

OrtoRomi Società Cooperativa Agricola, with registered office at via Piovega 55, Borgoricco (PD), Italia (“OrtoRomi”) is committed to protecting your privacy.

This privacy policy (“Privacy Policy”) applies to www.ortoromi.it web site (“Website”) and describes all personal data processing activities fulfilled by OrtoRomi with the Website, which is its own property. OrtoRomi processes your personal data when you visit the Website and uses its services and functionalities on the Website.

This Privacy Policy has been prepared in accordance with Recommendation 2/2001, adopted in May 17 2001, by the Working Group for the Protection of Personal Information and it represents also informative to the concerned ones as per Art. 13 of the Legislative Decree of 30 June 2003, No 196 and subsequent amendments and additions (“Privacy Code”).

This Privacy Policy specifies the identity of the holder of the treatment that controls and manages the personal data collected and processed through the Website, identifies the personal information collected and the purposes, methods of treatment, the scope of disclosure to third parties, the security measures to protect and safeguard your personal information and the manner in which the user can check the processing of data relating to him and exercise the rights conferred by the Privacy Code.

The holder of the treatment

The holder of the treatment is OrtoRomi Società Cooperativa Agricola, with registered office in Via Piovega 55, Borgoricco (PD) and may be contacted at +39 049 7480700 or at info@ortoromi.it.

What kind of data are processed

The simple visit or consultation of the Website do not involve into the collection and the processing of personal data, with exception of the so-called navigation data, whose transmission to the Website is implicit in the functioning of the information systems in charge of the managing of the Website and in the use of communications protocols peculiar to the Internet.

This category includes, for example, the IP addresses of the device employed by the user to visit the Website and the average time spent on the Website for statistics purposes only and anonymously for the sole purpose of controlling the Website and improving the functionalities.

It concerns information that is not collected to be associated with specific individual, but by their own very nature, through the processing and association with data held by third parties, allowing users to be identified;

The navigation data are deleted immediately after processing in anonymous form and may be used by OrtoRomi for purposes of assessing possible responsibilities in case of information crimes realized against the Website or through the Website. With the exception of the aforementioned circumstance, the navigation data described before are stored only temporarily, in compliance with the applicable legislation.

Furthermore, OrtoRomi collects and processes personal data voluntarily provided by the user when the user interacts with the functionalities of the Website and requests the services offered by the Website, for example upon the user’s subscription to the newsletter or mailing list and the user requests information through the “Contacts” section.

Personal data that OrtoRomi collects and processes includes name and contact details such as email address. Other information may be provided on an optional basis.

In the relevant section of the Website where data is collected a specific information statement (Art. 13 of Privacy Code) is provided. When requested under the Privacy Law, OrtoRomi requires the user’s consent before proceeding his/her personal data.

What are the purposes of the data processing

We will process your personal data to manage your interaction with the Website and its functionalities. Furthermore we manage your data in order to fulfil the obligations as by law, regulations and community rules, and in order to exercise rights in court proceedings. The collected data may be used to update or correct previously collected ones.

Providing your personal data in order to manage your interaction with the Website, your requests of information and/or your subscription to the newsletter service as described before, is required. Failure to provide the data will make it impossible to perform our contractual obligations and/or provide requested services and information.

With your consent, that is free and optional, OrtoRomi may also process user's personal data for marketing purposes, notably to send to user, also through newsletter, e-mails, sms and mms, information and updates on our products, offers, promotional campaigns and on events and similar initiatives organized by OrtoRomi or to which OrtoRomi takes part to, including possible invitations to said events.

Communicate your data for marketing purposes, as specified here above is optional and a refusal will not affect the provision of services and requested information.

In terms of marketing activities carried on via e-mails, your prior consent will not be necessary if you already provided your e-mail addresses in the context of sale of similar product or service and if you have not initially refused such use or in subsequent submissions.

In any case, we hereby state that it is always possible to oppose, free of charge, to the delivery of promotional e-mails, during the registration phase or later by sending an e-mail to the following address: press@ortoromi.it.

Furthermore, you can choose the preferred communication method (as for example: e-mails, SMS or other) and you may oppose yourself to the later e-mails with the specific links contained in the communication that you will receive by e-mails.

Your personal data shall be processed in compliance with requirements and necessary measures provided by the Privacy Code and by Authority for Privacy and are kept only for a period of time according to applicable laws.

How the data are processed – security of data

OrtoRomi collects and processes personal data via electronic and manual means functional to the abovementioned purposes. OrtoRomi is committed to ensuring the security of your personal data and respects the provisions of applicable laws in order to prevent loss of data, illegal and improper use and unauthorized access, with particular reference to attachment B of the Privacy Code (Technical discipline for minimum security measures).

Systems and softwares are configured in order to reduce to a minimum the use of personal data, which are in any case used only if necessary to the achievement of specific purposes.

The collected data are guarded and filed on a server of OrtoRomi, that shall take protection measures against the risk of unauthorized intrusion and access. OrtoRomi also adopts suitable safety measures to guarantee the integrity and the availability of the data as well as the protection of the areas and the locals which are relevant for their custody and accessibility.

Our Cookie policy

The Website uses cookies. Cookies are small data files stored on your devices as you visit the Website or part of it, in order to offer to users an easier surfing on the Website. For example, cookies may help OrtoRomi to: (i) understand your preferences regarding the surfing through the Website, to facilitate and optimize the operation of the Website, (ii) analyse and monitor the performance, the operation and efficacy of the Website, in order to improve and optimize it.

The cookies used by the Website cannot be used to run programs on the user's device or to download viruses on it, and they do not allow the Website any kind of control on the user's device. The Website do

not use cookies to access information stored on the user's device, to store information on the same and to monitor user's operation.

OrtoRomi may allow technical and commercial partners to place cookies on your devices as you visit the Website.

For example OrtoRomi uses Google Analytics system for its web analytics services therefore Google could place, in this context, cookies on your devices, in order to memorize data on them or to monitor their activities.

This statement will apply to the processing by OrtoRomi of the information received by the cookies.

Most browsers automatically accept cookies by default, but you can usually modify your browser setting to refuse cookies or selectively accept cookies.

The section usually called "Options" or "Preferences" on your browser's menu prevent the risk of receiving cookies and other technologies employed to track users and explain how to obtain from browser notice of receipt of these referenced technologies or how to disable them completely.

As an alternative it is possible to visit the "Help" section of the toolbar placed on the majority of browsers and visit reference website such as Internet Explorer, Chrome, Safari, Firefox, Opera. From your mobile device: Android, Safari, Windows Phone, Blackberry etc.

Disabling the cookies may limit the possibility to use the Website and may prevent the user from fully benefit the functionalities and services of the Website. In order to decide which cookies should be accepted or refused, here a description of different kind of cookies used on the Website.

- **First party cookies:** First party cookies are set by the website you are visiting and they belong to the same domain that is shown in the browser's address bar.
- **Third party cookies:** Third party cookies belong to domains different from the one shown in the address bar. If a user visit a website and different company sends the information through the website, that is a third party cookie.
- **Session cookies:** These cookies are temporary and deleted after you close down your navigation window.
- **Persistent cookies:** Persistent cookies outlast user sessions and store sign-in details and passwords. Can be used for many purposes, as for example to remember your preferences or your choice through the Website.
- **Essential cookies:** These cookies are strictly necessary as without them OrtoRomi cannot provide many services that you need on the Website. For example, essential cookies help keep you securely logged in between protected areas of a website. These cookies do not collect information for marketing purposes and cannot be deactivated.
- **Functional cookies:** These cookies allow a website to remember when a user return to visit it. They allow to customize the contents and remember any preferences the user have made and improve his/her online experience. These cookies do not collect information in order to trace the user. All information are anonymous.

More specifically, the following is a list of the cookies used in the Website and their description and functionalities, including the relative duration.

Cookies typology	Name	Origin	Purpose	Duration
First party – functional	PHPSESSID	OrtoRomi	Recovery Account Settings (save the user's session and record the settings, for example accessibility settings)	Persistent cookie
First party – functional	raindrop_locale	OrtoRomi	Conservation of place of origin of connection to the Website and language preferences	Persistent cookie (345 days)

Third party - functional	_utma _utmb _utmc _utmz	Google Analytics	Collect anonymous information on how the users surf the Website; compiling reports in order to improve the Website; collect the number of visitors of the Website, identify the origin of the visitors and the section visited. More information are available here: https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage	Persistent cookie
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To which subjects OrtoRomi may communicate personal data

The data will be accessible to personnel within our Company environment, specifically to the people that need to access it for their duties regarding the purpose of data handling specified above, to those in charge of the handling and to data processors, if named. The complete list of Data processors identified by the Company and of the subjects whose data has been communicated is freely available by request to OrtoRomi.

The data may be communicated to independent or associated collaborators, third parties that carry out technical and organisational services, and to anybody who is a legitimate receiver of communication foreseen by law.

These subjects will handle the data in their capacities as data dontrrollers, data processors in charge of the handling, depending on the circumstances, exclusively for the purpose of the handling specified above. It is understood that the data will not under any circumstances be communicated to third parties to be used for their own promotional purposes and will not be disclosed freely. OrtoRomi informs you that in any moment you may exercise your rights in accordance with article 7 of the Privacy Code including, as examples, the right to obtain confirmation of the existence of Data, check the contents, source and correctness, request integration, revision, rectification, destruction, transformation in an anonymous form, or a block following a violation of the law; you may moreover oppose the Data handling for legitimate reasons. To exercise these rights please contact the responsible for data processing as identified in the first part of the Privacy Police.