

## COOKIE POLICY

This document contains information about the technologies that enable this Website to achieve the purposes described below. These technologies allow the Data Controller to collect and store information (e.g. through the use of Cookies) or to use resources (e.g. by running a script) on the User's device when the User interacts with this Website.

For the sake of simplicity, these technologies are briefly referred to in this document as 'Tracking Tools', unless there is reason to differentiate.

PODERE ROCCHES DEI MANZONI DI VALENTINO S.A.S. DI MIGLIORINI RODOLFO & C. uses cookies for a number of purposes, for example:

- allow you to access and use the <https://www.rocchedeimanzoni.it/> or <https://www.rocchedeimanzoni.it/visita/> or <https://www.shop.rocchedeimanzoni.it/> platform and avail yourself of booking and purchasing services through them;
- to understand your browsing and interaction patterns and make appropriate improvements;
- to propose customised advertising (e.g. on the platform, in e-mails and on third-party websites);
- to display more relevant content (e.g. advertising);
- to monitor and analyse the performances, operation and effectiveness of the platform and advertising;
- to comply with legal agreements governing the use of the platform;
- to detect and prevent fraud, ensure reliability and security, and for investigation purposes;
- for customer support, data analysis, research, product development and regulatory compliance purposes.

Cookies are small strings of text – which may include personal data (e.g. IP address, Username, email address) and technical information (e.g. language settings, device type) – that websites which are visited send to the User's terminal device (personal computer or mobile device such as a tablet or smartphone), where they are stored (e.g. in the browser's memory), and then transmitted back to the same websites on the next visit. Cookies are used to perform functions such as computer authentication, session monitoring and storing information on websites (without the use of Cookies some operations would be very complex or impossible to perform), also with regard to identifying preferences based on browsing experience. When browsing a Website, the User may also receive on his/her terminal device Cookies that are managed and sent by different websites or web servers (so-called 'third parties'), on which certain elements (such as, for example, images, maps, sounds, specific links to web pages of other domains) present on the Website which the User is visiting.

There are also other tracking tools (e.g. the so-called 'Fingerprinting', 'Pixel Tag', 'Plugin') which, although they use a different technology, enable similar processing to that carried out by means of Cookies and achieve the same results. These tools, unlike Cookies, do not store information inside the User's device and cannot be removed directly by the User himself/herself via the browser settings; it is therefore necessary for the User to avail himself/herself of the option to revoke the authorisation to use them via the functions made available on the Website by the Data Controller in order to review his/her choices.

It is possible to classify these tools by:

- Type of tool
  - Cookies (active identifiers)
  - Other tracking tools (passive identifiers)
- Origin
  - First Party (or 'Publisher', i.e. the operator of the Website that the User is visiting) are installed directly by the website which he/she is visiting
  - Third Party (operator of a different website that installs Cookies via the First Party's website) are installed by a domain other than the one that the User is visiting, for example where the website incorporates elements originating from other websites, such as images, social media plugins or advertising

- Duration
  - Session (temporary, they are deleted when the browser is closed or, in the cases provided, when the logout command is performed)
  - Permanent (they remain active until their expiry date or deletion by the User)
- Purposes pursued
  - Technical purposes (relating to the functioning of the Website)
  - Non-technical purposes (such as User browser profile)

The Website of PODERE ROCCHE DEI MANZONI DI VALENTINO S.A.S. DI MIGLIORINI RODOLFO & C. uses the following cookies:

### **TECHNICAL COOKIES**

Technical cookies are necessary for the functioning of the website because they enable functions to facilitate the user's browsing. For example, thanks to said cookies the user will be able to access his/her profile without having to log in each time or will be able to select the language with which he/she wishes to browse the website without having to set it each time.

Technical cookies are considered strictly necessary, because it is essential to save information in order to provide a service requested by the user. Therefore, technical cookies cannot be disabled and users' prior consent is not required for their installation.

Session and persistent cookies are included in the Technical Cookies category.

The User's prior consent is not required for the installation of Technical Cookies.

Please be aware that you can block Cookies at any time through your browser settings; however, if you set your device to refuse these Cookies, some services of the Website may not be displayed correctly or function properly, particularly, without Technical Cookies, processes that allow the User to be identified and remain identified during the session may be more complex to perform and less secure.

### **NON-TECHNICAL COOKIES**

These are tools used to trace specific, recurring behaviour or activities in the use of the Website's functions back to specific individuals, so as to associate the different profiles to uniform groupings, in order to optimise and customise the services offered and/or send advertising messages in line with the preferences expressed by the User when browsing online. This also includes all further Cookies and other tracking identifiers that do not fall within the scope of the technical function.

These are persistent Cookies, as they stay active until their expiry date or deletion by the User. We also inform you that these Cookies are owned and also operated by Third Parties: they can only be used with your prior consent; your preference is tracked by a specific Technical Cookie.

In this grouping we mainly use on our Website:

### **PROFILING AND MARKETING COOKIES**

Profiling cookies, which may be either first-party or third-party, are used to track the user's browsing, analyse his/her behaviour for marketing purposes and create profiles based on his/her tastes, habits, choices, etc. In this way it is possible, for example, to transmit targeted advertising messages in relation to the user's interests and in line with the preferences expressed by the user when browsing online. These cookies also include social media cookies.

Such cookies can only be installed on the user's terminal device if the user has given his/her consent.

### **SOCIAL MEDIA COOKIES**

These are Cookies managed by Social Media Networks, such as Third Parties, as a result of the use by our Website of the so-called 'Social Media Plugins', integrated into the Website itself. These tools allow for the sharing of the content of the Website visited with other users; they are Cookies which are characteristically used to enable functions such as 'Like' buttons that are typical of Social Media Networks.

These Cookies also allow Social Media Networks to identify Users and collect information from them even while they are browsing other Websites; they may also be used by Social Media Networks for

additional purposes such as targeted advertising, analytics or market research. The privacy policies of the respective Social Media Networks apply solely to such processing. You should therefore consider the above before giving your consent for the use of Third-Party Cookies in order not to allow your personal data to be transmitted to Social Media Networks.

## **ANALYTICS COOKIES**

Analytics Cookies, which may be first-party or third party, are installed for the purposes of collecting information on the use of the website. In particular, they are useful to statistically analyse accesses or visits to such website and to enable the website owner to improve its structure, browsing logic and content. The information collected (including the IP address, which is masked) is used for statistical analysis in order to improve the use of the website and possibly to make the content more interesting and relevant to the user's requirements by adopting technical security measures that comply with the guarantee requirements for the transfer of data to the United States.

Analytics Cookies are not necessary for the functioning of the website, however, since the IP address is not in plain text, the installation of such cookies does not require the user's consent.

Analytics Cookies can be assimilated to technical cookies if they are used for the purpose of optimising the website directly by the website owner, which may collect statistical information in aggregate form on the number of users and how they visit the website.

If, on the other hand, the processing of such statistical analyses is entrusted to third parties, the users' data must be minimised in advance and may not be combined with other processing or transmitted to other third parties. Under these conditions, the same rules on disclosure and consent apply to analytics Cookies as to technical Cookies.

## **MANAGING PREFERENCES**

When first accessing any page of the Website, a banner is displayed containing:

- brief information,
- a button through which the user can accept all Cookies,
- a button by means of which it is possible to refuse the installation of Cookies, with the exception of technical cookies; a button ('more options') allowing access to a dashboard through which you can select the individual types of Cookies to be installed.

Consent to the use of Cookies is recorded with a special 'Technical Cookie'.

You will be able at any time to amend or revoke any consent provided by pressing the round button "Cookie Settings" at the bottom of every page of the aforesaid website and expressing your updated preferences.

In any event, you can also express your Cookies preferences through the settings of the browser used.

Disabling or blocking Cookies or deleting them may affect the optimal use of certain areas of the website or prevent certain functions from working, as well as affect the operation of third-party services.

The configuration of Cookie management depends on the browser used.

Below are instructions and links to guides for managing cookies for the main desktop browsers:

- Microsoft Edge: link to more information:

<https://support.microsoft.com/it-it/help/4027947/microsoft-edgededelete-cookies> -

Google Chrome: link for further information:

[https://support.google.com/chrome/answer/95647?hl=it&p=cpn\\_cookies%20https://support.google.com/accounts/answer/61416?hl=it](https://support.google.com/chrome/answer/95647?hl=it&p=cpn_cookies%20https://support.google.com/accounts/answer/61416?hl=it)

- Mozilla Firefox: link for further information:

<https://support.mozilla.org/it/kb/Attivare%20e%20disattivare%20i%20cookie>

- Apple Safari: link for further information: <https://support.apple.com/it-it/guide/safari/sfri11471/mac>

- Opera: link for further information:

<https://help.opera.com/en/latest/web-preferences/#cookies> Booking.com:  
[https://www.booking.com/content/terms.it.html?aid=397594&label=gog235jc-1DCAEoggl46AdIFFgDaHGIAQGYARS4AQfIAQzYAQPoAQH4AQKIAgGoAgO4AunkjpcGwAIB0glkZTUyNTYwNzltYzBINS00YWlxLTg3NjltMmYxNTkxNWQ5ZWQy2AIE4AIB&sid=9e718293a9be60c5e9ef28f49590eb0f#tcs\\_previous\\_terms\\_section](https://www.booking.com/content/terms.it.html?aid=397594&label=gog235jc-1DCAEoggl46AdIFFgDaHGIAQGYARS4AQfIAQzYAQPoAQH4AQKIAgGoAgO4AunkjpcGwAIB0glkZTUyNTYwNzltYzBINS00YWlxLTg3NjltMmYxNTkxNWQ5ZWQy2AIE4AIB&sid=9e718293a9be60c5e9ef28f49590eb0f#tcs_previous_terms_section)

For browsers other than those listed above, you should consult the relevant guide to find out how to manage cookies.

For some processing purposes (e.g. to receive our newsletter, to use our services or to allow you to browse our website) it is necessary for you to provide your data, without which we cannot provide you with our services. For other purposes (e.g. for profiling purposes) we may only process your data with your consent.

Browsing data is processed by PODERE ROCCHE DEI MANZONI DI VALENTINO S.A.S. DI MIGLIORINI RODOLFO & C. at the same time as browsing by means of the installation of technical Cookies and first-party analytics Cookies: this data is necessary to ensure correct browsing within the website.

However, the provision of consent to the installation of profiling cookies is entirely optional. Your personal data will be processed by these Cookies only with your free, specific and express consent, provided in the manner described above.

The data may be processed by external persons acting as data controllers such as, by way of example, supervisory and control authorities and bodies and, in general, by parties, including private parties, entitled to request the data, Public Authorities that expressly request the data from PODERE ROCCHE DEI MANZONI DI VALENTINO S.A.S. DI MIGLIORINI RODOLFO & C. for administrative or institutional purposes, in accordance with the provisions of the applicable national and EU regulations, as well as persons, companies, associations or professional firms providing assistance and consultancy services.

The data may also be processed on behalf of PODERE ROCCHE DEI MANZONI DI VALENTINO S.A.S. DI MIGLIORINI RODOLFO & C by external persons appointed as data processors, who are given appropriate operating instructions.

These persons essentially fall into the following categories:

- (a) companies providing maintenance services for the website and IT systems;
- (b) companies offering support in carrying out market studies;
- (c) companies that perform database management and maintenance services for PODERE ROCCHE DEI MANZONI DI VALENTINO S.A.S. DI MIGLIORINI RODOLFO & C,
- (d) companies that provide management services for the automation marketing platform.

Your personal data may be processed, with your explicit consent, by third parties to which the data is communicated.

Personal data shall not be disclosed.

Data collected using Cookies may be transferred to countries outside the European Union whose level of data protection has been deemed adequate by the European Commission pursuant to Article 45 of the GDPR.

Furthermore, personal data may be transferred abroad to non-European countries, and in particular to the United States (by way of example, Google, HubSpot, Social Media Network), subject to the Standard Contractual Clauses adopted/approved by the European Commission pursuant to Article 46(2)(c) and (d)

A copy of the guarantees adopted can be obtained by sending an e-mail to the following address: [m.trossarello@rocchedeimanzoni.it](mailto:m.trossarello@rocchedeimanzoni.it)

Data collected using all other cookies shall not be further disclosed.

## **SOCIAL MEDIA NETWORK PLUGIN**

The Website also incorporates plugins and buttons to enable easy sharing of content on your favourite social media networks. When you visit a page on our Website that contains a plugin, your

browser connects directly to the server of the social media network from where the plugin is loaded, which server can track your visit to our Website and, where appropriate, associate it with your social media network account, particularly if you are logged in at the time of your visit or if you have recently browsed one of the websites containing social plugins. If you do not wish the social media network to record data relating to your visit to our Website, you must log out of your social media network account and probably delete the cookies that the social network has installed in your browser. Plugins with advanced privacy protection functions for Users are installed on this Website, which do not send cookies or access cookies on the User's browser when the page is opened, but only after the plugin is clicked.

The collection and use of information by such third parties is governed by their respective privacy policies to which reference should be made:

- [Facebook \(cookie information link\)](#) -  
Instagram

## **RIGHTS OF THE DATA SUBJECT**

Pursuant to Article 15-22 of the Regulation, the following rights may be exercised, where applicable:

- Right of access to data, by making an appropriate request for the following information: purposes and methods of processing; categories of personal data in question; recipients or categories of recipients to whom the personal data have been or will be disclosed; period for which the data will be stored; logic applied to processing; identity and contact details of the data controller and data processors;
- Right to object to its processing;
- Right to rectification of personal data, including the right to have his/her incomplete personal data completed or amended;
- Right of erasure of data or restriction of processing, subject to all retention obligations imposed by law;
- Right to data portability;
- Right to lodge a complaint with the competent Supervisory Authority in the Member State where they habitually reside or work or in the State where the alleged infringement occurred.

## **RETENTION PERIOD**

Cookies shall be retained for as long as necessary in order to pursue the purposes for which they were collected, and in any case for thirty days after their completion.

## **DATA CONTROLLER**

PODERE ROCCHES DEI MANZONI DI VALENTINO S.A.S. DI MIGLIORINI RODOLFO & C Località  
Manzoni Soprani N.3  
12065 MONFORTE D'ALBA (CN)

E-mail address of the Data Controller: [rodolfo@rocchedeimanzoni.it](mailto:rodolfo@rocchedeimanzoni.it)

Since the use of Third-Party Tracking Tools on this Website cannot be fully controlled by the Data Controller, any specific reference to Third-Party Tracking Tools is to be regarded as purely indicative. For full information, Users are kindly invited to consult the privacy policy of the respective third-party services listed in this document.

In view of the objective complexity of identifying tracking technologies, Users are invited to contact the Data Controller should they wish to receive further information on the use of such technologies on this Website.