing of personal data is carried out by means of the operations indicated in Article 4, subparagraph 2 of the GDPR, specifically: collection, recording, organisation, storage, consultation, elaboration, alteration, selection, retrieval, alignment, use, combination, blocking, disclosure, erasure and destruction of data. Personal data are subjected to both paper-based and electronic and/or automated processing. The controller will process the personal data for the time necessary to fulfil the purposes that they were collected for and related legal obligations.

3.4 Scope of data processing

Data are processed by internal subjects who have been duly authorised and trained pursuant to Article 29 of the GDPR. Furthermore, the scope of communication of personal data can also be requested, obtaining precise indications on any external subjects that operate as independent processing controllers or managers (consultants, technicians, banking institutions, operators, etc.).

4) POLICY UPDATES

Please be aware that this document may be subject to regular review, also in relation to the reference law and legislation. In the event of significant alterations, it will be highlighted adequately on the website's homepage for a reasonable period of time. Nevertheless, the data subject is invited to consult this policy regularly.

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UNI 11020 Certificato n. 146/001

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