

## I - INFORMATION RELATING TO THE PRIVACY POLICY OF THE SITE

1. This section contains information on the management methods of **Roma Transfert di Luca Tornesi** with reference to the processing of data of users of **Roma Transfert di Luca Tornesi (romatransfert.it)**.

2. This information is also valid for the purposes of Article 13 of Regulation (EU) no. 2016/679, relating to the protection of individuals with regard to the processing of personal data and the free circulation of such data, for those who interact with **Roma Transfert di Luca Tornesi** and can be reached at the address corresponding to the home page:

<https://romatransfert.it/en/home-english/>

3. The information is only valid for **Roma Transfert di Luca Tornesi** and not for other websites that may be consulted by the user through links contained therein.

4. The purpose of this document is to provide information on the methods, timing and nature of the information that the data controllers must provide to users when connecting to the web pages of **Roma Transfert di Luca Tornesi**, regardless of the purpose of the connection itself, according to the Italian and European legislation.

5. The information may undergo changes due to the introduction of new rules in this regard, the user is therefore invited to periodically check this page.

6. If the user is under the age of sixteen, pursuant to art. 8, c. 1 EU regulation 2016/679, will have to legitimize your consent through the authorization of the parents or guardian.

## II - DATA PROCESSING

### 1. Data owner

1. The data controller is the natural or legal person, public authority, service or other body which, individually or together with others, determines the purposes and means of processing personal data. It also deals with safety profiles.

2. With regard to this website, the data controller is **Luca Tornesi, Roma Transfert** and for any clarification or exercise of the user's rights, he or she can contact him at the following email address: [info@romatransfert.it](mailto:info@romatransfert.it)

## **2. Responsible for data processing**

1. The data processor is the natural or legal person, public authority, service or other body that processes personal data on behalf of the data controller.

2. Pursuant to Article 28 of EU Regulation no. 2016/679, upon the appointment of the data owner, the data processing manager of the **Roma Transfert di Luca Tornesi**'s site is: **Luca Tornesi, Roma Transfert**.

## **3. Place of data processing**

1. The processing of data generated by the use of **Roma Transfert di Luca Tornesi** takes place at **Via Pietro Davanzo, 81 00188 Rome (RM)**.

2. In case of need, the data connected to the newsletter service can be processed by the data controller or data subjects appointed for this purpose at the relevant office.

## **III – COOKIES**

### **1. Type of cookies**

1. The **Roma Transfert di Luca Tornesi**'s site uses cookies to make the user's browsing experience easier and more intuitive: cookies are small text strings used to store some information that may concern the user, his preferences or the device Internet access (computer, tablet or mobile phone) and are mainly used to adapt the operation of the site to the user's expectations, offering a more personalized browsing experience and memorizing the choices made previously.

2. A cookie consists of a reduced set of data transferred to the user's browser from a web server and can only be read by the server that made the transfer. It is not executable code and does not transmit viruses.

3. Cookies do not record any personal information and any identifiable data will not be stored. If you wish, you can prevent the saving of some or all cookies. However, in this case the use of the site and the services offered could be compromised. To proceed without changing the options relating to cookies, simply continue browsing.

Below are the types of cookies that the site uses:

## **2. Technical cookies**

1. There are numerous technologies used to store information on the user's computer, which are then collected by other sites. Among these the best known and used is HTML. They are used for navigation and to facilitate access and use of the site by the user. They are necessary for the transmission of communications on the electronic network or for the supplier to provide the service requested by the customer.

2. The settings to manage or disable COOKIES may vary depending on the internet browser used. In any case, the user can manage or request the general deactivation or deletion of cookies by changing the settings of their internet browser. This deactivation can slow down or prevent access to some parts of the site.

3. The use of technical cookies allows the safe and efficient use of the site.

4. The COOKIES that are inserted in the browser and retransmitted through Google Analytics or through the blogger statistics service or similar are technical only if used for the purpose of optimizing the site directly by the owner of the site, who can collect information in aggregate form so the number of users and how they visit the site. Under these conditions, the same rules apply to Analytics COOKIES, in terms of information and consent, provided for technical cookies.

5. From the point of view of duration, temporary session cookies can be distinguished which are automatically deleted at the end of the browsing session and are used to identify the user and therefore avoid logging in to each page visited and the permanent ones that remain active on the PC until expiration. or cancellation by the user.

6. Session cookies may be installed in order to allow access and stay in the reserved area of the portal as an authenticated user.

7. They are not stored permanently but only for the duration of the navigation until the browser is closed and disappear when the browser is closed. Their use is strictly limited to the transmission of session identifiers consisting of random numbers generated by the server necessary to allow safe and efficient exploration of the site.

### **3. Third party cookies**

1. In relation to the origin we distinguish the cookies sent to the browser directly from the site you are visiting and those of third parties sent to the computer from other sites and not from the one you are visiting.
2. Permanent cookies are often third party cookies.
3. Most third party cookies consist of tracking cookies used to identify online behavior, understand interests and then customize advertising proposals for users.
4. Third-party analytical cookies may be installed. They are sent from the domains of the aforementioned third parties external to the site.
5. Third-party analytical cookies are used to detect useful information about user behavior on **Roma Transfert di Luca Tornesi**. The survey takes place anonymously, in order to monitor performance and improve the usability of the site. Third-party profiling cookies are used to create profiles relating to users, in order to propose advertising messages in line with the choices expressed by the users themselves..
6. The use of these cookies is governed by the rules established by the third parties themselves. Therefore, users are invited to read the privacy policies and indications to manage or disable the cookies published on the relative web pages..

### **4. Profiling cookies**

1. Profiling cookies are those that create user profiles and are used in order to send advertising messages in line with the preferences expressed by the user in the context of surfing the net.
2. When using these types of COOKIES, the user must give explicit consent.
3. Article 22 of EU Regulation 2016/679 and Article 122 of the Data Protection Code will apply.

## **IV - DATA PROCESSED**

### **1. Data processing methods**

1. Like all websites, this site also makes use of log files in which information collected in an automated manner is stored during user visits. The information collected could be the following:

- Internet protocol (IP) address;
- Type of browser and parameters of the device used to connect to the site;
- Name of the internet service provider (ISP);
- Date and time of visit;
- Web page of origin of the visitor (referral) and exit;
- Possibly the number of clicks.

2. The aforementioned information is automated test rate and collected in an exclusively aggregated form in order to verify the correct functioning of the site and for security reasons. This information will be test rate based on the legitimate interests of the owner.

3. For security purposes (spam filters, firewalls, virus detection), the automatically recorded data may possibly also include personal data such as the IP address, which could be used, in accordance with applicable laws, to block attempts to damage to the site itself or to cause damage to other users or activities that are harmful or constituting a crime. These data are never used for the identification or profiling of the user, but only for the purpose of protecting the site and its users, such information will be used based on the legitimate interests of the owner.

4. If the site allows the insertion of comments, or in the case of specific services requested by the user, including the possibility of sending the Curriculum Vitae for a possible working relationship, the site automatically detects and records some identification data of the user, including the email address. These data are voluntarily provided by the user at the time of the request for service provision. By entering a comment or other information, the user expressly accepts the privacy policy and, in particular, agrees that the contents entered are freely disseminated to third parties. The data received will be used exclusively for the provision of the requested service and only for the time necessary for the provision of the service.

5. The information that users of the site will deem to make public through the services and tools made available to them, are provided by the user knowingly and voluntarily, exempting this site from any liability for any violations of the laws. It is up to the user to verify that they have permission to enter personal data of third parties or content protected by national and international standards.

## 2. Purpose of data processing

1. The data collected by the site during its operation are used for the purposes indicated above and for the following purposes:

- Data request to draw up a quote
- Data request to respond to a contact request
- Data request for any future marketing and / or advertising activities

2. Data retention will be carried out for the period strictly necessary to achieve the aforementioned purpose and in any case not exceeding **5 years**.

3. The data used for security purposes (blocking attempts to damage the site) are kept for the time strictly necessary to achieve the previously indicated purpose.

## 3. Data provided by the user

1. As indicated above, the optional, explicit and voluntary sending of e-mails to the addresses indicated on this site entails the subsequent acquisition of the sender's address, necessary to respond to requests, as well as any other personal data included in the message.

2. Specific summary information will be progressively reported or displayed on the pages of the site set up for particular services on request.

## 4. Support in configuring your browser

1. The user can also manage cookies through the settings of his browser. However, deleting the cookies from the browser could remove the preferences set for the site.

2. For further information and support, you can also visit the specific help page of the web browser you are using:

– Internet explorer

<http://windows.microsoft.com/en-us/windows-vista/block-or-allow-cookies>

– Firefox

<https://support.mozilla.org/en-us/kb/enable-and-disable-cookies-website-preferences>

– Safari

<http://www.apple.com/legal/privacy/it/>

– Chrome

<https://support.google.com/accounts/answer/61416?hl=it>

– Opera

[http://www.opera.com/help/tutorials/security/cookies /](http://www.opera.com/help/tutorials/security/cookies/)

## **5. Social Network Plugin**

1. This site also incorporates plugins and / or buttons for social networks, in order to allow easy sharing of content on your favorite social networks. These plugins are programmed so as not to set any cookies when accessing the page to safeguard user privacy. Eventually cookies are set, if so provided by social networks, only when the user makes effective and voluntary use of the plugin. Please note that if the user browses while logged into the social network then he has already consented to the use of cookies conveyed through this site at the time of registration to the social network.

2. The collection and use of the information obtained through the plugin are governed by the respective privacy policies of the social networks, to which please refer:

– Facebook

<https://www.facebook.com/help/cookies>

– Twitter

<https://support.twitter.com/articles/20170519-uso-dei-cookie-e-d-altre-tecnologie-simili-da-parte-di-twitter>

– Google +

<http://www.google.com/policies/technologies/cookies>

– Pinterest

<https://about.pinterest.com/it/privacy-policy>

– AddThis

<http://www.addthis.com/privacy/privacy-policy>

– LinkedIn

<https://www.linkedin.com/legal/cookie/policy>

## V - USER RIGHTS

1. Art. 13 co. 2 of the 2016/679 EU Regulation lists the user's rights.

2. This **Roma Transfert di Luca Tornesi** website therefore intends to inform the user about the existence of the user's rights, based on the following articles of Regulation (EU) 2016/679:

a) Based on art. 15, of the right of the interested party to ask the owner for access to personal data, based on art. 16 the possibility of rectifying the data provided, based on article 18, the possibility of integrating or limiting the processing that concerns him, or to oppose, for legitimate reasons, their treatment based on art. 21, in addition to the right to data portability based on art. 20 Regulation (EU);

b) the right to request cancellation based on Article 17, transformation into anonymous form or blocking of data processed in violation of the law, including those that do not need to be kept for the purposes for which the data were collected or subsequently processed.

c) the right to obtain the attestation that the updating, rectification, integration of data, cancellation, data blocking, transformation operations have been brought to the attention, also as regards their content, of those to whom the data have been communicated or widespread, except in the case in which this fulfillment proves impossible or involves the use of means manifestly disproportionate to the protected right.

3. Requests can be addressed to the data controller at his aforementioned email address (without formalities) or using the model provided by the Guarantor for the protection of personal data..

4. If the processing is based on art. 6 paragraph 1 letter a - express consent to use - or on art. 9 paragraph 2 letter a - express consent to the use of genetic, biometric, health-related data, revealing religious, philosophical or trade union beliefs, revealing racial or ethnic origin, political opinions - the user has the right to withdraw the consent



at any time without prejudice to the lawfulness of the processing based on the consent given before the revocation.

5. Likewise, in case of violation of the law, the user has the right to lodge a complaint with the Guarantor for the Protection of Personal Data, as the authority responsible for monitoring the processing in the Italian State.

6. For a more in-depth examination of the rights that compete with you, see articles 15-22 of Regulation (EU) 2016/679.

## **VI – FULFILLMENTS**

1. The owner notifies the Guarantor of the processing of personal data which he intends to proceed, only if the processing concerns:

- genetic, biometric data or data indicating the geographical location of persons or objects via an electronic communications network;
- data suitable for revealing the state of health and sexual life, processed for the purposes of assisted procreation, provision of health services by electronic means relating to databases or the supply of goods, epidemiological investigations, detection of mental, infectious and diffusive diseases, seropositivity, organ and tissue transplantation and monitoring of healthcare costs;
- data suitable for revealing sexual life or the psychic sphere, processed by associations, bodies and non-profit organizations, even if not recognized, of a political, philosophical, religious or trade union nature;
- data processed with the aid of electronic tools aimed at defining the profile or personality of the interested party or at analyzing consumption habits and choices or at monitoring the use of electronic communication services with the exclusion of technically indispensable treatments to provide the services themselves to users;
- sensitive data recorded in databases for the purpose of selecting personnel on behalf of third parties as well as sensitive data used for opinion polls, market research and other sample research;
- data recorded in specific databases managed with electronic tools and relating to the risk of economic solvency, the financial situation, the correct fulfillment of obligations, illegal or fraudulent behavior.

## **VI – SECURITY OF THE DATA PROVIDED**

1. This site processes user data in a lawful and correct manner, adopting appropriate security measures to prevent unauthorized access, disclosure, modification or unauthorized destruction of data. The processing is carried out using IT and / or telematic tools, with organizational methods and with logic strictly related to the purposes indicated.

2. In addition to the owner, in some cases, categories of employees involved in the organization of the site (administrative, marketing, commercial, legal, system administrators) or external subjects such as (as suppliers of third party technical services, postal couriers) may have access to the data. , hosting provider, IT companies, communication agencies).

## **VIII – CHANGES TO THIS DOCUMENT**

1. This document, published at the address:

<https://romatransfert.it/en/privacy-cookie-policy-en/>

2. It may be subject to changes or updates. Users are invited to periodically consult this page to keep up to date on the latest legislative news.

3. The previous versions of the document will be available, however, on this page .

4. The document was updated on **03/03/2021** to comply with the relevant regulatory provisions and in particular with EU Regulation 2016/679.