

COOKIES POLICY ARCONVERT S.P.A.

The rules on the use of "cookies" and other similar tools in terminals (personal computers, notebooks, PC tablets, smartphones, etc.) by users have been amended after the implementation of Directive [2009/136/EC](#) amending the "e-Privacy" Directive 2002/58/EC. The implementation of the new Directive took place in Italy by virtue of the Legislative Decree Number 69 of 28 May 2012, which amended the Legislative Decree number 196 of 30 June 2003 on the "Code for Personal Data Protection" and European Regulation 2016/679. In particular, the Data Protection Authority (*Garante*) intervened with a specific general measure dated 8 May 2014 ("Identification of the simplified procedures for disclosing information and obtaining the consent for use of cookies"). In particular, such procedures explained the following:

a. Technical cookies.

Technical cookies are those used solely to transfer communication over an electronic communications network or to the extent strictly necessary for an information society service provider specifically requested by a subscriber or user to provide such service. They are not used for any other purposes and are normally directly installed by the controller or operator of the website. They can be subdivided into browsing or session cookies, which ensure normal browsing and use of the website (allowing, for example, purchases to be made or authentication to access restricted areas). Cookie analytics, similar to technical cookies when directly used by the site operator to collect information, in an aggregate manner, about the number of users and how they visit the site and functionality cookies, which allow users to browse according to a series of selected criteria (for example, language, products selected for purchase) in order to improve the service provided.

Installing such cookies does not require the user's prior consent, whereas there is still an obligation to provide information pursuant to Article 13 of the EU Regulation, which the site operator, if such devices are used, may provide in the manner deemed most suitable.

b. Profiling and third party cookies

Profiling cookies are used to create user profiles and to send advertising messages according to the preferences stated by the user when browsing the web. Due to the particular intrusion that such devices could imply within the scope of users' privacy, European and Italian regulations require that users must be sufficiently informed about the use thereof and must grant their valid consent.

The regulations refer to this by stating that the storage of information in terminal equipment of a contracting party or user or access to information already stored is only allowed providing both the contracting party and the user have granted their consent after being duly informed in the simplest manner possible.

We would like to provide information below to the visitors to our website, www.arconvert.it, on how these cookies are used.

What cookies are

Cookies are files that can be stored on users' computers (or other internet browsing-enabled devices, for example smartphones or tablets) when visiting a website. A cookie usually contains the name of the website from where the cookie originates and the so-called "lifetime" of the cookie (i.e. how long it will remain in the user's device).

Cookies that are essential for the website to function

The website, www.arconvert.it, only uses technical and non-persistent session cookies in order to offer a more efficient service to users. The use of such cookies is strictly limited to the transfer of session identifiers (consisting of random numbers generated by the server) that are required to enable the functions and services of the website to be fully provided. The cookies used on the website avoid the use of other IT techniques that could potentially compromise the confidentiality of users' browsing and do not allow data to be directly obtained that identify the user.

Users may always disable the cookies by changing the browser settings, but this may slow down or prevent access to certain parts of the site.

In fact, cookies are necessary to use the site and for providing its services, including the purchase of possible products. If they are deactivated, Arconvert S.p.A. cannot guarantee the memorisation and display of the products selected during the online purchasing processes nor that one or more items will be added to the shopping cart.

Changing the browser settings

The browser settings can usually be easily changed by taking the following steps:

- Select the internet options or preferences from the Tools Menu or View or Edit;
- Select Privacy or Security or Download Files and choose the preferred settings.

Further instructions can also be found at the website address of the browser selected by the user.



Cookies used for aggregate analysis of website visits

In its position as data controller, Arconvert S.p.A. uses tools for aggregate analysis of the browsing data that allow its website to be improved, (Google Analytics). In particular, Google Analytics, a system provided by Google Inc., uses temporary cookies that are stored on the user's computer to allow the website operator to analyse the actions of users on this website. These cookies are used to memorise information, for example the time of users' current visits, possible previous visits to the website by these visitors and the website that provided information about the web page to the visitors; Google does not use this information to send targeted advertising. In any case, browsers do not share proprietary cookies between different domains.

For further information: http://www.google.com/intl/it_it/policies/technologies/ads/. Users can partially or fully deactivate Google's use of cookies by visiting the following page: <https://www.google.it/ads/preferences> e <https://www.google.it/settings/ads/onweb>.

Google Adwords cookies

The website www.arconvert.it uses Google Adwords profiling cookies. Further details on their function and use can be found below. The information generated by the cookies about the use of the website by users (including their IP address) is transmitted and filed by Google servers in the United States. Google uses this information for the purpose of tracking and evaluating the use of the website and to draw up reports on browsing activity for website operators. Google may also transfer this information to third parties when legally required to do so or when such third parties process the aforementioned information on behalf of Google. Google will not associate users' IP address with any other data it stores. Users can refuse the use of cookies by selecting the suitable settings on their browsers. By using this website, the user consents to the data being processed by Google by the aforementioned method and purposes.

This website also uses the remarketing function of Google Adwords. This function allows publication in the network of Google contents. For further information visit the following page: <https://support.google.com/adwordspolicy/answer/143465?hl=it&rd=1>). Some pages of the site therefore also include a code called the "remarketing code" that allows users to read and configure browser cookies in order to determine the kind of ad that will be displayed to users depending on the data related to their visit to the site. The remarketing lists created are stored on Google's servers where all cookie IDs with users' interests are filed. The information obtained only enables the browser to be identified but under no circumstances can the user be identified (further information about the remarketing tool is always available on the following page:

<https://support.google.com/adwordspolicy/answer/143465?hl=it&rd=1>).

Users can view the other policies related to Google Adwords cookies at the following address:

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

Interaction with social networks and external platforms

This kind of service allows users to directly interact with social networks or other external platforms from the pages of this website. The interaction and information obtained from this website are, in all cases, subject to the user's privacy settings related to each social network.

If a service is installed that interacts with social networks, even if users do not use the service, it could collect traffic data related to the page where it is installed. The social networks identified are: Facebook, Twitter, Instagram, Linked in, Spotify, YouTube, Flickr.

Data Controller

The data controller is Arconvert S.p.A., with headquarters at Via Linfano 12, Arco (TN). For any communication related to the data processing using the cookies by Arconvert S.p.A., the data subject can contact the Privacy Service at the same address. In order to find out about any changes or modifications in the main privacy policies privacy and the regulations, users should regularly consult this document.

Rights of the data subjects

Arconvert S.p.A. hereby states that Article 15 of Regulation (EU) 2016/679 grants specific rights to data subjects who provide their personal data. In particular, users can obtain confirmation from the controller of whether or not their personal data exist or the possible processor and that such data are made available to them in an understandable form. The data subject may also request information about the source of the data and the reason and purposes on which the processing is based, obtain cancellation, conversion into anonymous form or blocking of the data processed when the law is infringed as well as updating, rectification or, if interested, integration of data, opposition, for legitimate reasons, to processing the data. We also remind users that they can exercise their rights according to Articles 16, 17, 18 and 20 of Regulation (EU) 2016/679.



Regarding the personal data processing referred to above, the data subject is entitled to the following, pursuant to Article 15 of the EU Regulation:

1. The data subjects are entitled to obtain confirmation from the data controller of whether or not their personal data are being processed and, if so, to obtain access to the personal data and the following information:
 - a) The purpose of the processing;
 - b) The categories of personal data concerned;
 - c) The recipients or categories of recipients to which the personal data have been or will be disclosed, in particular if they are recipients in third countries or international organisations;
 - d) Whenever possible, the planned storage period of the personal data or, if that is impossible, the criteria applied to determine such period;
 - e) The existence of the data subjects' right to require that the data controller rectifies or cancels the personal data or limits the processing of their personal data or oppose their being processed;
 - f) The right to file a claim to the supervisory authorities;
 - g) If the data are not directly collected from the data subject, all the information about their source;
 - h) The existence of an automatic decision-making process, including profiling, according to Article 22, paragraphs 1 and 4, and, at least in such cases, significant information about the reason as well as the expected importance and consequences of such processing for the data subject.
2. If personal data are transferred to a third country or an international organisation, the data subject is entitled to be informed that there are sufficient safeguards for the transfer, according to Article 46.
3. The data controller must provide a copy of the personal data being processed. If additional copies are requested by the data subject, the data controller may charge a reasonable fee to cover its administrative costs. If the data subject submits a request by electronic means, unless the data subject specifies otherwise, the information will be provided in a commonly used electronic format.
4. The right to obtain a copy, according to section 3 above, must not violate others' rights and freedoms.