PRIVACY DISCLAIMER - PERSONAL DATA PROCESSING POLICY

Pursuant to art. 13 of Italian Legislative Decree No. 196 dated 30.6.2003, the sole shareholder company, Clouditalia Telecomunicazioni SpA, with headquarters in via Calamandrei 173 Arezzo, in its capacity as personal data holder, in the person of its legal representative, hereby informs you that the personal data you will provide may be processed directly or through third parties, to fulfil the contractual obligations and requirements under the laws, regulations, and EU standards.

Processing of personal data means the collection, recording, management, storage, elaboration, modification, selection, extraction, comparison, use, interconnection, blocking, communication, dissemination, cancellation and destruction, or the combination of two or more of these operations.

The data will be processed using suitable means designed to guarantee their security and confidentiality. This may be done using automated tools designed to store, handle and transmit the data.

Clouditalia is the personal data holder; therefore, it is responsible for their update and modification according to any variation notified. With reference to the processing of your personal data, you can exercise all the rights set forth in art. 7 of Italian Legislative Decree 196/2003. In particular, you will have the right:

- to receive confirmation as to the existence or non-existence of his/her personal data, even if they have not yet been recorded, and to their communication in an intelligible form.

- to obtain information on:
  - the origin of the personal data;
  - the purposes and methods of processing;
  - the logic applied in the case of data processing with the aid of electronic instruments;
  - the identity of the holder, managers and the appointed representative pursuant to art. 5, paragraph 2;
  - the subjects or categories of subjects to whom personal data may be disclosed or who may learn about them as appointed representative in the State, managers, or agents;

- to obtain:
  - the updating, rectification or, when interested, integration of data;
  - the cancellation, transformation into anonymous form or blocking of data processed unlawfully, including those that do not need to be kept for the purposes for which they were collected or subsequently processed;
  - certification that the operations in letters a) and b) have been notified, also as regards their contents, to those to whom the data were communicated or disseminated,
unless this requirement proves impossible or involves the use of resources manifestly disproportionate to the protected right;

- to object, in whole or in part:
  - for legitimate reasons the processing of personal data, although pertinent to the purpose of collection;
  - the processing of personal data for sending advertising or direct sales materials or for carrying out market research or communication.

The data will be deleted or modified following a certain period of time for each of the services listed above. You can exercise your rights above by sending your request via registered letter to the following address: Clouditalia Telecomunicazioni S.p.A., Via Piero Calamandrei 173, 52100 Arezzo.

Privacy Policy for website users

This Privacy Policy describes how to manage the websites managed by the sole shareholder company, Clouditalia Telecomunicazioni SpA, in relation to the processing of personal data of users who visit it.

This information notice is provided pursuant to art. 13 of Italian Legislative Decree 196/03 – Code concerning the protection of personal data – to all those who visit this website.

The website indicated above is owned by the sole shareholder company, Clouditalia Telecomunicazioni SpA (hereinafter Clouditalia).

Clouditalia is providing this information notice only for the websites it owns and manages and not for other websites or sections/pages/spaces owned by third parties linked to our websites.

Users/Visitors must read this Privacy Policy carefully before submitting any personal information and/or completing any electronic form on this website.

Processed data and purpose of the processing:

Browsing data

During their normal operation, the computer systems and software procedures used to operate this website acquire some personal data whose transmission is implicit in the use of internet communication protocols.

This information is not collected to be associated with identified parties, but by their very nature could, through processing and association with data held by third parties, allow users to be identified.

This category of data includes IP addresses or domain names of computers used by persons who connect to the site, the URI (Uniform Resource Identifier) of requested resources, the time of request, the method used to submit the request to the server, the size of the file received in reply,
the numerical code indicating the status of the reply given by the server (successful, error, etc.) and other parameters regarding the operating system and computer environment of the user. These data are only used to obtain anonymous statistics on site usage and to check its correct functioning. They are deleted immediately after processing. These data could be used to ascertain responsibility in case of hypothetical computer crimes against the site: currently, except for this possibility, data concerning web contacts is not kept for more than seven days.

Data provided voluntarily by the user

The optional, explicit and voluntary provision of personal data to access certain services or make requests via email entails Clouditalia’s subsequent acquisition of the sender’s email address or other personal data, which will be processed solely to respond to the request or provide the service.

Cookies

A cookie is a short text that a website you visit sends to your browser. It allows the website to store information regarding your visits, such as the preferred language and other settings. This facilitates your next visit and improves your browsing experience. Cookies play an important role. Without them, browsing the web would be a much more frustrating experience. Cookies, as defined by the Provision of the Privacy Guarantor (No. 229 dated 8 May 2014) can be of two types:

1) Technical Cookies: technical cookies are those required for providing electronic communication or for information services expressly requested by the subscriber or the user. They are not used for other purposes and are normally installed directly by the owner or manager of the website. They can be divided into navigation or session cookies, which ensure normal browsing of the website (for example, allowing users to make a purchase or log into restricted areas); analytics cookies, which are similar to technical ones when used directly by the manager of the website to collect aggregate information on the number of users and on how they visit the website; functional cookies, which allow the user to browse the website according to a series of selected criteria (e.g., language, products selected for a purchase) in order to improve the service provided. The installation of these cookies does not require the users’ prior consent, notwithstanding the obligation to provide the information notice pursuant to art. 13 of the Privacy Code.

2) Profiling cookies: profiling cookies aim at outlining user profiles and are used to send advertising messages in line with the preferences expressed while browsing the net. Given the particular invasiveness of these devices, European and Italian standards have established that users must be suitably informed about their use and express their consent.
How Clouditalia uses cookies

Clouditalia uses only technical cookies and, therefore, excludes profiling ones. In particular:

The website does not acquire any of the users’ personal data.

We do not use cookies to transmit personal information, nor do we use so-called persistent cookies, i.e. user-tracking systems.

The use of session cookies (which are not permanently stored on the user’s computer and disappear when the browser is closed) is strictly limited to the transmission of session identifiers (consisting of random numbers generated by the server) necessary to allow the safe and efficient use of the website.

The session cookies used in Clouditalia websites avoid using other information techniques that are potentially detrimental to the confidentiality of users’ browsing and do not allow the acquisition of personal identification data.

In order to know how our visitors use our website, we use services provided by Google and Google Analytics to collect, aggregate, and analyse the data. These cookies collect only anonymous data and have a limited duration. The information collected is used, for example, to monitor and analyse the use of the website, improve its functionality, and choose the content and graphic layout more accurately to meet visitors’ requirements. In any instance, if, for any reason, you prefer not to activate these specific cookies, Google provides a free opt-out add-on, which can be installed in the main browsers (see https://tools.google.com/dlpage/gaoptout). Not accepting these cookies may compromise some of the functions of the website.

Most browsers indicate, in their “help” section, how to decide whether to accept new cookies or not, how to have the browser warn you when you receive a new cookie and how to deactivate them altogether. Moreover, you can deactivate or eliminate similar data used by the browser’s add-ons, such as Flash cookies, by changing the settings of the add-on or visiting the website of its developer. If you set the browser to refuse cookies, the quality of the pages you visit may be reduced, and your browsing experience may be much less effective.

Processing methods

Personal data are processed using automated instruments (e.g. electronic procedures and media) and/or manually (e.g. hardcopy) for the period of time strictly necessary for fulfilling the purposes for which the data were collected. In any instance, they will be processed in compliance with the applicable standards in force.

Clouditalia complies with the standards in force to prevent the loss of data, illicit or improper use and unauthorised access.

Optional data provision

In addition to that specified for navigation data, users/visitors are free to provide their personal data. Failure to provide data may make it impossible to provide the requested service.
Legal obligations

The personal data indicated above can be processed to fulfil legal obligations for a set period of time. Personal data can be processed to ascertain responsibility in the event of computer crimes to the detriment of the website or of investigations by the Judicial Authorities. In such a case, the period for which these data are stored depends on the duration of the investigations.