

Mod.: IS – Last Updated on 12/2023

Data protection privacy notice

*Articles 13 and 14 of EUROPEAN REGULATION 679/2016
Legislative decree 196/2003 amended by Legislative decree 101/2018*

Dear Data Subject,

This notice will describe the website management methods with reference to the processing of visitors' personal data and data processing practices through this website. In compliance with articles 13 (on personal data collected from the data subject) and 14 (on personal data that have not been obtained from the data subject) of Regulation (EU) 2016/679 (hereinafter referred to as the "GDPR"), this Website Users shall be informed on the data processing carried out only through this Website, and not through third party websites visited starting from any links provided by this Website (in this case, the privacy notices provided by the corresponding website data controllers should be viewed). This Website and the services hereby provided are restricted to users over the age of 18, hence the personal data regarding people under age shall not be processed and, at their request, any data unintentionally collected shall be immediately deleted.

1. Controller

The Data Controller is Calicantus Srl, based in Via L. Mazzon, 28/30 - 30020 Quarto d'Altino (VE), Tax code /VAT registration number 03757590272, (hereafter the "Controller"). The Controller reserves the right to appoint as Data Protection Officer a web agency or a consultant for technical assistance, maintenance procedures, technical management and similar tasks regarding the Website, whose details may be communicated upon request to the address above. The Collector and the Data Protection Officer may also process Users' data through their internal representatives, specifically appointed and provided with all the necessary instructions and mandates.

The Data Protection Officer (DPO) can be reached at the following contact points: telephone: +39 348 3165267, email: nicola.ghinello@dpo-rpd.com.

2. Categories and sources of processed data

- Navigation data (when active, the information systems and software procedures that enable the website to work acquire some personal data that are implicitly transmitted while using Internet communication protocols. This data category includes: IP addresses, the type of browser, the operating system, the domain name and the web pages from which the visitor came or left, information on the pages viewed by users within the website, the time of access, the amount of time spent viewing each page, internal path analysis and other parameters related to the user's operating system and information environment. These technical/computer data are collected and used solely in an anonymous and aggregated form, and processed with the purpose of enabling and monitoring the proper use of this site and obtaining anonymous statistical information on its use, so they are deleted immediately after processing).
- Cookies (for further information, read our **Cookie Policy**)
- Data willingly provided by the User, including:
 - Common personal data (ID, personal, billing and similar data)

- Only exceptionally, special categories of data (art. 9 of GDPR)
- Only exceptionally, personal data relating to criminal convictions and offences (art. 10 of GDPR)

Sources: navigation, other websites, cookies and the like; user; public sources.

Firstly, we will process navigation data, including cookies.

We may also process data willingly provided by the user, i.e. through contact forms or following communications via email, including common personal data (identification, personal, billing and similar data) and, exceptionally, special categories of personal data in compliance with art. 9 of GDPR or personal data relating to criminal convictions and offences in compliance with 10 of GDPR only if strictly required to follow up any information requests and with the user's prior consent.

Data may derive from automatic sources or from voluntary sources, as well as public ones. For instance, they may originate from the user's navigation, bringing about data regarding previously visited websites, including cookies and similar technologies. Data may also be provided voluntarily by the user or any correlated subject. In some other case, they could derive from public sources, such as information processed within research projects or coming from registration reports, public databases and the like.

3. Purposes of the processing

The Website Users' personal data, as described above, shall be processed in accordance with the provisions of the GDPR for the Website operation, including, but not limited to, with regard to page navigation and the data collection procedures therein described, contact forms, any registration/restricted area access procedures, newsletter subscription and the like. In particular, the personal data supplied to the Controller will be processed for the following purposes:

- to follow up any requests by the User to the Controller through the Website and its communication tools (contact forms, information request forms, etc);
- for informative communications regarding the services provided by the Controller, following information requests through emails, contact forms etc.;
- for subscriptions to events or any related activities organized by the Controller (i.e. participation verifications, notices on updates or variations regarding the event, etc);
- for any ancillary purposes or purposes related to the ones described above, within the scope of activities of the Website.

Generic data, including the data automatically collected during navigation, will be processed solely for verification purposes and to monitor accesses to the Website. This also includes technical cookies, such as session cookies, functional and analytical cookies complying with the prerequisites specified by the Data Protection Supervisor. In particular, as far as the latter are concerned, they shall be equated to technical cookies if these are processed and used directly by the Website. In any case, for these analytical cookies the Website is set to anonymize IP addresses and proceed to the data processing amendment in compliance with the Data Protection Supervisor's clarifications. The collection and use of these navigation data (subject to IP address anonymization) enable

to monitor the Website performance and to improve the service provided, offering a better navigation experience to the User. For further information, see the specific Cookie policy.

4. Legal basis for processing

The processing of personal data is based upon the compliance with contractual or precontractual obligations regarding the User's request (i.e. information requests on the services provided by the Data Controller, requests for quotations, etc.), as well as – where necessary - on free and informed consent, provided by filling in the specific information fields on the data collection and provision form, or by ticking the corresponding box, if present.

It should be noted that the compilation of special fields provided for in the information request form is inherent in the request itself and that therefore this involves the fulfilment of a pre-contractual or contractual obligation, depending on the context. Consent may be requested later for the processing of further data.

A specific privacy notice (other than this one) will be provided whenever necessary.

Processing is also based on legitimate interest, including the right to information, further discussed in the next paragraph.

5. Legitimate interest of the Controller

Personal data processing is also based on the Data Controller's legitimate interest, including the exercise of his/her rights with reference to information society, the performance of contractual obligations and direct marketing operations (carried out in accordance with the modalities, procedures and deadlines provided for by the law).

6. Mandatory data provision

The provision of the User's navigation data, for the hereinabove purposes, depends on the privacy level setting enabled or disabled by the User through the browser. In some cases disabling may prevent navigation on this Website. Indeed, for some forms, the provision of navigation data and/or use of technical cookies is compulsory for the correct operation of the Website itself.

The provision of some personal data is, at all events, required for the structure itself of the Website and its procedures, whereas any request for further voluntary information will be accompanied by a specific approval checkbox. The provision of any other data is optional, depending on the type of information the User is willing to provide to the Website.

Without prejudice to the above, for instance, the provision of the email account - as well as the other mandatory data marked with an asterisk - is necessary to fulfil the information request sent through the contact form. The other data are optional.

If mandatory data for a specific request (i.e. the email account via the information request form) are not provided, the Data Controller will not be able to fulfil the request.

PROVISIONS APPLICABLE TO ALL PROCESSING SITUATIONS

At all events, should the data subject have consented to authorize the Controller to pursue all the purposes mentioned above, he/she will have the right to withdraw his/her consent at any time.

In compliance with article 21 of the Regulation, it is hereby expressed clearly and separately from any other information, that the data subject shall have the right to object at any time to the processing of his/her personal data consented to for the above-mentioned purposes and that, should he/she withdraw his/her consent to the processing of his/her personal data, the latter shall no longer be processed for such purposes.

7. Possible recipients of the personal data

The Data may be transferred to any of the Controller's connected, associate or subsidiary companies, or to consultants, or even to third parties operating on behalf of the Controller, to fulfil the services associated with the purposes specified in this notice, both within and outside the UE (in this case, only the parties complying with current regulations).

Navigation and similar data (as above defined), as well as profiling data of third parties (as described in the Cookie Notice of this Website), shall be transferred to the corresponding third parties involved, unless the latter manage them directly as Controllers.

In any case, the Data may be transferred to the Processors and to authorized and duly trained parties, strictly within the scope of the purposes of the processing.

For brevity's sake, the detailed list of these subjects is available at our premises.

8. Period of storage

The Data willingly provided by the data subject will be stored until his/her consent is withdrawn through the browser, cookie clearing, or at his/her (express or any other form of) request. Navigation data shall be stored, in compliance with the principle of proportionality, in such a manner so as to ensure the identification of the data subject only for the period strictly necessary for the purposes for which the data were collected and subsequently processed.

The terms described above do not include any case in which data require to be stored for a longer period in order to establish or defend a right or to comply with specific legal obligations or Authority orders.

9. Rights of the data subject

The data subject has the right to withdrawal, rectification, erasure ("right to be forgotten"), restriction of processing, notification in case of rectification, erasure or restriction, portability, the right to object and not to be subject to automated individual decision-making, including profiling, pursuant to articles 15 to 22 of the GDPR. These rights can be exercised according to the terms and conditions as per art. 12 of GDPR, through written communication to the Controller (see art. 10).

The Controller will provide a suitable reply as soon as possible, and in any case within one month from the receipt of the request.

10. Right to withdraw consent (Modalities for exercising rights)

Where applicable, the data subject has the right to withdraw his/her consent at any time and/or exercise his/her rights by sending:

- a registered letter to Calicantus Srl with an expressed request (see the address in the letterhead);
- an email to privacy@calicant.us.

11. Complaints

The data subject has the right to lodge a complaint, as per articles 77 and following articles of the GDPR, to a supervisory authority, which for the Italian state is the Personal Data Protection Supervisor. The terms and modalities for the submission of complaints are established and governed by current national regulations. The complaint is without prejudice to administrative and jurisdictional actions, which for the Italian state may be brought either to the Data Protection Supervisor itself or to the competent Court.

12. Profiling

The personal data provided while browsing this Website, or by filling in the forms therein, may be subject to profiling by third-party providers through third-party cookies.

Profiling enables third-party providers – independent Controllers of their personal data processing for different profiling purposes to the Controller of this Website - to assess specific personal aspects of the Data Subject, in particular as regards his/her preferences, interests, and tastes based on the visited pages and actions taken, so as to enable these independent Controllers to offer to the Data Subject a more specific and targeted service.

For further information, see the Cookie Notice.

13. Data Controller, Data Protection Officer (DPO), Appointed/Authorized parties, Data Processors

Hereafter is some information we wish to share with you, not only to comply with legal obligations, but also because transparency and accuracy are a fundamental part of our activity.

Controller. The Controller of your data processing is Calicantus Srl, in charge of the lawful and correct use of your personal data and available to be contacted for any questions or requests at: telephone: +39 0422 782890, email: privacy@calicant.us.

D.P.O. (Data Protection Officer). You can also contact our Data Protection Officer to obtain information and submit any requests regarding your data or to report any malfunctioning or any other problems you may have encountered.

The Controller has appointed as its Data Protection Officer Nicola Ghinello, who may be reached at: telephone: +39 348 3165267, email: nicola.ghinello@dpo-rpd.com.

Appointed/Authorized parties. The updated list of the people who have been appointed/authorized for the processing is kept at the Controller's premises.

Data Processors.

For brevity's sake, the detailed list of these subjects is available at our premises.

14. Social media plugins

This Website may include some social media (i.e. Facebook) plugins. Social plugins are special tools used to incorporate social media features directly into a website (i.e. the "Like" feature on Facebook) and are marked with the corresponding social platform logo. If you visit a page of this Website and interact with the plugin (for instance by clicking the "Like"

button), or you choose to leave a comment, the corresponding information is transferred directly from the browser to the social network platform (Facebook, in this case) and saved by the latter. For information on the purposes, type and methods of collection, processing, use and storage of personal data by the social network platform, and the ways in which you can exercise your rights, see the privacy notice of the social network in question.

15. Links to third-party websites

From this Website it is possible to access third-party websites through specific links. The Controller declines any responsibility regarding the possible management of personal data by third-party websites and the management of authentication credentials provided by third parties.

16. Cookies

Cookies are blocks of data sent by a web server (i.e. the Website) to the user's Internet browser, which automatically saves them on the computer and sends them back to the server across different browsing sessions. For information on the characteristics and types of cookies, on how they can be used, removed, deleted or disabled, see the corresponding Cookie Notice.

How to contact us

Calicantus srl is happy to receive your opinions on this Privacy Notice.

You can contact us at: privacy@calicant.us.