

“PEMBERTON.IT” PRIVACY POLICY

I - INFORMATION ON THE SITE PRIVACY POLICY

1. This section contains information on the management methods of pemberton.it with reference to the processing of user data.

2. This information is also valid for the purposes of Article 13 of EU Regulation no. 2016/679, concerning the protection of individuals with regard to the processing of personal data and the free circulation of such data, for those who interact with pemberton.it and can be reached at the following address corresponding to the English language home page:

https://www.pemberton.it/en_01_main.html

3. The information is provided only for pemberton.it and not for other websites that may be consulted by the user via links contained therein.

4. The purpose of this document is to provide information about the methods, timing and nature of the information that data controllers must provide to users when connecting to the web pages of pemberton.it , regardless of the purpose of the connection itself, according to Italian and European legislation.

5. The information may undergo changes due to the introduction of new regulations in this regard, therefore the user is invited to periodically check this page.

6. If the user is under 14, pursuant to article 8, regulation 1 of the EU regulation 2016/679, and of the Art. 2 - Quinquies of Legislative Decree 196/2003, as amended by Legislative Decree 181/18, must legitimize its consent through the authorization of parents or guardians.

II - DATA PROCESSING

1 - Data Holder

1. The data controller is the natural or legal person, public authority, service or other body which, individually or together with others, determines the purposes and means of processing personal data. It also deals with security profiles.

2. With regards to this website, the data controller is: Niccolò Mario Pemberton , and for any clarification or exercise of the user's rights, he can be contacted at the following email address: niccolo@pemberton.it .

2 - Data processing manager

1. The controller is the natural or legal person, public authority, service or other body that processes personal data on behalf of the data controller.

2. Pursuant to article 28 of EU regulation no. 2016/679, upon appointment of the data holder, the person responsible of data processing for pemberton.it is: still Niccolò Mario Pemberton .

3 - Data processing location

1. The processing of data generated by the use of pemberton.it takes place at Via Giacomo Leopardi 16, 63824 Altidona (FM) .

2. In case of need, the data connected to the newsletter service can be processed by the data controller or subjects appointed by it for this purpose at the relative site.

III - DATA PROCESSED

1 - Data processing mode

1. Like all websites, this site also uses log files in which information is collected and stored automatically during user visits. The information collected may be as follows:

- internet protocol address (IP);
- browser type and device parameters used to connect to the site;
- name of the internet service provider (ISP);
- date and time of visit;
- web page of the visitor's origin (referral) and exit;
- possibly the number of clicks.

2. The aforementioned information is processed in an automated manner and collected in an exclusively aggregated form in order to verify the correct functioning of the site, and for security reasons. This information will be processed based on the legitimate interests of the owner.

3. For security purposes (anti-spam filters, firewalls, virus detection), automatically recorded data may also include personal data such as the IP address, which could be used, in compliance with the laws in force on the subject, in order to block attempts to damage the site itself or to cause damage to other users, or in any case harmful activities or offenses. This data is never used for the identification or profiling of the user, but only for the purpose of protecting the site and its users, such information will be treated according to the legitimate interests of the owner.

4. If the site allows the insertion of comments, or in the case of specific services requested by the user, including the possibility of sending the Curriculum Vitae for a possible working relationship, the site automatically detects and records some identification data of the user, including the email address. These data are voluntarily provided by the user when requesting the service to be provided. By entering a comment or other information the user expressly accepts the privacy policy, and in particular he agrees that the contents inserted are freely disseminated also to third parties. The data received will be used exclusively for the provision of the requested service and only for the time necessary for the provision of

the service.

5. The information that users of the site will deem to make public through the services and tools made available to them, are provided by the user knowingly and voluntarily, exempting this site from any responsibility for any violations of the laws. It is up to the user to verify that they have permission to enter personal data of third parties or content protected by national and international standards.

2 - Purpose of data processing

1. The data collected by the site during its operation are used exclusively for the purposes indicated above and kept for the time strictly necessary to perform the specified activities, and in any case not beyond 1 year .

2. In any case, the data collected by the site will never be provided to third parties, for any reason, unless it is a legitimate request by the judicial authority and only in the cases provided for by law.

3. The data used for security purposes (blocking attempts to damage the site) are kept for the time strictly necessary to achieve the purpose previously indicated.

3 - Data provided by the user

1. As indicated above, the optional, explicit and voluntary sending of electronic mail to the addresses indicated on this site entails the subsequent acquisition of the sender's address, necessary to respond to requests, as well as any other personal data included in the message.

2. Specific summary information will be progressively reported or displayed on the website pages dedicated to particular services on request.

IV. USER RIGHTS

1. Article. 13, c. 2 of EU Regulation 2016/679 lists the user's rights.

2. The site pemberton.it therefore intends to inform the user about its existence:

- the right of the interested party to request the owner access to personal data (art. 15 EU Regulation), their update (art. 7, co. 3, letter . a) D.Lgs. 196/2003), the rectification (art. 16 EU Regulation), the integration (art. 7, co. 3, lett. a) D.Lgs. 196/2003) or the limitation of the treatment concerning him (art. 18 EU Regulation) or to oppose, for legitimate reasons, to their treatment (art. 21 EU Regulation), in addition to the right to data portability (art. 20 EU Regulation);

- of the right to request cancellation (art. 17 EU Regulation), transformation into anonymous form or blocking of data processed in violation of the law, including those for which it is not conservation is necessary in relation to the purposes for which the data were collected or subsequently processed (Article 7, paragraph 3, letter b) of Legislative Decree 196/2003);

- of the right to obtain the attestation that the operations of updating, rectification, integration of data, cancellation, blocking of data, transformation have been brought to knowledge, also with regard to their content, of those to whom the data have been communicated or disseminated, except in the case where such fulfillment proves impossible or involves the use of means manifestly disproportionate with respect to the protected right (art. 7, co. 3, lett. c) Legislative Decree 196/2003);

3. Requests can be addressed to the data controller, without formalities or, alternatively, using the model provided by the Guarantor for the Protection of Personal Data, or by sending an email to: niccolo @ pemberton. it

4. If the treatment is based on the art. 6, paragraph 1, lett. a) - express consent to use - or on art. 9, paragraph 2 letter. a) - express consent to the use of genetic, biometric, health-related data revealing religious or philosophical convictions or union membership, revealing racial or ethnic origin, political opinions - the user has the right to revoke consent at any time without prejudice to the lawfulness of the processing based on the consent given before the revocation.

5. Likewise, in case of violation of the law, the user has the right to lodge a complaint with the Guarantor for the Protection of Personal Data, as the authority in charge of controlling the treatment in the Italian State.

6. For a more in-depth examination of the rights that belong to you, see the articles 15 and ss. of the EU Regulation 2016/679 and the art. 7 of Legislative Decree 196/2003.

V. SECURITY DATA PROVIDED

1. This site treats users' data in a lawful and correct manner, taking appropriate security measures to prevent unauthorized access, disclosure, modification or unauthorized destruction of the data. Processing is carried out using IT and / or telematic tools, with organizational methods and logic strictly related to the purposes indicated.

2. In addition to the owner, in some cases, the categories of employees involved in the organization of the site (administrative, commercial, marketing, legal, system administrators) or external parties (such as third party technical service providers, mail carriers, hosting providers, IT companies, communication agencies).

VI. CHANGES TO THIS DOCUMENT

1. This document, published at:

pemberton.it/en_05_policy.html (pdf version: pemberton.it/en-privacy-policy.pdf)

constitutes the privacy policy of this site.

2. It may be subject to changes or updates. Users are encouraged to periodically consult this page to keep up to date with the latest legislative changes.

3. Previous versions of the document will still be available on this page.

4. The document has been updated on 19/04/2020 to comply with the relevant regulatory provisions, and in particular in compliance with EU Regulation 2016/679.

COOKIE POLICY

pemberton.it is a cookie-free website.