

WEBSITE PRIVACY POLICY

As provided for in European Regulation 679/2016 on the protection of personal data, we provide below, pursuant to Articles 13 and 14, information on the processing of personal data

1. Data controller

NETTUNO SRL, Viale Industria 16/18, Castelli Calepio (BG), CF and VAT no. 01568950164, Tel. 035.847508.

2. Type of data processed

The personal data processed by the Company include, but are not limited to, the following categories of data relating to the Customer:

- I. **personal data** provided to receive a specific service (e.g. name and contact information);
- II. **browsing data** (e.g. IP address, location - country, information about the pages visited by the user within the website, time of access to the website, time spent on each page, click stream analysis. Although the Company does not collect such information in order to associate it with specific users, it is still possible to identify such users directly through this information or by using other information collected);
- III. **cookies** (i.e. small text files that may be sent and recorded on the user's computer by the websites visited and then sent back to the same sites when the user visits them again. See the website's Cookie Policy for details).

3. Purpose of processing

Data is processed by the Company in the course of its economic and commercial activities for the following purposes:

- a) to execute a specific user request or provide the requested service ('Service');
- b) for the analysis and improvement of the services and products offered;
- c) to send marketing communications by e-mail on services and products similar to those provided, it being understood that you will have the opportunity to object to such communications at any time;
- d) to engage in market research or other initiatives to test satisfaction with products and services through automated communication tools such as e-mail, automated messages and other remote communication tools;
- e) to perform an analysis of preferences, activities and purchasing habits, in order to send the marketing communications indicated above. (*Marketing Purposes*);
- f) in order to carry out communications for Marketing Purposes pursuant to this Policy, of non-invasive forms of segmentation based, inter alia, on categories such as the professional category of membership, the city/province/region in which it is based and the type of service and/or product provided by the Company. (*Purposes of Legitimate Marketing Interest*).

4. Treatment modalities

Data may be processed on paper, by automated or electronic means, including mail or e-mail, telephone (e.g. automated calls, SMS, MMS), fax and other means (e.g. websites, mobile apps).

5. Data recipients

The Data may be processed by natural persons and/or legal entities operating on behalf of the Company and by virtue of specific contractual obligations and based in EU or non-EU countries.

Data may be communicated to third parties to fulfil legal obligations, to comply with orders from public authorities or to exercise a right of the Company before judicial authorities.

6. Transfer of Data Abroad

Data may be freely transferred outside the national territory to countries within the European Union. Should the Customer wish to obtain further information about the guarantees in place and request a copy of them, he may contact the Company at any time in the manner indicated in this notice.

7. Links to third-party websites

Third-party websites accessible from this website are the responsibility of the third party. The Company disclaims all liability for requests and/or transmission of personal data to third-party websites.

8. Data Retention

The Data processed to provide the Service and obtain Customer Satisfaction will be retained by the Company for the period considered strictly necessary to fulfil these purposes. However, the Company may continue to retain such Data for a longer period to the extent necessary to protect the Company's interests relating to potential liability related to the provision of the Service.

Data processed for Marketing and Profiling purposes will be retained by the Company from the time you provide consent until you revoke it. Once your consent is withdrawn, the Data will no longer be used for these purposes, although it may still be retained by the Company, in particular to the extent necessary to protect the Company's interests relating to potential liability related to such processing unless further clarification is provided by the relevant supervisory authority in this regard.

Data processed to improve the user experience on the websites will be retained for the periods indicated in the Company's Cookie Policy.

9. Customer Rights

In relation to the processing of Data described in this notice, the Customer may exercise at any time, the rights provided by the GDPR (Articles 15-21), including:

- receive confirmation of the existence of the Data and access to their content (right of access);
- update, amend and/or correct the Data (right of rectification);

- request the deletion or limitation of the processing of Data processed in breach of the law, including Data whose retention is not necessary in relation to the purposes for which the Data were collected or otherwise processed (right to be forgotten and right to limitation);

object to the processing (right to object);

- revoke consent, where given, without prejudice to the lawfulness of the processing based on the consent given before revocation;
- lodge a complaint with the Supervisory Authority (Data Protection Authority www.garanteprivacy.it) in the event of a breach of data protection regulations;
- receive an electronic copy of the Data concerning him/her, in order to transfer them to himself/herself or to a different service provider, in cases where the Company processes such Data on the basis of his/her consent or on the basis of the circumstance that the processing is necessary for the provision of the services and/or products requested and the Data are processed by automated means (right to data portability).

To exercise these rights, the Customer may contact the Data Protection Officer, who can be contacted by sending a request to nettuno@nettuno.net, or by addressing the communication by post to:

Neptune Ltd.

Viale Industria 16/18

24060 Castelli Calepio (BG)

c.a.: Data Protection Officer

When contacting us, the customer should make sure to include his or her name, e-mail/postal address and/or telephone number(s) to ensure that his or her request can be handled properly.

10. Changes and updates

This Privacy Policy came into force on 24/05/2018.

The Company reserves the right to amend the Privacy Policy in part or in full or simply to update its content (e.g. due to changes in applicable legislation). The Company will publish any updates on this website.

Castelli Calepio, 6 February 2019