1. **PRIVACY POLICY LEONEALATO.NET (the “Site”)**
2. In carrying out its activities, Leone Alato SpA carries out the processing of personal data in accordance with the legislative and contractual provisions in force, in a manner based on the principles of fairness, lawfulness and transparency, protecting the confidentiality of the person concerned and his rights.
3. Navigation on the Site is free and does not require registration except in case the user is interested in using some services for which it is necessary to provide some personal data.
4. **1. DATA CONTROLLER AND DATA PROCESSOR**
5. Through this document, Leone Alato SpA, as the data controller of personal data (hereinafter, “Data Controller”), intends to provide the information referred to in Articles 13 et seq. of the EU Regulation 679/2016 (hereinafter, the “Regulation”), with reference to the processing of personal data of users (hereinafter, “User/Users”) who consult the website www.leonealato.net (hereinafter, “Site”). To obtain information about your personal data collected, the purposes and the entities with which the data is shared, please contact the Data Controller.
6. Data Controller and Data Processor.
7. Winged Lion SpA Via Trento, 8
8. 34132 TRIESTE (TS) - Italy
9. Owner's e-mail address: privacy@leonealato.net
10. **2. TYPES OF DATA COLLECTED**
11. a) Navigation data: the computer systems and software procedures used to operate this Site acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols. This information is not collected to be associated with identified interested parties, but by its very nature could, through processing and association with data held by third parties, allow users to be identified. This category of data includes the IP addresses or domain names of the computers used by users who connect to the Site, the URI (Uniform Resource Identifier) notation addresses of the resources requested, the time of the request, the method used in submitting the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the User's operating system and computer environment. These data are used for the sole purpose of obtaining anonymous statistical information on the use of the Site and to check its correct functioning and are deleted immediately after processing. The data could be used to ascertain responsibility in case of hypothetical computer crimes against the Site: except for this eventuality, at present the data on web contacts do not persist for more than seven days.
12. b) Data voluntarily provided by the user through the “contact” section and sending an email to info@leonealato.net: sending a contact email, involves the processing of the user's data, with

the sole purpose of responding to the request and fulfilling related administrative obligations. The data being processed are: name, e-mail.

1. c) Data provided voluntarily by the user for the sending of promotional communications related to products, events and initiatives of LEONE ALATO in the event that the Interested Party subscribes to the newsletter service or expresses his or her consent to receive commercial communications from the Data Controller, the data will be processed for the purpose of sending such communications by e-mail or regular mail, to the addresses provided by the Interested Party. The data subject to processing are: name, e-mail, domicile.
2. d) Cookies: for the processing of data through cookies, please see the relevant EXTENDED [COOKIE policy](https://www.briccodeiguazzi.it/sites/default/files/2023-12/Informativa%20Cookie%20-%20Leone%20Alato_0.pdf).

**3. PURPOSE AND LEGAL BASIS FOR PROCESSING**

The Users' data collected will be processed by the Data Controller:

- OPERATION OF THE SITE: to pursue a legitimate interest of the Owner's own, consisting in ensuring the security of the Site and of the information exchanged on it, i.e. the ability of said Site to withstand, at a given level of security, unforeseen events or unlawful or malicious acts that compromise the availability, authenticity, integrity and confidentiality of the personal data stored or transmitted and the security of the related services offered or made accessible. The legal basis for the processing is Article 6(1)(f) of the Regulations.

- USE OF THE CONTACT SERVICE: to respond to requests sent by the Data Subject. The legal basis of the processing is Art. 6, par. 1, lett. a) of the Regulation being the processing necessary for the performance of the contract to which the data subject is a party;

- SENDING COMMERCIAL /PROMOTIONAL COMMUNICATIONS, INVITATIONS TO EVENTS / WORKSHOPS OF THE DATA CONTROLLER: in the event that the Data Subject has given his/her explicit consent, in order to send invitations to events organized by the Data Controller or to send promotional communications of the activity of the Data Controller, including market research. The legal basis for the processing is Article 6(a) of the Regulations, i.e. the consent of the Data Subject;

- PROCESSING OF PURCHASES: all data necessary for the management of purchases. The legal basis of the processing is Art. 6, par. 1, lett. b) and c) of the Regulation being the processing necessary for the execution of the contract of sale to which the data subject is a party as well as to fulfill the related legal obligations, and manage the services related to purchases also in the after-sales phase.

**4. COMPULSORY OR OPTIONAL NATURE OF THE PROVISION OF DATA**

The provision of the data referred to in point 2, letter b) is optional. In case of refusal, however, the User will not be able to use the contact service.

The provision of data under point 2(c) is optional. Users may revoke their consent at any time and without giving reasons. The easiest way to do so is to click on the “Unsubscribe” link found in every newsletter or communication received. Alternatively, the user may send a communication to the Controller at Via Mons. P.L. Zovatto 71 30020 Loncon di Annone Veneto (VE).

The Processing of data referred to in point 2, letter d) will take place without the consent of the data subject.

**5. MODALITIES OF THE PROCESSING OF THE DATA COLLECTED**

The processing will be carried out both on paper and with telematic modalities, with the aid of modern information systems and with manual modalities, solely by subjects expressly appointed for this purpose. The processing will take place with logics and by means of forms of organization of the data strictly related to the above obligations, tasks or purposes. The Data Controller and the Data Processor use technical and organizational measures to protect the data in their possession against manipulation, loss, destruction and against access by unauthorized persons. Security measures are constantly improved according to technological development.

**6. SCOPE OF COMMUNICATION AND DISSEMINATION**

The User's personal data will be processed by parties authorized to perform such tasks, duly appointed as data processors or persons in charge of processing, equipped with security measures to ensure the confidentiality of the data subjects to whom the data refer and to prevent undue access to third parties or unauthorized personnel. Should it be necessary, the data collected may be communicated, within the limits strictly pertinent to the obligations, tasks or purposes referred to in point 3, to public or private entities (insurers, auditing and certification companies, etc.) or to the competent Authorities for the purpose of prevention, ascertainment or repression of crimes, in compliance with the regulations governing the matter. No data will be disclosed.

The updated list of all Data Processors is available at the headquarters of Leone Alato SpA and can be requested at the following e-mail address: privacy@leonealato.net. This list may subsequently be supplemented and/or updated as needed.

User data, stored on electronic media, are kept and archived on servers located in the European Union.

**7. RETENTION PERIOD**

The Data are processed and stored for the time required by the purposes for which they were collected. For the purposes referred to in Art. 2) above, Personal Data will be processed for the period strictly necessary for the pursuit of the aforementioned objectives and also subsequently, for the fulfillment of legal obligations and/or for purposes of a defensive nature. 4

Data provided for commercial communication activities, opinion polls and market research will be retained until the Data Subject's request to discontinue the activity or for 2 years. At the end of the retention period, the Personal Data will be deleted. Therefore, at the expiration of this period the right of access, deletion, rectification and the right to Data portability can no longer be exercised.

**8. USER RIGHTS**

Users may exercise certain rights with respect to the Data processed by the Data Controller. Users have the right to know their rights, consisting essentially in the right to receive from the other contractual party information regarding the existence of the processing of their personal data, as well as to access their data, to obtain their rectification, integration, updating, cancellation or blocking. In addition, the User will also have the right to obtain a copy of his/her data, limitation of processing and/or, again, to object to their processing, as well as the right to data portability and to lodge a complaint with the competent supervisory authorities under the conditions and within the limits indicated in Article 13 of the Regulations.

Each data subject is guaranteed the following rights set forth in Articles 15 et seq. of the Regulation: right to information; right of access of the data subject; right to rectification; right to erasure (right to be forgotten); right to restriction of processing; right to data portability; and right to object.

Thus, the User may know what personal data the Data Controller holds about him/her, their origin and how they are used, request that they be updated, corrected or supplemented, as well as, in the cases provided for by the provisions in force, cancellation, restriction of processing or oppose their processing. Each data subject may, if he or she so wishes, request to receive a copy of the personal data held by the Data Controller concerning him or her in an electronically readable format and, where technically possible, the Data Controller may transfer the data directly to a third party indicated by the Data Subject.

If the User believes that the processing of his or her personal data has been carried out unlawfully, he or she may file a complaint with one of the competent data protection supervisory authorities. In Italy, the complaint may be submitted to the Garante per la Protezione dei Dati Personali (http://www.garanteprivacy.it/).

**9. EXERCISE OF RIGHTS**

To exercise the above rights, Users may send a communication to the e-mail address privacy@leonealato.net, indicating in the subject line “Privacy - exercise of rights ”.

This Privacy policy was published on 03/10/24. Any updates will always be published on this page**.**