

# RCF WEBSITE DATA PRIVACY POLICY

## Protection of Privacy

RCF S.p.a. with registered office in Via Raffaello Sanzio 12, Reggio Emilia, Italy is the Data Controller for the personal data collected on this site pursuant to EU Regulation 679/2016 (GDPR). This Privacy Information is up to date as of **25/05/2018**.

## Personal Data and Browsing Data

In accordance with the commitment and care that RCF S.p.a. dedicates to the protection of personal data, we write to advise you of the methods, purposes and area of communication and distribution of your personal data and your rights, in compliance with art. 13 of the GDPR.

### 1. CATEGORIES OF PERSONAL DATA PROCESSED BY THE DATA CONTROLLER

In order to offer you the services envisaged by its own websites, RCF S.p.a. (hereinafter RCF), in its capacity as Data Controller, must process some personal data necessary for the provision of the services.

This data may be provided implicitly by the tools that you use to access and make use of the services or may be explicitly provided by you.

RCF may process the following categories of users' personal data:

- **technical browsing data** concerning the IP address, the identifying codes of the devices with which the user makes use of the site or services, the characteristics of the browser and the times of access, the addresses of the resources requested in URL format, 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 response given by the server and other parameters relating to the operating system and the software environment of the user;
- **browsing data intended for profiling** provided indirectly through the use of the service itself and obtained and analysed subject to the consent of the user;
- **common identification data** provided by the user (e.g. forename, surname, e-mail, telephone number, profession, interests, etc.) in order to make use of the products and services;

## **2. PURPOSES AND LEGAL BASES OF PROCESSING**

The data and cookies received from you will be processed by RCF solely with methods and procedures necessary to provide you with the requested services and for the further purposes for which you have expressed consent.

Only with your express consent, the data may be used to perform statistical analysis, market research, promotional activity through social media and delivery of commercial information on products and promotional initiatives from RCF. (**Direct marketing purpose**)

Again with your consent, the data may be used for the purpose of automatic profiling by collecting information on your browsing during access and use of the services and, through statistical correlation algorithms, they are linked to the same information from other users to identify common traits and group similar ones within interest classes. By assigning your browser to an interest class our systems will subsequently be able to offer you content more in line with your tastes and it will feature advertising contributions that better meet your needs and better direct the interest of advertisers, reducing the level of disturbance in use.

As of the date on which you read this Information, RCF uses the profiling data to aggregate marketing profiles and to assist sales management in the development of digital strategies (**Profiling purpose**)

Communications for market research or of commercial information on products and promotional initiatives may be made through newsletters, e-mail and specific initiatives through social networks attributable to RCF.

We hereby inform you that some activities may be carried out through suppliers, specifically appointed as Data Processors, including suppliers residing outside the European Union.

The legal bases for the purposes described previously are the fulfilment of a request from you as a data subject and the consents that you have expressed.

## **3. DISTRIBUTION, COMMUNICATION AND PARTIES WHO ACCESS THE DATA**

Your personal data will not be distributed, but they may be communicated where necessary for the provision of the service to third parties (such as third-party technical service providers, mail couriers, hosting providers, IT companies) appointed, as necessary, as Data Processors by RCF for tasks of a technical or

organisational nature instrumental to the provision of services.

Access to the data is also permitted to categories of RCF appointed staff involved in the organisation for data processing (administrative, sales, marketing, customer service staff, system administrators).

The up-to-date list of Processors may always be requested from the Data Controller.

The right to communicate to third parties remains should you have freely and specifically consented.

#### **4. TRANSFER OF DATA ABROAD**

Your personal data will be processed by RCF within the European Union.

Should it become necessary for reasons of a technical and/or operational nature to engage parties located outside the European Union, or should it be necessary to transfer some of the data collected to technical systems and services located outside the area of the European Union, the processing will be governed in accordance with the provisions of chapter 5 of the Regulation and authorised in accordance with specific decisions of the European Union. All necessary precautions will therefore be adopted to guarantee the most comprehensive protection of personal data, basing this transfer: a) on adequacy decisions concerning the receiving countries outside the EU expressed by the European Commission; b) on adequate safeguards expressed by the third-party recipient in accordance with art. 46 of the Regulation; c) on the adoption of binding corporate rules (BCRs).

#### **5. DURATION OF PROCESSING AND RETENTION OF PERSONAL DATA**

In accordance with Art. 5.1 e) of the GDPR, RCF will process the data that you provide for a period of time not exceeding the performance of the purposes for which they are processed and in any case for the entire duration of the performance of the services requested.

#### **6. RIGHTS OF THE DATA SUBJECT**

RCF guarantees that you can exercise the rights envisaged by art. 12 of the GDPR at any time. In particular, you have the right:

- to know whether the Controller holds and/or processes personal data concerning your person and to access it in its entirety, also obtaining a copy of it (art. 15 **Right to access**);
- to rectification of imprecise personal data or to completion of incomplete personal data (Art. 16 **Right to rectification**);
- to deletion of the personal data held by the Controller should one of the grounds envisaged by the GDPR apply (**Right to Deletion**, 17);
- to ask the Controller to limit the processing only to certain personal data, should one of the grounds envisaged by the Regulation apply (Art. 18 **Right to limitation of processing**);
- to request and receive all your personal data processed by the controller, in a structured, commonly used and machine-readable format, or request transmission to another controller without hindrance (Art. 20, **Right to portability**);
- to object entirely or in part to the processing of data for the purpose of sending advertising material and market research (Consent) (art. 21 **Right to object**)
- to object entirely or in part to the automatic or semi-automatic processing of data for profiling purposes (Consent) (art. 21 **Right to object**).

These rights may be exercised through communication with the Data Controller, the contact details of which are indicated in the dedicated section of this information. You also always have the right to lodge a complaint with the Italian Data Protection Authority, which can be contacted at the address [garante@gpdp.it](mailto:garante@gpdp.it) or through the site <http://www.gpdp.it>.

## 7. PRIVACY SERVICE

RCF has established a service for managing requests concerning privacy.

To exercise the rights that you are guaranteed, you may use the following contact details:

- servizio Privacy c/o RCF S.p.a.- Via Raffaello Sanzio 13, 42124 Reggio Emilia, Italy
- or by sending an e-mail to: [privacy@rcf.it](mailto:privacy@rcf.it)

## 9. LATEST UPDATE

This Privacy Information is up to date as of **25/05/2018**.