



Micerium S.p.A.

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**Privacy Policy**  
**Web Site Information**  
**Micerium.it and Micerium.com**

**This Information**

- describes the procedures for administering the sites in reference to the processing of personal data;
- is provided according to Art. 13, of the Legislative Decree no. 196/2003 (Italian Personal Data Protection Code), to those who interact with our web services;
- is also based on Recommendation 2/2001 for the protection of personal data contained in Directive No. 95/46 identifying the minimum requirements for collecting personal information online and, in particular, the manner, timing and nature of the information that the holders of treatment should provide to the users of the website.

This Information relates only to the sites **Micerium.it** and **Micerium.com** and not for other sites which may be accessed via links.

**OWNER OF AGREEMENT**

The owner of agreement is **MICERIUM S.p.a.**, in the person of its President **Ms Maria Picarelli**

**1. RESPONSIBLE FOR AGREEMENT**

The complete list of all those responsible for the processing of personal data, which we appointed, is readily available by contacting the owner of the agreement for the access to the data indicated in paragraph 13 of this document.

**2. PLACE OF DATA PROCESSING**

The agreements related to the services on this web site are at the headquarters of the owner and are only handled by technical staff responsible for this purpose; any involved with the processing have committed in writing to privacy.

**3. RULES OF DATA COLLECTION**

The collection of information through the site can be made:

- by an **explicit** request, when you use the site and may include name, address, telephone number, email address and so on. This information is requested **when you order a product, ask information on a service, take part in promotional activities, fill in questionnaires, want to subscribe to one of the forums, etc.**  
**Whenever you visit a site that requires the acquisition of personal information, a request in this regard will appear and you are invited to express your consent.**



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- Variations on password type, subscription/cancellation for receiving News, Mailing List and similar services (eg Dr. Corse de Mic) can be made directly on-line.
- By acquiring, during their normal exercise, some personal data whose transmission is **implicit** in the use of Internet communication protocols.

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

### **Cookie**

A “cookie” is a small data file transferred to your PC's hard drive when you access a website.

### **No personal user data is acquired from the site.**

The collected information is anonymous and only allows analysis of the type of traffic on the site. You can refuse cookies altogether or selectively accept only some, depending on your browser preferences.

**If you inhibit the loading of cookies, some components of the site may be unavailable and some pages may be incomplete.**

### **Data Log**

Logs are files where data or activities performed by users who connect to our networking site are automatically recorded. This information, as well as being necessary for administrative purposes (in case of pay services, for example, for billing) is retained for a maximum period of **30 months** (as provided by the Art. 132 of the Code) for the purposes of detection and suppression of crime.

### **Using advertising dealerships and research firm.**

On the site you can find advertisements for other companies. The cookies placed by these companies can not collect information for identifying personal users, are anonymous and collected only for purposes of marketing analysis about the site.

Micerium S.p.A. is not allowed to access and does not control cookies distributed by ad networks to third parties.

### **Information voluntarily submitted by the user**

The voluntary submission of e-mail to the addresses listed on this site, also using the services made available, involves the vision of the sender and any other personal data included in the message. This information will be used solely for the purpose of providing the requested service. If for any reason, the data were used for other purposes, they will be subject to the required compliance depending on the use of them in accordance with existing regulations (information and, if necessary, request for consent), otherwise will be immediately and irrevocably removed from our information systems.



#### 4. LINKS TO OTHER SITES

The site contains links to third party sites. When you use these links you forward in areas not controlled by our organization, therefore we are not responsible for the content that you might encounter or the procedures relating to privacy therein adopted.

This information does not include the privacy procedures taken by the related sites. It is advisable to examine carefully the procedures of each site is visited. Other sites, so as to be independent, they can send their cookies to users, collect data or solicit personal information

#### 5. TYPE OF TREATED DATA

The collected data, in addition to those listed above and necessary for the provision of the requested services and for related tasks (e.g. billing, user identification, etc.) cover the following categories of data:

- fiscal and economic data, that are necessary for the provision of services covered by contractual actual or future relationships;
- traffic data necessary for its eventual billing services, where specifically requested;
- data concerning the location of equipment, other than those necessary for the delivery of services. These data indicate the geographical location of the terminal equipment of an electronic communications service accessible to the public;
- data related to e-mail addresses;
- traffic data that are not strictly necessary for the provision of services (log files, tracking operations).

Micerium S.p.A. does not acquire any data classified as sensitive (Article 4 comma d - Leg.Dec. 196/03) or judicial nature (Article 4 comma e - Leg.Dec. 196/03). If there are such data voluntarily provided by application of the service, unless they are accompanied by consent to treatment, they will be eliminated.

#### 6. AIMS OF AGREEMENT

Data is collected for purposes of the processing. According to those purposes in some cases it is necessary to obtain the prior consent to allow the collection and further agreement. In case of need it will be explicitly requested so that you can give to all or only for certain treatments.

##### 6.1 Purpose which is not required to consent

###### Navigation Data

These data are used only to obtain anonymous statistics on the use of the site and to check the proper functioning.



**Personal data provided voluntarily by users as a result of requests for service**

These data will be used for the sole purpose and only for as long as necessary to perform the required services and they will be disclosed to third parties only if this is necessary for that purpose, such as **employees of the office, couriers for the shipment of goods and so.**

**Processing of information relating to traffic**

They do not allow individual identification and they are used on an aggregate basis and never personalized, to analyze user behaviour in order to understand how visitors use the site and to measure the interest found in different pages. This allows for better content, simplify the consultation and tailor advertisements.

**Collection of traffic data**

They refer to information needed for billing purposes to the subscriber, or payment in case of interconnection. Currently no data on the traffic is running on this site.

## **6.2 Purpose for which the consent is needed**

**Collection of traffic data for purposes of marketing communications services**

The data will be processed for the time and to the extent necessary to deliver the service required.

**Collection of data stored in the terminal of a subscriber or a user for a legitimate purpose**

These data are necessary for storing technique used for the time strictly necessary for the transmission of communication or for providing a specific service requested by the user (cookies).

The processing is needed for:

- Managing of electronic commerce to make the navigation of the user increasingly easier, faster, more efficient and personalized in the various activities being carried out on the site as orders (eg "shopping cart"), join to mailing lists, technical assistance, etc ...;
- Management of navigation on Internet through:
  - restricted  access, asking users to register with a combination of username and password in order to be admitted to navigating the site (*by sending a cookie containing a code indicating which pages the visitor is allowed to see, which will be recognized at all next visit, the browser will avoid the burden of insert username and password each time you access to a new page*);
  - intelligent modules: web  pages that require users to fill out the forms every time you log on (*using a cookie, which stores data in user's hard disk, your browser will send the cookie to the Web server to each visit, not always require the same information*);
  - all data related to traffic, except for those needed for billing purposes or, if requested by and/or user, necessary for the marketing of electronic communications services or for the



provision of added value services, will be erased or made anonymous when no longer needed for transmission of electronic communication (in practice at the end of the call).

## 7. RULES OF PROCESSING

The data processing is automated through the use of tools and procedures that guarantee the security and privacy, even during the use of technologically more advanced as Internet. Treatment may include all operations or set of the collection, recording, organization, storage, consulting, development, modification, selection, extraction, comparison, use, interconnection, blocking, erasure, destruction of data as Art. 4, paragraph 1, letter. a, and required for the processing in question, including communication and dissemination against persons as specified in the relevant section of this document.

These data also will be:

- a) processed lawfully and correctly;
- b) Information about the specific, explicit and legitimate, and used in other processing operations on terms which are not incompatible with those purposes;
- c) accurate and updated if necessary;
- d) relevant, complete and not excessive in relation to the purposes for which they were collected or subsequently processed;
- e) preserved in a form that can be identified by the party for a period of time that is necessary for the purposes for which they were collected or subsequently processed;

in compliance to Art .11 Leg. Dec. 196/03.

Specific security measures are observed to prevent data loss, misuse or incorrect and unauthorized access.

## 8. SECURITY OF PERSONAL DATA

Personal data, possibly collected on the site, are protected from access, use or disclosure by not authorized people. These data can be accessed only by our personnel who are equipped with their own authentication credentials, and to they has been applied all the security procedures necessary to protect them from abuses from unauthorized personnel, both locally and in the network. All personal information provided to us are, in fact, stored in a safe and controlled environment. To this end were prepared physical, electronic and organizational processes to safeguard and protect the gathered information, including use of **firewalls and antivirus**.

## 9. GUARANTEES FOR USERS AND STORAGE OF DATA ON THE TRAFFIC

Particular attention is devoted to security services taking care to safeguard:

- the integrity of  traffic data;
- the integrity of electronic communications.

Such guarantees are provided, in addition to the above-mentioned procedures, by electronic means and at constant and continuous monitoring system



Furthermore, if there are risk situations, all customers registered with the site and, where possible, users will be informed about the existence of particular risk of violation of network security. This information will be sent to the Supervisor as required by Article 32 comma 3.

#### **10. GUARANTEES FOR USERS AND STORAGE OF DATA ON THE TRAFFIC**

In accordance with Articles 124 and 132 of the Code traffic data are stored as follows:

#### **11. SHARING OF INFORMATION**

The personal data in the network are not shared, rented or sold to third parties. If it would be necessary, the consent will be required. Personal data can be communicated and / or distributed as specified under "Communication and distribution".

#### **12. RIGHT OR OBLIGATION TO GIVE DATA**

Apart from that data specified for navigation, the user is free to provide personal information that can be applied for browsing on our site. Their failure, it may be impossible to fulfil the request

#### **13. COMMUNICATION AND DISTRIBUTION**

No data from the web service is communicated or disseminated. It may, however, confirm the need to rely on outsiders to fulfil what you asked for (e.g. other consultants, couriers, etc.), In which case such data can be communicated to these subjects in order to accomplish at the your request.

Moreover, these data can be viewed by internal responsible leaders of the treatment.

#### **14. YOUR RIGHTS**

Those, whose personal data are referred, have the right at any time to obtain confirmation of the existence of the data and to know its content and origin, verify its accuracy or request its integration, updating or correction according to the Art. 7, Leg. Dec. 196/03. Under this article, one has the right to request cancellation, transformation in anonymous form or block of data used in violation of the law, and to oppose:

- for legitimate reasons to the processing of personal data, even if pertinent to the purpose of the collection;
- in each case to the processing of personal data for the purpose of direct marketing.