

Website privacy and cookie policy for <http://www.vipaspa.it/> in accordance with art. 13 of EU Regulation n. 2016/679

With the current privacy notice, the Data Controller provides you the information regarding methods and purposes of personal data processing of users that interact with the website www.vipaspa.it. This privacy notice inform you on the rights you can assert as established by EU Regulation n. 2016/679 and it could be subject to changes and updates, as well as complemented by special privacy notices if any other service requested by the user implied different processing of personal data.

1)- Definitions

For the purposes of this privacy notice and without prejudice to the definitions in art. 4 of EU Regulation n. 2016/679, the following terms are drawn up:

- a) domain:** the domain available at <https://www.vipaspa.it/>
- b) collection points:** areas located within the domain www.vipaspa.it and aimed at collecting personal data (e.g. Request Information form, Vipa Shop page).

2)- Data Controller

2.a – The Data Controller is VIPA S.p.A. (P.I. e C.F.: 00007080369) with registered office in Carpi (MO), Via Abetone n. 20, and head office in Rolo (RE), Via Cantonazzo n. 20/22 (email: info@vipaspa.it – pec: pec@pec.vipaspa.it).

3)- Type of personal data collected

3.a – With regard to the personal data collected, we inform you their collection and processing concern personal information below, prior data subject's consent when necessary:

I- Identification and common personal data: in order to manage the relationship with the user and/or the related services, personal data are collected including, but not limited to, user identification data such as name, surname, location, e-mail address e all necessary information for providing properly the services requested.

II- Special categories of personal data: this website currently does not collect and process special categories of personal data. If their collection and processing should prove necessary, you will be informed in advance and required to give your consent, according to art. 9 of EU Regulation n. 2016/679.

III- Personal data relating to minors: the provision of personal data through the collection points on the website www.vipaspa.it is reserved to adults only, unless otherwise indicated.

IV- Data acquired during navigation: the website's operation involves the use of computer system and software procedures, which collect information about the website's users as part of their routine operation, whose transmission is automatic when using internet communication protocols. Although the Data Controller does

not collect this information to associate it to specific users, it is still possible that, by its nature and through processing and association with further data held by third parties, such information may permit to identify users. These data includes your IP address, the domain names of your computer, the URI (Uniform Resource Identifier) addresses of resources you request on this website, the time of requests made, the method used to submit requests to the server, the dimension of the file obtained in response to a request, the numerical code indicating the status of the response sent by the server (successful, error, etc.) and other parameters related to the user's operating system and IT environment. The Data Controller shall only use such data for anonymous, statistical purposes about the use of the website and to ensure its correct operation. This data may also be used for the purposes of investigating liabilities in the event of information crimes.

V- Cookies: cookies are small text files that are stored in your device (PC, tablet, smartphone) when visiting our website and allow it to recognise the browser on future visits. The Data Controller use cookies mainly to give you the best experience on our website, storing information the system can use later again, such as the information which are requested to log in to the reserved area. Our system uses time-limited session cookies, which are automatically erased when you close your browser and persistent cookies, which remain on your device until they expire or are erased by the user himself.

Which cookies does this website use?

This website uses the following cookies:

1. Technical and session cookies: they are temporary and give the user access to personalized features; these cookies enable us to enhance our browsing experience on this website.
2. Analytical cookies: both temporary and permanent, they are used for aggregate collection of information about the behaviour of users on the website and thus improve the experience and content provided. The data collected are converted into anonymous form and are processed exclusively for statistical purposes. We specifically make use of cookies by Google Analytics* in the way described in this privacy notice.
3. Social cookies: are provided directly from the social media domains we host through links to official pages, share buttons and links. The use of these buttons and functionalities involves the exchange of information with such websites, so the management of information and how to delete it is regulated by third parties: please see the respective privacy policies of each of the websites in question.
 - Facebook
 - Twitter
 - Google Plus / You Tube
 - Sharethis
4. Advertising cookies: our website uses Google Adwords solely to promote our services on internet. Our website does not use remarketing lists and display

network ads. To receive information about which cookies are used please read this page.

The use of such cookies is of a purely anonymous nature, personal information is not collected unless the user intends to provide it explicitly by sending contact forms or requests for information.

*Our website uses Google Analytics' special advertising features to enable functionalities that are not available through standard implementations. These functionalities allow us to collect traffic data through Google's advertising cookies and anonymous identifiers in addition to the data collected through a standard implementation of Google Analytics.

Please note this website does not collect any strictly personal information through Google Analytics's features, but it allows us to gather, in aggregated form, data on user's age, gender, preferences and interests in order to better understand the use of this website and target the services provided.

The advertising features we have implemented are the following:

- Google Analytics reports on demographic data and interest.

It is your right to accept or refuse cookies

When visiting our website, you implicitly agree to the use of these cookies. By default, browsers generally activate the use of cookies both coming from our site and from third-party websites. In any case it is possible to change these settings and choose between unconditional acceptance, prior displaying a pop-up window which requires an explicit action by the user or the refusal of cookie without exception.

To manage the use of cookies, you need to change your browser settings using the relative toolbar.

Below we provide links to resources which describe the cookie management procedures for the most popular browsers:

- Internet Explorer: [cookiesmanagement](#)
- Mozilla Firefox: [delete cookies block cookies from websites](#)
- Google Chrome: [cookies management](#)
- Opera: [managing cookies](#)
- Safari: [managing cookies](#)

It is possible to disable Google Analytics' cookies by visiting Google website page (Google GaOptOut) and downloading the add-on for the browser you use.

Please note you must set cookie preferences for each device and browser use when browsing the internet.

To enable this website to properly work, get the most out of its functionalities and use all of it, we suggest you accept the use of cookies from the website and third parties.

3.b - Any optional, explicit and voluntary e-mail sent to the addresses indicated on this website automatically enables the attainment of the senders address and other data included in the message which are necessary to provide the solutions requested.

4)- Purposes of personal data processing

4.a – Personal data you provide us are collected and processed for the following purposes:

- i) To access to the reserved area of the website, give the user access to dedicated contents and place online orders;
- ii) To comply with the requests made by the data subject via e-mail or forwarded through the contact form and/or the “Work with us” form;
- iii) To send newsletters and dedicated offers, prior explicit consent of the data subject;
- iv) To give general information regarding other goods and services offered, similar to those already purchased or accessed and pursuant to art. 130, c. 4, of Italian Privacy Code;
- v) To obtain statistical information on the use of services (most visited pages, number of visitors per time-slot or day, geographical areas of origin, etc.) to improve the user experience and monitor the use of this website.

5)- Methods of personal data processing

5.a – The personal data processing is performed by means of operations indicated in art. 4 of the Italian law D. Lgs 196/2003 and art. 4 of the EU Regulation n. 2016/679. The following activities are identified as processing of personal data: registration, organization, conservation, consultation, processing, modification, selection, extraction, comparison, use, interconnection, block, communication, dissemination, erasure, destruction.

5.b – Personal data collected are processed by manual elaboration, telematic and computing form.

5.c – The Data Controller shall process personal data only as long as is strictly necessary and shall use the information collected exclusively for the purposes mentioned above and at the latest 10 years after the termination of the relationship for the purposes set out in point 4.a, notwithstanding different time limit as established for the compliance with law and tax obligations.

5.d – Your personal data will be stored within the European Union and the related security policies are reviewed according to the best practices in relation to data protection.

5.e – No profiling activities or other automated decision-making processes are used on this website.

6)- Nature of data provision

6.a – The provision of personal data is generally not mandatory; anyway, sometimes it can be necessary to enable the user to receive the services requested and fully benefit from the functions the website provides.

6.b – The provision of personal data is necessary for the purposes under point 4, n. i) and ii). No consent is required for the processing of data for the purposes described above and, therefore, for the performance of an agreement to which you are a party or the implementation of measures requested prior to entering into an agreement. It is not mandatory for the user to give the Data Controller its personal data for these purposes; however, if you do not provide us your personal data, the Data Controller will not be able to provide any services to you.

7)- Legal basis of the processing

7.a – Under existing EU Regulation, personal data are processed in accordance with the following legal basis:

- i)** The fulfilment of any pre-contractual, contractual, tax and legal obligations arising from the relationship with the data subject, with regard the purposes in paragraph 4.a., points i) and ii);
- ii)** The consent granted specifically, correctly, in an informed and unambiguous with regard the purposes in paragraph 4.a., points iii);
- iii)** The legitimate interest of the Data Controller with regard the purposes in paragraph 4.a., points iv) and v).

8)- Recipients or categories of recipients

8.a – The personal data may be disclosed and processed only by the following subjects:

- i) Employees and collaborators of the Data Controller, as designated and authorized by the Data Controller, on the basis of their skills, assigned tasks and given instructions;
- ii) External data processors specifically appointed such as their authorized employees and collaborators, on the basis of their skills, assigned tasks and given instructions.

8.b – With regard to ordinary management, accounting and administrative activities, the Data Controller can communicate your data to the following recipients, prior collection of your consent if required by law and only for performing the services required by the data subject:

- i) Postal service companies;
- ii) Lawyer and notary companies;
- iii) Consultants and other service companies;
- iv) Authorities responsible for enforcement of compliance with the law and/or provisions of public bodies, upon request

8.c – The processed data will not be disclosed to third parties.

9)- Data transfer to third countries

9.a – The Data Controller does not transfer personal data to third countries. However, it can happen servers of third parties, as service providers, are physically

located in foreign countries. In that case, the data transfer to third countries will take place in compliance with the EU Regulation n. 2016/679, art. 44 et sq.

10)- Rights of the data subject

10.a – In accordance to art. 15 et sq, EU Regulation n. 2016/679, you have the right, at any time, to obtain from the Data Controller access to your personal data, receive a copy of the personal data processed, modify them and erase them, limit the processing and oppose data processing based on legitimate interest;

10.b – You have also the right to withdraw your consent: if the processing is based on consent, data subjects have the right to withdraw it at any time without prejudice to the lawfulness of the processing based on the consent given prior to its withdrawal. You can exercise the right to lodge a complaint with the supervisory authority “Garante per la protezione dei dati personali” (<https://www.garanteprivacy.it/web/guest>).

10.c – To object to data processing and to exercise other rights, you can write to the Controller to the address: info@vipaspa.it or to the addresses given in point 2 of this privacy notice. To handle the request, the Data Controller reserves the right to ask the exhibition of a valid identity card.

The Data Controller reserves the right to partly or fully amend this privacy policy, or simply to update its content, e.g., because of changes in applicable law. The Data Controller therefore invites you to regularly visit this page in order to acquaint yourself with the latest, updated version of the privacy notice, so that you may remain constantly informed on how the Data Controller collects and uses personal data.