

COOKIE POLICY

We are SOCIETA' COOPERATIVA DELTA SERVICES, VAT number 01968600021, with registered office at Via Delleani, 37/d - 13900 Biella (BI), and we are the Data Controller. We are aware of the importance of privacy protection regarding the processing of our users' personal data. Therefore, we inform you that your personal data is processed in accordance with EU Regulation no. 2016/679 (hereinafter "GDPR 2016/679"), the Privacy Code, and all related regulations. You receive this Privacy Notice to allow you access and use of the cloud-based platform called "Aldebaran Plein Air" at www.aldebaranpleinair.it and to use the services you purchased, according to the provided instructions. Please refer to the Privacy Notice for full descriptions of: purposes of data processing, methods of processing and data retention, provision and refusal of data, legal bases and legitimate interest, data communication, data dissemination and transfer abroad, data subject rights, security measures, special categories of personal data, existence of automated decision-making processes including profiling.

a) Types of Data Processed

1) Technical Data The personal data processed during the use of the cloud-based platform "Aldebaran Plein Air" at www.aldebaranpleinair.it automatically without your consent are: IP address (internet protocol), date and time of connection, physical address of the device connecting, addresses of requested resources, number of clicks made. These data are used exclusively for anonymized statistical purposes, being deleted after processing at the end of the browsing session and, in any case, within 7 days, they may be requested if the platform is the victim of cybercrimes. Cookies are also automatically processed as described below. The legal basis for the lawful processing of your technical data and necessary cookies (under Art. 6 para. 1 letter b) GDPR 2016/679) is the performance of pre-contractual and contractual measures adopted at your request, aimed at allowing you to access and use the cloud-based platform "Aldebaran Plein Air" at www.aldebaranpleinair.it and to use the purchased services according to the provided instructions.

2) Data Voluntarily Provided by the User We recommend not to enter or send personal data through the platform that qualify as "special categories of personal data," which reveal "racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as data concerning health, genetic data, biometric data intended to uniquely identify a person, data concerning a person's sex life or sexual orientation," as well as "data concerning criminal convictions and offenses" as defined by current legislation (Art. 9 and 10 of EU Regulation no. 2016/679). If you provide us with such special data, we will proceed with immediate deletion. Your voluntarily provided personal data are stored according to the terms and methods described in the Privacy Notice.

3) Cookies Cookies are files that the platform, or a third-party website, sends to the user's device to be stored and subsequently transmitted back to the same sites if necessary. The cloud-based platform "Aldebaran Plein Air" at www.aldebaranpleinair.it uses cookies to enhance your browsing experience on the platform. Necessary cookies are stored in your browser as they are essential for the functioning of basic functionalities. We also use third-party cookies that help us analyze and understand how you use the platform. These cookies will be stored in your browser only with your consent. You can also disable these cookies, but disabling some of them might affect your browsing experience. The platform "Aldebaran Plein Air" at www.aldebaranpleinair.it uses the following types of cookies:

Technical Cookies Session and navigation cookies aimed at enabling navigation and use of platform services, allowing the user, for example, to authenticate to access reserved areas, online purchases. Technical cookies are necessary for the proper functioning of the platform and to use and/or improve the various functions and/or requested services. The IT systems and software procedures responsible for the platform operation may acquire, during their normal operation, some Personal Data whose transmission is implicit in the use of internet communication protocols. These are not collected to be associated with identified data subjects, but by their very nature, through processing and association with data held by third parties, they could identify users. This category includes IP addresses, domain names used by Users connecting to the platform, URIs (Uniform Resource Identifiers) of requested resources, request time, method used to submit the request to the server, file size obtained in response, etc. Necessary cookies are essential for the proper functioning of the platform. These cookies ensure basic functionalities and security features of the platform, anonymously. Below is the descriptive table of necessary cookies installed on the platform "Aldebaran Plein Air" at www.aldebaranpleinair.it:

COOKIE	DESCRIPTION	Necessary	Cookie	Duration	Description
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Functional Cookies Functional cookies help perform certain functionalities like sharing platform content on social media, collecting feedback, and other third-party features. Below is the descriptive table of functional cookies installed on the platform "Aldebaran Plein Air" at www.aldebaranpleinair.it:

COOKIE	DESCRIPTION	Functional	Cookie	Duration	Description
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Performance Cookies Performance cookies are used to understand and analyze key performance indices of the platform to provide a better user experience for visitors. Below is the descriptive table of performance cookies installed on the platform "Aldebaran Plein Air" at www.aldebaranpleinair.it:

COOKIE	DESCRIPTION	Performance	Cookie	Duration	Description
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Analytics Cookies These cookies are used for analytics functionalities. Analytics cookies help understand how visitors interact with the platform, providing information on metrics such as visitor numbers, bounce rate, traffic source, etc. Below is the descriptive table of analytics cookies installed on the platform "Aldebaran Plein Air" at www.aldebaranpleinair.it:

COOKIE	DESCRIPTION	Analytics	Cookie	Duration	Description
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Targeted Advertising Cookies These cookies may be set through the platform by our advertising partners. They may be used by these companies to build a profile of your interests and show you relevant ads on other sites. They do not store personal information directly but are based solely on identifying your browser and internet device. If you do not accept these cookies, you will receive less targeted advertising. Below is the descriptive table of targeted advertising cookies installed on the platform "Aldebaran Plein Air" at www.aldebaranpleinair.it:

COOKIE	DESCRIPTION	Targeted Advertising	Cookie	Duration	Description
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Other Cookies Other unclassified cookies are those being analyzed and not yet classified into a category. Below is the descriptive table of other cookies installed on the platform "Aldebaran Plein Air" at www.aldebaranpleinair.it:

COOKIE DESCRIPTION Other Cookie Duration Description

At the first access to the platform, the cookie banner appears prominently where you can choose to: a) Click REJECT ALL and close the cookie banner by selecting the command marked with an X in the top right corner of the banner, which keeps the default settings and thus continues navigation without cookies or other tracking tools other than technical ones; b) Click COOKIE SETTINGS, where the visitor selects the cookies they want to enable; c) Click ACCEPT ALL COOKIES, where the visitor expressly consents to the use of enabled cookies and similar technologies, and in particular to the registration of such cookies on their terminal for the above purposes, or access through cookies to information on their terminal. SOCIETA' COOPERATIVA DELTA SERVICES has enabled only technical cookies.

DISABLING COOKIES MAY IMPAIR THE PROPER USE OF SOME FEATURES OF THE PLATFORM. Each browser has specific configuration instructions. More information on how to disable cookies can be found on the platform of the browser provider. Google Chrome:

<https://support.google.com/chrome/answer/95647?hl=en> Mozilla Firefox: <http://support.mozilla.org/en-US/kb/Enabling%20and%20disabling%20cookies> Internet Explorer: <http://windows.microsoft.com/en-us/windows7/block-enable-or-allow-cookies> Apple Safari: <http://support.apple.com/kb/PH5049>

Tracking Systems The cloud-based platform "Aldebaran Plein Air" at www.aldebaranpleinair.it does NOT use GOOGLE ANALYTICS in compliance with the Provision of June 9, 2022 [9782890] <https://www.garantepprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/9782890> issued by the Personal Data Protection Authority.

4) Log Files To ensure operation and maintenance, the platform, and any services provided by third parties, may collect system logs, i.e., files that record user interactions, such as their IP address.

b) WHERE YOUR PERSONAL DATA IS PROCESSED Transfer of data abroad Your personal data is recorded and stored in electronic databases located in countries belonging to the European Economic Area (EEA) that ensure an adequate level of data protection. The data collected is also processed by SOCIETA' COOPERATIVA DELTA SERVICES' staff within their roles and tasks, using suitable methods to ensure its security and confidentiality, preventing unauthorized access, dissemination, modification, or destruction. We do not transfer data to extra-EEA countries or international organizations. If, in the future, we decide to transfer data to countries outside the EEA or international organizations, we will ensure adequate levels of protection and safeguards, including adequacy decisions and standard contractual clauses approved by the European Commission.

c) WHO WE COMMUNICATE YOUR PERSONAL DATA TO Your personal data will not be disseminated, and we will not make them accessible to unspecified parties. Your data may be communicated, within the scope of their respective and specific roles, to recipients who will process them as data controllers, data processors, or persons in charge of processing. Among these recipients are:

1. Staff, consultants, or self-employed professionals in charge of managing and administering the platform "Aldebaran Plein Air" at www.aldebaranpleinair.it;

2. Public and private entities, including following inspections or verifications, such as the Financial Administration, the Social Security Entities, the Judicial Authorities, the National Labor Inspectorate, the Health Authorities, etc.;
3. Subjects that can access data by virtue of regulatory provisions;
4. Subjects entrusted with managing information systems and telecommunication networks (including email);
5. Other service providers, third-party companies that provide ancillary services for the management of the platform "Aldebaran Plein Air" at www.aldebaranpleinair.it within the scope of the purposes indicated in the Privacy Notice; The complete list of recipients is available at SOCIETA' COOPERATIVA DELTA SERVICES' headquarters and will be provided upon written request.

d) HOW WE PROCESS YOUR PERSONAL DATA The processing of your data is carried out through electronic tools and in compliance with current regulations, ensuring its security and confidentiality. In particular, your data will be processed by authorized personnel, constantly identified, suitably trained, and informed of the constraints imposed by current legislation. To ensure data confidentiality and security, SOCIETA' COOPERATIVA DELTA SERVICES has adopted specific organizational and technical measures to prevent data loss, illicit or incorrect use, and unauthorized access. For more information, see the Privacy Notice.

d) Rights of the Data Subject

At any time, you may exercise, pursuant to Articles 15 to 22 of the EU Regulation no. 2016/679, the right to:

- a) request confirmation of the existence or non-existence of your personal data;
- b) obtain information regarding the purposes of processing, the categories of personal data, the recipients or categories of recipients to whom the personal data have been or will be disclosed, and, when possible, the period of retention;
- c) obtain the rectification and deletion of data;
- d) obtain the restriction of processing;
- e) obtain data portability, i.e., receive them from a data controller in a structured, commonly used, and machine-readable format, and transmit them to another data controller without hindrance;
- f) object to processing at any time, including in the case of processing for direct marketing purposes;
- g) object to an automated decision-making process relating to individuals, including profiling;
- h) request access to your personal data and the rectification or deletion of the same or the restriction of processing that concerns you, or object to their processing, in addition to the right to data portability;
- i) withdraw consent at any time without affecting the lawfulness of processing based on consent before its withdrawal;
- j) lodge a complaint with a supervisory authority;
- k) lodge a complaint with the Data Protection Authority, following the procedures and instructions published on the official website of the Authority at www.garanteprivacy.it.

You may exercise your rights by sending a written request to SOCIETA' COOPERATIVA DELTA

SERVICES, with registered office at Via Delleani, 37/d - 13900 Biella (BI), or via certified email to the address deltaservices@pec.it.

e) Changes to this Cookie Policy

Any changes we may make to this Cookie Policy will be communicated to you by publishing the new version on the operational platform.

f) Glossary

Below are the definitions of the terms used in this Privacy and Cookie Policy pursuant to EU Regulation no. 2016/679 (hereinafter "GDPR 2016/679") and Legislative Decree 196/2003 (Privacy Code):

Personal Data

Any information relating to an identified or identifiable natural person ("data subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

Usage Data

Information collected automatically through the operational platform (including from third-party applications integrated into the operational platform), including: IP addresses or domain names of the computers used by the User connecting to the operational platform, the URI (Uniform Resource Identifier) addresses, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the server's response (successful, error, etc.), the country of origin, the characteristics of the browser and operating system used by the visitor, the various time details per visit (e.g., the time spent on each page), and the details about the path followed within the Application, with particular reference to the sequence of pages visited, the parameters relating to the User's operating system and IT environment.

Operational Platform

The cloud-based platform named "Aldebaran Plein Air" operating at www.aldebaranpleinair.it.

Processing

Any operation or set of operations performed on personal data or sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination, or otherwise making available, alignment or combination, restriction, erasure, or destruction.

Data Subject

The natural person to whom the personal data refer, using the operational platform and its related services.

Data Controller

The natural or legal person, public authority, agency, or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

Data Processor

A natural or legal person, public authority, agency, or other body that processes personal data on behalf of the Data Controller.

Third Party

A natural or legal person, public authority, agency, or body other than the data subject, controller, processor, and persons who, under the direct authority of the controller or processor, are authorized to process personal data.

Data Subject's Consent

Any freely given, specific, informed, and unambiguous indication of the data subject's wishes by which they, by a statement or by a clear affirmative action, signify agreement to the processing of personal data relating to them.

Cookies

Small pieces of data stored in the user's browser that allow for tracking.

The Data Controller - SOCIETA' COOPERATIVA DELTA SERVICES

PRIVACY AND COOKIE POLICY updated on May 29, 2024