

NOTICE REGARDING PROCESSING THE PERSONAL DATA OF ONLINE USERS – COOKIE POLICY
PURSUANT TO REGULATION (EU) N° 2016/679 (“GDPR”)

	DATA CONTROLLER	Il Borro Srl Loc. Borro 1 - 52024 San Giustino V.no VAT N°: 01261410516 Tel ilborro@ilborro.it (“Company”).
---	------------------------	---

	PROCESSED PERSONAL DATA Browsing data.
---	--

	COOKIE POLICY ABOUT COOKIES Cookies are data created by a server and stored in a text file on the hard disk of the user’s computer or on any device used by the user to access the Internet (smartphones, tablets). They allow collecting information on the user's experience when browsing the website. Cookies may be stored permanently on your computer and they may have a variable duration (so-called persistent cookies), but they can also disappear when the browser is closed or have a limited lifespan (so-called session cookies). Cookies can be installed by the website you are browsing (so-called first party cookies) or may be installed by other websites (so-called third-party cookies). HOW WE USE COOKIES 1. <u>Technical cookies</u> a. <u>Session/browsing cookies</u> : The use of the so-called session cookies (which are not stored persistently on the user's computer and disappear upon closing the browser) is strictly related to submitting session identification (consisting of random numbers generated by the server) required to allow safe and efficient browsing of the website and its applications. The so-called session cookies used in the website avoid using other computer techniques potentially detrimental to confidential browsing of the users. In addition, they do not allow the acquisition of the user's personal identification data. They do not require your consent. b. <u>Persistent cookies</u> : persistent cookies remain on the device even after leaving the website, until the user deletes them or until they reach their date of expiration. The website creates this type of cookies and stores them on the device so as to be able to read them when the user visits the website again. For example, this allows retrieving the set preferences (e.g. wish list, basket...) even upon visiting subsequently. They do not require your consent. 2. <u>Analytical cookies</u> : cookies installed for collecting aggregated information mainly of statistical nature (how long one stays on a website, number of website visitors...). a. <u>First party analytical cookies</u> : similar to technical cookies in that installed directly by the website that one is browsing to improve the use thereof. They do not require your consent. b. <u>Third party analytical cookies</u> : analytical cookies created and installed by third parties to analyse the users’ browsing behaviour to create statistics regarding visits or improve the content offer, show products similar to each other and possibly position targeted advertising on the web pages. We use Google Analytics system, a web analysis service provided by Google LLC ("Google"). Just like other systems, Google Analytics uses "cookies to allow the website to analyse how the users use the website. The information generated by the cookies regarding the use of the website by the user (including the IP address) will be transferred to, and be stored on Google servers in the United States. Google will use this information for tracking and analysing how the website is used, preparing reports on the activities of the website and providing other services regarding the use of the Internet. Google may also transfer this information to third parties if this is required by law or should such third parties process the aforementioned information on behalf of Google. Google will not link the user's IP address to any other data in Google's possession. In any case, the user may decline to use cookies by selecting the appropriate settings on the browser thereof, but this could hinder access to some functionalities of the website. Given that the IP address is unencrypted, using such cookies requires your consent. By clicking “Continue” on the banner or by continuing browsing the website, the user allows Google to process the data thereof for the aforementioned modes and purposes. 3. <u>Profiling cookies</u> : cookies used for tracking the user's browsing of the web and creating profiles on the preferences, habits, choices etc. Advertising messages matching the preferences
---	--

previously expressed by the same user while browsing online can be transferred to the user's terminal by means of these cookies.

- a. First party profiling cookies: used and installed by Il Borro to collect information on the user's browsing behaviour with the aim of offering advertising messages that are most relevant to the user's interests. This means that they are also used for limiting the number of times that the user views a given advertisement: to IL BORRO WINES, this means communicating more efficiently, while to the user this means receiving advertisement that is less invasive and closer to the preferences thereof. While browsing the IL BORRO WINES website, advertising cookies allow getting confirmation that the user is viewing advertisement messages, showing the user the advertising content that the latter may be interested in based on what the user visited previously. While the user is visiting other websites, these cookies also allow showing the content recently viewed in the IL BORRO WINES website for advertising purposes. The IL BORRO WINES website uses advertising cookies exclusively in anonymous form: the advertisement is targeted but the user cannot be identified. The advertising cookies used are permanent, despite the fact that they remain in the user's device for a limited period of time. They require the user's consent.
- b. Third party profiling cookies: used and installed by third parties to track the user's web browsing behaviour and create profiles on the user's preferences, habits, choices... These cookies are managed by third party companies such as [.....]. Social buttons/widgets, i.e. those particular "buttons" showing social network icons (for example, Facebook and Twitter) can be found on the IL BORRO WINES website. These "buttons" allow users browsing the website to reach and directly interact with the social networks by means of a "click". By clicking on the Social buttons/widgets, the social network acquires data regarding the user's visit on the IL BORRO WINES website and simultaneously releases the profiling cookies thereof.

MANAGING COOKIE PREFERENCES

You can give consent to use cookies through one of the following methods:

- by clicking the "Continue" button present in the banner containing the brief notice, that appears when the user visits the website;
- by continuing to browse the website by accessing any other area of the website or by selecting an element of the same page.

HOW TO CHANGE COOKIE SETTINGS

Most internet browsers are initially set to accept cookies automatically. This means that the user has the option to set the browser thereof so as to accept all cookies, just some cookies or decline them thus disabling use thereof by third party websites at any time. Furthermore, the user can normally set the preferences of the browser thereof so as to be notified whenever a cookie is stored in the user's computer. Lastly, the user can delete the collected cookies from the hard drive of the device thereof at the end of each navigation session. If one wants to delete the cookies installed in the browser's cookies folder, it should be borne in mind that each features different settings management procedures.

The user can get specific instructions for some of the main browsers by opening the links below:

Microsoft Windows Explorer: <http://windows.microsoft.com/en-us/windows-vista/block-or-allow-cookies>

Google

Chrome: https://support.google.com/chrome/bin/answer.py?hl=en&answer=95647&p=cpn_cookies

Mozilla Firefox: <http://support.mozilla.org/en-US/kb/Enabling%20and%20disabling%20cookies>

Apple Safari: <http://docs.info.apple.com/article.html?path=Safari/5.0/en/9277.html>

If you do not want to receive Google Analytics cookies, you can decline by connecting to the page: <https://tools.google.com/dlpage/gaoptout/>

If you want to learn more on cookies in general, you may visit the <http://www.allaboutcookies.org>

If you want to learn more on behavioural advertising and online privacy, you may visit the page <http://www.youronlinechoices.com>

If you want to learn more on Google Analytics cookies, you may

visit <http://www.google.com/intl/it/analytics/privacyoverview.html>

If you want to learn more on Criteo cookies used in our website, the user may

visit <http://www.criteo.com/en/privacy-policy>

Cookies	Name	Purpose	First / third party	Legal grounds	Duration	More info
Google Analytics	GA	Analytical	Third party	Consent	Of the session	<p>The Google privacy policy and information on how Google cookies are used are available in the following links: https://www.google.com/intl/it/policies/privacy/ https://www.google.com/intl/it/policies/technologies/</p> <p>You can download a plug-in of the Browser to permanently decline Google Analytics cookies by opening the following links: https://tools.google.com/dlpage/gaoptout?hl=it</p>
		<p>OBLIGATION TO SUBMIT DATA</p> <p>Personal data processed by installing first party technical cookies and analytical cookies is required to guarantee correct browsing in the website.</p> <p>Consent to installing third party analytical cookies and profiling cookies is optional. Your personal data will be processed by such cookies only after your consent expressed as indicated above.</p>				
		<p>DATA RECIPIENTS</p> <p>Data can be processed by third parties operating as independent controllers such as, by way of example, supervisory/monitoring bodies and entities.</p> <p>The data can also be processed, on behalf of the Company, by third parties designated as data processors, who can be given appropriate operating instructions. These entities essentially fall in one of the following categories:</p> <ol style="list-style-type: none"> a. companies providing email delivery services; b. companies providing services instrumental towards achieving the goals outlined in this notice (IT suppliers, companies providing website management and maintenance services...); 				
		<p>ENTITIES AUTHORISED TO PROCESS DATA</p> <p>The Data may be processed by the employees of the company functions designated to achieve the aforementioned purposes, which were explicitly authorised to process data and which received appropriate operating instructions.</p>				
		<p>TRANSFER OF PERSONAL DATA IN NON-EUROPEAN UNION COUNTRIES</p> <p>Data collected using cookies may be transferred to non-European Union countries and the USA in particular, at Google's servers, whose data protection level was deemed appropriate by the European Commission (USA, Privacy Shield)</p>				
		<p>RIGHTS OF THE DATA SUBJECT - COMPLAINT BEFORE THE SUPERVISORY BODY</p> <p>By contacting, calling 055.977053 or by email to ilborro@ilborro.it, the data subjects can request permission from the controller to access data related thereto, to delete it, to correct inaccurate data, to supplement incomplete data, to limit processing in the cases provided for by article 18 GDPR, as well as object to the processing in case of legitimate interest of the controller.</p> <p>Furthermore, should the processing be based on consent or contract and be carried out using automated means, the data subjects have the right to receive the Data in a format that is structured, commonly used and readable by an automatic device, as well as transfer the data to another data controller without any hindrances whatsoever if technically feasible.</p> <p>The data subjects have the right to withdraw consent granted for marketing and/or profiling purposes, as well as object to the processing of the data for marketing purposes, including direct marketing-related profiling. This without prejudice to the data subject's right of preference to be contacted for the aforementioned purpose exclusively through conventional means for expressing the objection thereof solely upon receipt of communications through automated means.</p> <p>The data subjects have the right to lodge a complaint before the due Supervisory body in the member country of residence or work or the country where the alleged breach occurred.</p>				

