

SERENO S.P.A.
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12044 CENTALLO (CN)
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Informativa ex art. 13 del D.lgs. n. 196/2003

02 June 2015

The CEO respects his customers and this website user's privacy.

In this page we intend to describe in a transparent, detailed and exhaustive way, the management modes of the website itself with reference to the personal data treatment of the users that consult it.

The present document is given following the italian art.13 D.Lgs. n. 196/2003 and the measure taken by the Privacy Guarantor on 8th May 2014, with reference to the personal data treatment of the users of the website grupposereno.it, from the CEO himself.

The present privacy document does not refer to the services offered from third-parties (to whom it can be possible to access through the links on the website) and to their treatment measures concerning the user's personal data.

We advise you to read carefully, on the websites of the third-parties, the relative privacy documents, about how your personal data will be treated and eventually shared.

The CEO has no power control on those third-parties and he declines every responsibility concerning the treatment of the user's personal data, that would convey through those websites.

The present document could vary or be integrated in order to become updated compared to the legislation and/or adapted to the eventual technical modifications made to the website or to eventual changes in the objectives or in the data treatment modes.

The CEO will inform with dedicated advices about eventual changes, but we advice to control periodically this page, in order to stay updated. The eventual updated versions, that will display the date in which the update has been made, will be published on this webpage and will become effective immediately after the publication.

1. The treatment owner

The owner of the personal data treatment, collected through this website is SERENO S.P.A., an Italian company with headquarter in Regione San Quirico, 670 - 12044 CENTALLO (CN), C.F. and P.Iva 01020740047, e-Mail: info@grupposereno.it, indicated also as "Owner". The list of the eventual external people responsible for the treatment can be asked by sending a simple written request to the owner at the addresses above.

2. Treatment objectives

The user's personal data will be used by the owner in order to provide services and to personalize and always improve the use of the website from the users.

In case the user is not 18 years old yet, or has no ability to act, the present Privacy document is addressed to the subject in charge by the law, who is the only subject entitled to give the express consent.

3. Types of data, objects of the treatment.

The personal data, that will be collected and treated by the Owner, are the one related to the information eventually given by the user through the contact *form* on the website, the information eventually given at the moment of the registration to the *newsletter*, the eventual use of the social networks, and the browsing data, included the technical *cookies*, ecc.

3.1 Data freely given

The data that the user gives optionally and freely through the e-mail sending to the addresses on the website (or through the compilation and sending of various forms present on the website) will be acquired by the Owner. In particular, besides the user's email address, necessary to answer, it will be acquired the other eventual personal data to whom the electronic communication refers or in any case included in the email message. Those data will not be in any case spread or communicated to third-parties on the Owner's organization, and they will not be used to define profiles or personalities of the subjects or for any direct or indirect commercial or advertising aims and, anyway, they will be kept exclusively in order to maintain the correspondence.

3.2 Newsletter

The newsletter service is reserved to specific categories of registered users.

To provide and handle this service, the Owner uses the services and instruments given by the website MailUp. To get more information about the personal data treatment from MailUp, the Owner advises to consult carefully the following link <http://www.mailup.it/informativa-privacy.htm>.

The failure to report the personal data will not cause any consequence to the user except, in case of non-reporting of necessary data, the failure for the user to benefit the requested services.

3.3 Social Network

The Owner gives the user the possibility of sharing the website links, using their own Facebook, Twitter, Google+, Tumblr, LinkedIn and Pinterest accounts. The Owner will not keep the password of those accounts. If you would like to use the social functions, we advise you that we could use your name or profile image on our website.

3.4 Geolocation

During the website surfing, the Owner can acquire information from your device, including your position. The Owner can use those info to provide you services and/or announces available in your geographical area, exclusively based on your device settings.

You can at any time turn off the geolocation function through your device settings. To have more information about how to disable this service on your device, we advise you to contact the supplier of your mobile service or the producer of your device.

3.5 Data treatment related to the services employed, accessible with the use of login details.

Some website services are dedicated to specific categories of registered users. To complete the process of registration the user will have necessary to give the following personal data:

- Name and surname
- Address
- Telephone number
- Email address

The user will also have to indicate a *username* and *password*.

The reporting of any other personal data required in the process of registration is optional and entirely depending on the user's willing. The data provided for the use of the services accessible with login details, together with a physical address, could also be treated:

- a. To invoice the paid services and/or the products purchase requested from the registered user

- b. To send to the registered user updates (even customized) on the Owner activities, in particular concerning new services, special offers, new products, surveys, opinions and other types of communication related to the Owner services
- c. For the marketing activity done by the Owner, but not limited to, as the sending by emails of updates and/or newsletters (even customized) on the activities/products/initiatives/promotions from the Owner, and to carry out statistical and commercial studies and researches.
- d. For any objective related to the performance of the website services.

The failure to report the personal data will not cause any consequence to the user except, in case of non-reporting of necessary data, the failure for the user to benefit the requested services.

4. Treatment methods and spread of personal data

The personal data kept for the objectives above, are processed by the owner in a correct and lawful way, through the massive use of automated or semi-automated tools.

Those data will not in any case or way be spread or communicated to third parties, except for the duties provided by the law.

Excluding the case in which it is otherwise specified in relation to the single objectives of the treatment as above, the personal data collected could be communicated to subjects in charge (even external) of the treatment, in relation to the skills and functions of each, to satisfy the foretold aims or to implement specific regulations and contracts.

The personal data processed by the Owner are not in general communicated to other subjects, except in the case it would result necessary following some legislative or contractual dispositions or in order to fulfill specific tasks.

In that case, the foretold can, in particular, become aware of the following subjects or the following subjects categories, respecting the limits in which this is necessary for fulfilling the legislative and contractual duties:

- i. Consultants or collaborators, internal or external, to respect the current legislation and/or the execution of the contractual services in the relationship with the individual concerned (for examples job consultants, legal consultants, accountants, tax experts, ecc.)
- ii. Judicial authority or other public authorities, in the respect of the aims above specified or laws obligations

5. Voluntary nature of the data reporting and of the consequences of an eventual rejection from the user

Except the eventuality in which the data acquisition would be done automatically, because of the surfing on the website from the user, or in case of the needs of data in order to benefit from the services, requested from the user, the contribution of any other personal information is absolutely optional.

The non-reporting of optional data does not have any consequence for the user.

The non-reporting of necessary data can instead cause the impossibility of using the services for which those data are needed.

6. Rights of the subjects concerned

Under article 7 d.lgs. n. 196/2003, in quality of subject concerned in the treatment, the user has the right to obtain information about:

a. the existence or not of personal data, which concerns him, their contents and origins, as well as their communication in understandable form; the aims and the treatment modes and the logic applied in the treatment done with the help of electronic tools;

b. the subjects or categories to whom the personal data could be communicated or who could become aware in quality of representative in the State field, managers or people in charge.

The user has also the right to obtain:

- The update, the rectification, if interested, the data integration;
- The removal, the anonymous transformation or the data treated in violation of the law, including those for which is not necessary the keeping in relation to the aims for which the data has been collected or subsequently treated;
- The proof that those operations have been brought, also concerning the contents, to the attention of those to whom the data has been communicated or spread, except the case in which this fulfillment is impossible or involves the excessive use of means compared to the protected right

The user has, in the end, the right to oppose, in whole or in part:

- Because of legitimate reasons concerning the personal data treatment that concerns him, relevant to the aim of the collection;
- To the personal data treatment that concerns him with the purpose of sending advertising or direct selling material or for marketing surveys or commercial communications.

7. Duration of user's personal data conservation

The Owner will keep the personal information of the user registered to the Newsletter for all the time during which this subscription will remain active. The Owner will also keep the other user's personal information for all the time necessary to fulfill its obligations ex lege, to solve disagreements and to make the done deals valuable.

8. Information

The rights above mentioned can be exercised from the user at any time, sending a simple request to the Owner through registered letter, fax or email to the above written contacts. The Owner will provide to contact or inform the user as soon as possible and, anyway, within 15 days from the date of request.