

Dear user,

With this policy the data controller, as defined below, wishes to explain to you how to manage the website, indicating the purposes for which it collects and process Your personal data, the categories of personal data that are the subject of processing and also Your Rights. The information is made available only for this website and not for other Web pages that may be consulted by the user through links.

The data controller of Your personal data is **OROLOGERIA DUOMO MILANO S.R.L.**, responsible for the legitimate and correct use of Your personal data and that you may contact for any information or request at the following addresses:

Contacts and addresses:

PEC	orologeriaduomo@pec.it
E-mail	info@orologeriaduomo.it
Telefono	02/874520

Your personal data are collected and processed for the purposes listed below, with the clarification of the typology of the data processed and of the reason legitimating the processing (legal basis):

Purposes	Data Processed	Legal Basis
Provide feedback to submitted requests by users/customers through the appropriate form on the site or by sending an e-mail to the e-mail addresses indicated.	Contact details (telephone number, e-mail, etc.); Name, business name, address or other personal identifying elements.	The processing shall be carried out to the extent that it is necessary for the execution of a contract of which the person concerned is a party or the execution of pre-contractual measures adopted at the request of the same, within the meaning of Article 6, par. 1, lit. b) Reg. EU 2016/679.
Send information material and/or advertising material related to products similar to those already purchased by the customer/to customers already acquired (direct marketing).	Contact details (telephone number, e-mail, etc.); Name, business name, address or other personal identifying elements.	The processing is necessary for the pursuit of the legitimate interest of the owner of the processing, within the meaning of Article 6, par. 1, lit. f) Reg. EU 2016/679.

Marketing activities	Contact details (telephone number, e-mail, etc.); Name, business name, address or other personal identifying elements.	The person concerned has expressed his consent to the processing of his personal data for one or more specific purposes, within the meaning of Article 6, par. 1, lit. A) Reg UE 2016/679.
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The conferral of data to provide feedback to its requests is necessary for the completion of the related pre-contractual/contractual fulfilments. Refusal to provide such data will result in the impossibility for the processor to carry out the instrumental activities in achieving the objectives.

In addition, by pursuing a legitimate interest, the processor may send commercials and advertising communications to customers already acquired, in promoting products similar to those already sold. In any case, you may oppose such processing within the meaning of Directive art. 21, par. 2, of GDPR.

In addition, with Your express and specific consent, the processor can process his data for promotional (present and future) initiatives of a commercial nature, sending of advertising material, direct sales, commercial communication, related to products and/or offered services. The dispatch of commercial communications can be done through the use of traditional systems (paper mail, etc.) and automated communication systems (e-mail, etc.). The conferral of data for promotional purposes is optional and, if issued, can be revoked at any time by writing to the processor at the above mentioned contact details.

The data collected will be processed by automatic or non automatic means in order to guarantee feedback to the requests received. The data will be recorded within our electronic databases accessible to staff duly instructed and instructed in the field of security and confidentiality of personal data.

Your data may be communicated to the recipients or categories of recipients below: consultants and freelancers in a single or associated form, public bodies or offices in accordance with statutory and/or contractual obligations; Postal Police for the determination of any malicious activities for the company's site.

No data arising from the Web service is communicated to third parties unless it is strictly relevant for the purpose of the processing or imposed by laws or regulations (e.g. public institutions for security reasons, etc.).

The data processor may also communicate some of its information to external entities of which it recurses for the carrying out of activities necessary for the attainment of the above mentioned and described purposes (subjects with whom the processor has stipulated contracts with, by way of example, assistance and maintenance activities of computer systems and management software, etc.).

The subjects mentioned above, who process their data on behalf of the processor, have been expressly appointed by the latter, data controllers.

The list of data controllers may be requested by contacting the owner at the following addresses:

PEC	orologeriaduomo@pec.it
E-mail	info@orologeriaduomo.it
Telefono	02/874520

Your personal data may, finally, be processed by the staff within the company, specifically instructed and authorized by the processor, to perform data processing operations.

Your personal data shall be processed by the processor only for the time necessary for the above mentioned purposes. In particular it must be aware, in order to ensure that the data are processed as correctly and transparently as possible, with respect to the duration of the processing, that:

- The personal data acquired to provide feedback to Your requests will be processed for the time necessary to answer Your questions;
- In the event that to Your request of information follows the stipulation of an agreement (for example, buying and selling), Your personal data will be retained for civil, accounting and fiscal purposes, as well as for the exercise of the right of defense of the Data Controller, for a period not less than 10 years from the end of the contractual relationship with the Controller;
- The personal data acquired for marketing purposes will be processed and kept for 24 months.

Processing can be carried out through automated processes that do not determine the profiling of the interested and through non-automated means (paper archives) and will be done through methods and tools suitable to guarantee the safety of data.

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

During the period in which the processor is in possession or carries out the processing of his data, you, acting as the person concerned, may at any time exercise the following rights:

- **Right of Access** – you have the right to obtain confirmation about the existence or otherwise of a processing concerning Your data and the right to receive any information relating to the same process;

- **Right to rectification** – you have the right to obtain the rectification of Your data in our possession, if the same are incomplete or inaccurate;
- **Right to erasure ('right to be forgotten')** – In certain circumstances, you have the right to obtain the erasure of Your data contained within our archives if not relevant for the continuation of the contractual relationship or necessary by legal obligation;
- **Right to restriction of processing** – upon the occurrence of certain conditions, you have the right to obtain the limitation of treatment concerning Your data, if not relevant to the continuation of the contractual relationship or necessary by legal obligation;
- **Right to data portability** – you have the right to obtain the transfer of Your data in our possession in favor of a different processor;
- **Right to withdraw consent** – you have the right to withdraw Your consent to the processing of Your data at any time, while remaining subject to the lawfulness of the consent-based process prior to revocation;
- **Right to lodge a complaint with a supervisory authority:** Garante per la protezione dei dati personali, Piazza Venezia 11-00187, Rome (RM), Italy (IT), Email: [garante@gpdp.it](mailto:garante@gpdp.it), Certified email: [protocollo@pec.gpdp.it](mailto:protocollo@pec.gpdp.it).
- **Right to object:** You have the right to object, at any time to the processing of personal data made for direct marketing purposes. In this case, the data will no longer be subject to treatment for such purposes.

The above rights may be exercised against the processor by writing to the above-mentioned contact details.

The exercise of its rights as a person concerned shall be free of charge within the meaning of article 12 GDPR. However, in the case of unfounded or excessive requests, including for their repetitiveness, the processor may charge a reasonable fee in the light of the administrative costs incurred to manage his request, or deny the satisfaction of his request.

## **COOKIES POLICY**

### **BROWSING DATA**

Software applications aimed at the operation of this website to acquire, during their normal exercise, certain personal data whose transmission is implied within the normal IP protocol of Internet communication. This information is not collected to be directly associated with the identified concerned, but which by their very nature could, through subsequent elaboration and correlation with data held by third parties (providers), allow to Identify users.

This category of data includes the IP addresses or domain names of the computers used by users connecting to the site, the date and time of the request, the addresses in Uniform resource identifiers (URI) of the requested resources, the file size obtained in response from the server, the numeric code indicating the status of the response given by the server (OK, error, etc.) and other parameters related to the operating system and the user's computer environment.

This data are used for the sole purpose of obtaining anonymous statistical information on the use of the site and to control its correct functioning and are erased immediately after processing.

This website may disclose personal data which, if required in accordance with the law, may be communicated to the judicial authority for the purpose of State protection or prevention; Investigation or suppression of offences; To guarantee the protection of the personal data of the interested parties who use the on-line services of the site; For any defensive investigations, or to assert or defend a legitimate right and interest of the

processor in court, in respect of the principles of relevance and not over the purpose of the treatment.

## **COOKIES**

Cookies are small files recorded on your hard drive. This allows easier navigation and more ease of use of the site itself. Cookies generally allow you to obtain access to information already stored on the computer of the person concerned for purposes that may be of a commercial nature (e.g. profiling) or technique (to ensure the correct functioning of the site visited ). In accordance with Directive 2009/136/EC, no explicit consent will be required for the use of cookies because only session cookies, or instrumental cookies to the correct functioning of the website, are to be used.

No use of cookies will be made for the transmission of personal information, nor are persistent cookies of any kind used, or systems for tracking users.

The use of so-called session cookies (which are not persistently stored on the user's computer and fade away with the closure of the browser) is strictly limited to the transmission of Session identifiers (consisting of random numbers generated by the server).

Required to allow safe and efficient exploration of the site.

The so-called session cookies used on this site avoid the use of other computer techniques potentially detrimental to the privacy of users' navigation and do not allow the acquisition of personal identifying information of the user.