



PRIVACY POLICY OF THE WEBSITE WWW.BALOCCO.IT

The protection of our users' personal data is of fundamental importance to us. This privacy policy statement contains all the information users require to find out which data we collect, why we collect them and how we process them, in compliance with the relevant legislation (Italian Legislative Decree 196/03, as amended by Legislative Decree 101/18 and by the General Data Protection Regulation (EU) 2016/679, known as the GDPR).

For any queries, the Data Controller can always be contacted at the addresses provided in table 1. We will get back to you as quickly as possible.

1. Contacts

Table 1 provides the Data Controller's details and specifies the channels by which it can be contacted:

tab.1

Data Controller	Balocco S.p.A.
Postal address	Via Santa Lucia 51 – 12045 Fossano (Cuneo, Italy)
Ordinary email address	info@balocco.it
Telephone	0172 653411

In the privacy policy statement which follows, Balocco S.p.A. may also be referred to as the "Data Controller" or "Balocco".

Balocco has designated a Data Protection Officer (DPO), Mr Cesare Vidotto, whose contacts are as follows:

tab.3

Data Protection Officer	Samuele Allasia
Ordinary email address	dpo@balocco.it

2. Data processed

2.1. Data collected via the Service

The Data Controller only collects the personal data that the user contributes voluntarily by using the Website, or technical information relating to use of traffic analysis systems, or necessary for the correct operation of the website itself.

The data acquired further to voluntary contribution by the user through the use of the Service may include the following personal data:

- name;
- surname;
- tax code;
- home address;
- date of birth;
- email address.

2.2 Data collected via the Website

The user does not need to contribute any personal data in order to consult the “public” part of the Website (i.e. the part that may be freely accessed by all users).

However, some browsing data may be automatically collected as users merely browse through the public pages of the Website, including:

- IP addresses;
- URI- Uniform Resource Identifier- addresses of the resources requested;
- times when requests were submitted to the server and method used;
- numerical code referring to the status of the reply sent by the server (success, error, etc.);

Browsing data relate to the user’s operating system or IT environment, and their transmission is inherent in the use of Internet communication protocols.

The Data Controller uses a third-party tool (Google Analytics) to analyse browsing data, for statistical and marketing purposes only. In all cases, data are processed in completely anonymised form. Although these data are not collected for association with identified data subjects, by their very nature, when processed or associated with data held by third parties, they might allow users to be identified. These data are used for the sole purpose of obtaining anonymous statistical information concerning use of the Website and checking that it is operating correctly and they are deleted immediately after processing.

For access to the part of the Website with reserved contents, or for any contact with the Data Controller on the part of the user, through, for example, the sending of email messages to the company addresses provided on the Website, the user's data shall be considered to have been collected and therefore processed in full compliance with current law. These data may also include those provided during user registration on the Website and for use of the reserved areas, such as (in addition to the personal data already referred to) username, password, security questions and the relative answers, any documents uploaded, etc.

The first time the user visits the site, a banner with a short-form privacy policy statement concerning use of cookies is presented; users are able to agree to it and give their consent.

In order also to maintain a constant presence on the most widely used social media networks, the www.balocco.it website offers users links to preset channels on:

Facebook;
Instagram;
YouTube.

Data subjects may contact the Data Controller via the complaints platform provided at the address consumatori.balocco.it. Users connecting to this platform will be shown a new privacy policy statement, specifically for this service.

This platform assumes that the user contributes the following data:

- Name;
- Surname;
- Address;
- Town;
- Postcode;
- County;
- Email;
- Telephone;

The data subject may also contact the Data Controller via the communication channels provided, listed in table 1 of this privacy policy statement.

On this occasion, unsolicited or through the use of various communication techniques, he/she may provide various data, such as, for example:

- Email address (inherent in the sending of the request);
- Telephone number (in case of contact via this channel);
- Name;
- Surname

3. Purposes of the processing

Balocco S.p.A. processes the personal data the user has supplied via the Service or the Website solely in relation to the use of the Service or the Website itself.

In particular, the user's personal data may be processed for the following purposes:

- Management and optimisation of the website;
- Granting access to specific functions of the Service website (such as registration, access to reserved areas, communication with the Data Controller);
- Management of the security of the website itself and reduction of the risk of possible attacks.

The purposes listed above rest on the following legal bases:

- Lawful interest of the Data Controller: for management of the website and traffic analysis;
- Consent of the data subject: for the use of specific cookies;
- Lawful interest of the Data Subject: for management of the complaints process.

Balocco will not use the data supplied for purposes other than those listed above, to which the data subject concerned has agreed, and will only use them within the limits stated in any additional specific privacy policy statement issued to accompany any other, specific service requested by the user.

The Data Controller will never sell, lease or in any way transfer the user's data to third parties. The user is the sole proprietor of his/her data and may request their amendment or erasure at any time: see "rights of the data subject" section below.

4. Storage of personal data

The Data Controller will store the user's personal data for the periods required by current legislation, and, in all cases, for all the time needed for the provision of the services requested.

After this period of time, the user's data will be definitely erased (subject to legal obligations).

5. Security and transfer of personal data

The user's data collected via the Service and the Website are transferred, stored and processed using suitable technical measures, calculated to reduce the risks to them.

Users' data are collected, filed and stored on a secure server in Europe (Italy) and the connection to data subjects is made using the HTTPS protocol in order to encrypt it and increase levels of protection.

6. Transfer of data to third parties

The Data Controller does not disseminate the personal data processed. However, it may disclose the user's data to third parties for some processes, such as the development of new functions, analysis of the performances of the site or server, implementation of new security measures and the management of disputes.

Personal data will only be supplied to the competent Authorities when the Data Controller is obliged to do so by law.

7. Transfer of data abroad

The data processed will not be transferred to countries outside the European Union. In the event that software or procedures require any such transfer in the future, the Data Controller will ensure that transfer is only to countries which guarantee a satisfactory security level, also proven via adequacy decisions, standard contractual clauses or BCR (Binding Corporate Rules).

8. Rights of the user (data subject)

The user will be able, at any time, to exercise the rights envisaged by current legislation, including:

- Right to access or obtain a copy of the data: the data subject is entitled to know whether the Data Controller possesses data concerning him/her, origin, purposes and categories of the data collected, the recipients to which the data are sent (both inside and outside the EU), and whether or not any automated decision-making processes or profiling applies, in addition to the data storage period.
- Right to rectification and erasure of your personal data: the data subject may request the Data Controller to amend, update, supplement or erase the data it holds;
- Right to restriction of processing: the data subject may request the Data Controller to restrict access to the data in its possession, or no longer to make them available for the various types of processing.
- Right to withdraw consent: the data subject may withdraw consent to the processing of the data at any moment, without prejudice to the lawfulness of the processing.
- Right to portability of data: the data subject may exercise this right if the processing is necessary for the fulfilment of a contract and he/she has consented to the processing of the data. The data subject may ask for the data to be sent to him/her in a clear format, legible by a computer not fitted with proprietary software, or, if technically feasible, for them to be automatically transmitted to the new Data Controller.
- Right to lodge a complaint: the data subject may lodge a complaint with the Data Controller or the Supervisory Authority.
- Right to object

The data subject may object to the processing if his/her interests prevail over the legitimate interest of the data controller.

Data subjects may exercise one or more of the rights listed above by contacting the Data Controller using the contacts provided in table 1.

9. Cookies

For information concerning the use of cookies via the Website, please read the Cookie Policy provided at: https://www.balocco.it/assets/download/cookie_en.pdf