PRIVACY POLICY pursuant to GDPR 679/2016

Data controller: AC BOAT di Bolgiani Maria Cristina (hereinafter the "Controller"), with registered office in Via Alla Parrocchia n. 10-22017 Menaggio (CO).

pursuant to articles 4 and 28 of the legislative decree 30 June 2003, n. 196 - Privacy Code (hereinafter, "Code") and articles 4, n. 7) and 24 of EU Regulation 2016/679 of 27 April 2016 on the protection of individuals with regard to the processing of personal data (hereinafter, "Regulation") pursuant to article 13 of the Code and of the Regulation informs you that for the establishment and execution of ongoing relationships with you, you have personal data (personal and fiscal).

In order to comply with the obligations established by the Code and by the community regulations on privacy in relation to your data, we invite you to take note of the following information and to consent to the processing of personal data that our company will acquire.

1. INFORMATION COLLECTED

We only collect information that is necessary, relevant and appropriate to the purpose for which it is provided. The information we collect may include some or all of the following:

- Identity data: name, surname, username or similar identifier and title.
- Contact information: billing address, delivery address, email address and telephone numbers.
- Financial data : bank account and payment card details collected solely for the purpose of completing the purchase.
- Transaction data: Payment details and other details about products and services purchased or sold.
- **Profile data:** purchases or orders made, any social profiles (if applicable), preferences, feedback, communications and responses to internal surveys, password and username, if applicable (customer portal).
- Usage Data: Information on how the website, products and services are
- Marketing and communication data: preferences in receiving marketing and third party communications and communication preferences.
- Technical data: Internet Protocol (IP) address, access data, browser type and version, time zone setting and browser plug-in location, types and versions, operating system and platform and other technologies on devices used to access corporate websites.

2. USE OF INFORMATION

Only the information necessary for the following purposes is processed:

1. Operational management and purposes strictly connected to this for accessing the website.

The Company collects contact data, financed and use of the website to allow the user to access the Personal Area, where present, and proceed with the orders of the products and / or services concerned.

Prerequisite for processing: fulfillment of contractual obligations.

The provision of data is mandatory to respond to your requests; failing that we will not be able to give you course.

2. Customer Satisfaction Surveys

The Company may use the contact details to conduct surveys aimed at measuring the level of satisfaction (so-called customer satisfaction) of the service provided.

<u>Prerequisite for processing</u>: consent. failure to provide it does not have consequences on contractual relationships.

The consent can be revoked at any time by writing to the following address: acboat@hotmail.it.

3. Marketing

The Company may process contact data for marketing and advertising communication purposes, aimed at informing the User about promotional sales initiatives, carried out through automated contact methods (e-mail, sms and other mass messaging tools, etc.) and traditional methods of contact (for example, telephone call with operator) or for market research and statistical surveys.

<u>Prerequisite for processing</u>: consent. Failure to provide it does not have consequences on contractual relationships.

The consent can be revoked at any time by writing to the following address: acboat@hotmail.it.

4. Compliance with legally binding requests to fulfill a legal obligation, regulations or provisions of the judicial authority, as well as to defend a right in court

The Company collects contact data to fulfill a legal obligation and $\/$ or to defend its right in court

<u>Prerequisite for processing</u>: legal obligations, which the Company is obliged to comply with.

3. SHARING

We do not share information with third parties, however, we may from time to time disclose information to the following categories of companies or organizations to which we pass the responsibility of managing services on our behalf: support service providers, customer contact centers, agencies and consultants direct marketing, market research and market analysis service providers, legal advisors and other professionals.

We work to ensure that all third-party partners handling information comply with data protection legislation and protect information just as we do. We disclose to them only the personal information STRICTLY necessary to provide the service they are undertaking on our behalf.

We will anonymize the information or use specific aggregate data sets where possible.

4. TERMS OF STORAGE

We do not keep personal information in an identifying format for longer than necessary.

For customers or suppliers, we keep personal information for a longer period than the treatment of potential customers / suppliers.

In the case of an ongoing relationship (for example a customer), we keep personal information for 10 years from the date of the last transaction, in order to establish, bring or defend any legal claims.

Promotional and marketing information will be kept for a maximum period of 24 months.

5. ARCHIVING

The personal data we collect may be transferred to, and stored in, a destination outside the European Economic Area (EEA), for the purposes described above. We will take all steps reasonably necessary to ensure that personal data is treated securely and in accordance with this Privacy Policy and data protection legislation. To the extent that it is necessary to transfer personal data outside the European Union, we will ensure that adequate protection measures are in place to protect the privacy and integrity of such data, including the European Union model clauses under the 'article 46 "Transfer subject to adequate guarantees".

6. COOKIES

Cookies are text files that identify your computer (via the so-called IP address) on our server. For information on the reasons why we use them, refer to the section "How we use the information we collect" of this Privacy Policy. We do not use the IP address as a means of identifying the user. Generally, there is the possibility to set the computer to accept all cookies, to be informed when a cookie is issued or not to receive cookies at all times, this is possible through the internet browser. With most browsers, this function can be reached via the 'tools' menu (eg Internet Explorer), 'edit', or 'task'. If you are having trouble finding this area, the "help" function within your browser will be able to assist you. You can also find more detailed information on cookies and how to manage them on http://www.allaboutcookies.org.

The refusal of cookies could prevent the proper functioning of the site or even prevent access to certain areas.

6.1. HOW DO WE USE COOKIES?

Depending on the function and purpose of use , cookies can be classified into technical cookies, analytical cookies, profiling cookies. All cookies are divided into proprietary cookies, installed directly by the site manager and third-party cookies, installed through the site by third parties.

Based on the characteristics and use of cookies, we can distinguish several categories:

1. navigation cookies on the website trace the path of the cookies (so-called "click stream" activity, or the recording of the paths followed by visitors to a site when passing from one page to another) without being able to know or identify the user, in order to collect statistical data on the site such as, for example, the pages visited, downloaded, and t c.

We reiterate that none of this information is associated with you individually. Cookies do not acquire your personal e-mail address or any of your private information. The information obtained from the tracking of cookies is only evaluated as a whole. The log files of the web server are also used to count visitors and evaluate the technical capabilities of our site in order to facilitate navigation on the site and to make its pages more useful to users. We collect information on site traffic, but not on individual visitors .

2. session cookies are strictly necessary to provide you with the

services available through our website and to use some of its features.

Since these cookies are strictly necessary, it is not possible to refuse them without affecting the functioning of our website, but you can block or delete them by changing your browser settings and forcing the blocking of all cookies on this website .

- 3. Google Analytics cookies collect information that is used in aggregate form to help us understand how our website is used or the effectiveness of our marketing campaigns or to help us customize the site in order to improve your experience.
- **4. profiling cookies** create user profiles and are used to send advertising messages in line with the preferences expressed by the user while browsing the web:
 - a. The cookies collected for the purposes listed above can be communicated to the competent subjects in charge of managing the site for the performance, even partial, of the activities related to the assignment.
 - b. For all cookies other than technical cookies, the user's express consent is required the first time they visit the site. The consent is tracked in subsequent visits, however the user always has the possibility to revoke the consent already expressed in whole or in part.

6.2. DURATION

Some cookies (session cookies) remain active only until the browser is closed. Other cookies (persistent cookies) "survive" when the browser is closed and are also available in subsequent visits by the user and their duration is set by the server at the time of their creation with a predetermined expiration date.

The setting can be defined specifically for different websites and web applications. In addition, the most common browsers allow you to define different settings for various types of cookies.

You can set your browser to notify you in case of attempts to insert cookies, restriction or complete refusal.

7. RIGHTS OF THE INTERESTED PARTY

The interested party will be able to assert his rights, as foreseen by the articles. 15-23 GDPR in particular:

- Request a copy of the information we have in our possession;
- Correct and update their information;
- Withdraw consent;
- Right to object and to request the deletion of data or the limitation of use, where there are no legitimate reasons to continue to use and process your information and / or in the absence of consent to direct marketing activities;
- Right to data portability;
- Right to lodge a complaint with the competent supervisory authority (Privacy Guarantor).

You can exercise the above rights and / or manage the information by contacting us at the following references:

Post office: Via Alla Parrocchia n. 10 - 22017 Menaggio (CO)

Email: acboat@hotmail.it

In the event of a request for access or information, we inform you that, if the request is unfounded or excessive, we can charge a fee or refuse to act.

8. CHANGES TO THIS PRIVACY POLICY

AC BOAT di Bolgiani Maria Cristina reserves the right to modify the content, in part or completely, also due to regulatory updates. The updated version of this Notice will be published on the website, therefore we invite you to visit this section regularly.