



Società con socio unico soggetta ad attività di direzione e coordinamento di Italgaphica S.r.l.

SEDE AMMINISTRATIVA E STABILIMENTO: Cap. Soc. Euro 12.000.000 i.v.  
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Via Ludovisi, 45  
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## Information note on privacy pursuant to articles 13 Leg. Decree 196/2003 (the “Privacy Code”) and art. 13 EU Reg. 2016/679 (the “GDPR”)

Dear Users, the data provided to “Italpack Cartons S.r.l. – sole shareholder” (the “Data Controller” or the “Company”) at the time of registration and, subsequently, for use of the services provided by the Data Controller, will be processed in observance of the provisions contained in Leg. Decree nr. 196/2003 on the matter of personal data protection (“Privacy Code”) and of article 13 as set out in the EU Regulation 2016/679 (“GDPR”).

Processing of personal data means any operation or set of operations carried out, also without the use of electronic tools, concerning the collection, registration, organisation, storage, consultation, processing, amendment, selection, extraction, comparison, use, interconnection, blocking, communication, diffusion, cancellation and destruction of data, also if not registered in a data bank.

In compliance with the contents of article 13 Leg. Decree no. 196/2003, and article 13 EU Regulation 2016/679, we would like to inform you that the personal data you provide will be processed by Italpack Cartons S.r.l. – sole shareholder, e-mail [privacy@italpack.com](mailto:privacy@italpack.com) (the “Data Controller” or the “Company”) in compliance with the current legal provisions in force, and in all cases, in observance of the principles of legality, correctness and transparency and observing the User’s confidentiality and rights.

**Nature of data processed and consequences of any refusal:** the Data Controller will mainly process the user’s personal data, such as personal details, email. Full details on each type of collected data are supplied in the dedicated sections of this privacy policy or via specific information texts viewed prior to collecting the data. If not otherwise specified, all the requested data are mandatory. Consequently, if the user refuses to provide said data, it may be impossible for the company to guarantee website operations [enter website address] or use of the relative services. In the cases it is stated that some data are optional, users are free to abstain from providing said data, without this having any consequence on the availability of the service or its functioning.

Any users with doubts about which data are mandatory should contact the Data Controller.

**Cookies.** Cookies are short strings of text that the websites visited by the user send to their terminal (usually to the browser), where they are stored in order to be retransmitted to the same websites at the same user’s next visit. While browsing a website, the user may also receive *cookies* on their terminal that are sent by different websites or web servers (so-called third parties), on which some elements (such as, for example, images, maps, sounds, specific links to pages of other websites) found on the website that the user is visiting may reside. Cookies, usually present in extremely high numbers in users’ browsers and sometimes extremely long-lasting, are used for different purposes: execution of information





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authentication, session monitoring, storage of information on specific configurations concerning users who access the server, etc.

Italpack Cartons S.r.l. – sole shareholder uses the following types of cookies on its website.

**Technical cookies.** These are the type used solely to transmit a communication on an electronic communication network, or to the extent strictly necessary, to the provider of the information company's service that has been expressly requested by the subscriber or by the user to provide this service. They are not used for other purposes and are normally installed directly by the data controller or by the website provider. They can be divided into browsing or session cookies, which guarantee normal browsing and use of the website (for example, allowing a purchase to be made or to log on to access reserved areas).

**Cookies analytics.** These are similar to technical cookies when they are used by the website provider to collect aggregate information about the number of users and about how they visit the website.

**Performance cookies** These allow the user to browse according to a number of criteria selected to improve the service provided to him/her.

**Profiling cookies** They are aimed at creating user-related profiles and are used to send advertising messages that are in line with preferences shown by the user while browsing the web, to obtain data about online behaviour of website visitors and to register the frequency of visits.

**Consent to use of cookies.** Consent to use of profiling cookies is given by the user in the following ways: by closing the banner containing the short information note, by scrolling down the page hosting the banner or by continuing browsing the website [indicate name of website] and may be revoked at any time. Not all technical cookies required consent therefore they are installed automatically after accessing the website or the service.

**Revoking consent to the use of cookies.** Cookies can be completely deactivated by the browser using the specific function provided in most browser programs. However, you should know that by deactivating cookies, some of the functions may no longer be usable. Below you will find the links to the information notes from the main browsers, providing more information about deactivation of cookies: [Chrome](#), [Firefox](#), [Internet Explorer](#), [Safari](#). In reference to profiling cookies aimed at offering you customised publicity, we would like to inform you that should you revoke consent, you will in any case continue to receive general publicity.

**Third party cookies** We use Google Analytics for aggregate and anonymous tracking, for the purpose of visit analysis to improve content and user experience.

For more details and to disable saving, please visit the website

[http://www.google.com/intl/it\\_it/analytics/learn/privacy.html](http://www.google.com/intl/it_it/analytics/learn/privacy.html)





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<http://www.google.it/intl/it/analytics/privacyoverview.html>

To disable the collection of data by Google Analytics:

<https://tools.google.com/dlpage/gaoptout>

**Purpose of processing:** the user allows the data provided to be used: 1) for the correct and regular execution of the relationship established with the Data Controller, 2) to allow the Data Controller to provide its services; 3) for statistical purposes; 4) further to the user's specific and explicit consent, for marketing purposes (sending of advertising material, conducting market research or commercial communications); 6) further to the user's specific and explicit consent for profiling purposes, in particular for analysing his/her preferences.

Consent for processing as specified above in nos. 5) and 6) is optional and non-acceptance will not cause any consequence in relation to the services provided on the website [www.italpackcartons.com](http://www.italpackcartons.com)

To obtain further detailed information about the purposes of processing and about personal data that is actually relevant for each purpose, the user can refer to the relative sections of this document.

**Legal basis of processing and obligation:** the legal basis of processing by the Data Controller is represented: 1) by your consent for one or more of the specific purposes; 2) by the execution of a [contract] with the user and/or the execution of pre contractual measures; 3) fulfilment of a legal obligation that the Data Controller is subject to; 4) by the existence of a public interest or for exercising public powers that the Data Controller is bestowed with.

It is however possible to ask the Data Controller to clarify the actual legal basis of each processing event and in particular to specify if the processing is based on the law, provided for by contract or required to stipulate a contract.

**Processing method:** processing is carried out by computer and/or remote and/or paper instruments using logical and organisational methods that are closely related to the purposes stated, which guarantee their security.

**Information storage:** The user's data will be processed and stored for the time required for the purposes for which they were collected. When processing is based on the user's consent, the Data Controller can store the personal data for a longer period, until said consent is revoked. Also, the Data Controller may be obliged to store the personal data for a longer period in observance of a legal obligation or by order from an authority. At the end of the storage period,





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the personal data will be deleted. Therefore, when said period expires, the right to access, cancel, rectify data and the right to portability of data may no longer be exercised.

**Data subject's rights:** The user may exercise the following rights with the Data Controller: 1) obtain confirmation of the existence of his/her personal data; 2) access the data within the terms as set out in article 15 GDPR, convert the data to anonymous format or block the data that no longer requires storage in relation to the purposes for which the data were collected and processed; 3) have own personal data updated, rectified and/or added to 4) cancellation (of own personal data if the conditions as set out in the GDPR exist; 5) limitation of processing if the conditions as set out in the GDPR exist; 6) receive the personal data pertaining to him/her in a structured, commonly used and legible format from an automatic device and obtain transmission to another data controller (right to portability of data(, if processing is based on consent or is carried out using automatic means; 7) lodge a complaint with a supervisory authority for any processing considered to be illegal or not-compliant with the GDPR; 8) revoke consent, if said consent is the legal basis for processing, without prejudicing the legality of processing based on consent prior to exercising the right to revoke consent; 9) obtain human processing in automatic processing procedures, notwithstanding the limitations as set out in art. 22, para. 2, GDPR. The user has the right to oppose processing of personal data at any time – for reasons connected with a particular situation – based on the exercising of a duty of public interest, connected with exercising public powers and/or based on the Data Controller's legitimate interest and has the right to oppose handling of personal data at any moment for purposes of direct marketing, except where processing is necessary to carry out a duty of public interest.

**Communication and dissemination of data:** The user's personal data may be "communicated" (by this term we mean to allow one or more given subjects to learn of said data) a: i) subjects appointed/authorised and/or delegated within the Data Controller's organisation to process data ii) to subjects who can access data due to legal, or EU legislative provision, within the limits foreseen by law; iii) subjects who need to access data for purposes ancillary to the existing relationship (e.g. Legal department, administration department and if present); iv) data processors that the Data Controller has appointed, pursuant to and in accordance with article 28 of EU Reg. 2016/679 and who are called upon to process personal data within the limits required to carry out their duties with the Data Controller. The updated list of processors can always be requested from the Data Controller.

**TRANSFERRING DATA OVERSEAS:** The personal data collected will not be transferred to other countries outside the European Union and to international organisations.

**DATA CONTROLLER AND DATA PROCESSOR:** to exercise any right pertaining to your personal data, and for any clarification regarding the type of data processed, data storage, terms and duration of processing, please contact the Data Controller Italpack Cartons S.r.l. – sole shareholder, with offices in Rome, Via Ludovisi no. 45, email privacy: [privacy@italpack.com](mailto:privacy@italpack.com)





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**AMENDMENTS AND UPDATES TO THE INFORMATION NOTE:** The Data Controller reserves the right to amend or simply update all or part of the text of the herein information note, in particular where the amendment is caused by a legal or regulatory provision regarding personal data protection. Amendments and updates to the information note will be made available and communicated in the forms usually used for communications during the contractual period.

#### DATA PROTECTION OFFICER (RPD)

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