

## PRIVACY POLICY

*Within the meaning of art. 13 of the Regulation EU 679/2016 and of the Legislative Decree 196/2003*

The aim of the present privacy policy is describing the purpose and the modalities through which:

1. AVM S.r.l., with head office in Via Vittor Pisani 19, 20124 - Milano (MI), in the capacity of independent Data Controller ("**AVM**"), collects and processes personal data related to the user ("**User/Users**") who visits the following website <https://www.montenapoleonedistrict.it> ("**Website**");
2. The company MonteNapoleone Lounge S.r.l., with head office in 20124 – Milano (MI), Via Vittor Pisani 19, likewise in the capacity of independent Data Controller ("**MonteNapoleone Lounge**"), collects and processes personal data related to the User who registers on the Website in order to make use of the services provided under the Website Section "*Exclusive Services*";
3. The Association Montenapoleone District, with head office in Via Bigli 24 – 20121 Milano (MI), in the capacity of independent Data Controller ("**Association**"), processes personal data (i) of the data subjects who, during the events promoted by the Association or in the framework of informal contacts with people who cooperate with the Association, have provided their personal visit card and/or their contact details and/or have expressed their interest in being updated or keeping in contact with the Association and its initiatives and (ii) of the Website's Users who contact by email the Association through the Website Section "The Association and its events" in order to be updated concerning the events and initiatives of the Association.

The information included in the present privacy policy are provided within the meaning of art. 13 of the Regulation EU of 27th April 2016 n. 679 ("**Regulation**"), of the Legislative Decree 196/2003 (sc. "**Privacy Code**") and of the Provisions issued by the European Data Protection Supervisor.

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### **1. Information on the processing of personal data carried out by AVM**

AVM receives and collects information relating to Users who visit and interacts with the Website in order to perform analysis and statistics, through cookies, on the usage and on the functionality of the Website, with the aim of improving the performances and the services offered by the Website, as mentioned in more detail below.

Data provided by the User will not be spread and may be communicated, with the above-mentioned purposes, to the following categories of subjects:

- (i) people, companies or professional practises who provide assistance and consulting activities to AVM, with particular but not exclusive reference to matters related to the accounting, administrative, IT, legal, fiscal and financial field;
- (ii) subjects whose capacity of accessing data is recognized by legal provisions or authorities' orders.

These subjects shall use data in their capacity of independent data controllers pursuant with law or as data processors. The User's data may also be brought to attention of our personnel who shall process it in the capacity of people in charge of processing.

### **Data collection through Cookies**

We inform you that during the navigation on the Website, AVM collects, by means of Cookies, some personal data relating to the User, such as viewed pages, links and buttons clicked by the User, date and time of access, the IP address (s.c. "*navigation data*"). In particular, AVM collects such data, by means of cookies and similar technologies.

A cookie is a text string of reduced dimensions that the viewed websites send to the computer's browser of the User. They are stored here when this one visits a website, and then they are sent back to the same

websites during the next visit. AVM uses cookies for the functioning of the website or to improve its performances, but also to provide information concerning the Website or the User's browsing.

The Website, in particular, uses the following categories of cookies:

- *technical cookies*: these are essential to enable the User to move around the website and to use its functionalities, to store the User's choices (for ex. Language, country of origin, etc.), to distribute requests on multiple servers, to enable the User to view content and videos. Being these cookies essential for the correct functioning of the Website, they do not require the User's consent;
- *AVM's performance and analytics cookies*: they can be of two types: session cookies and persistent cookies, and their use is limited to the performance and the improvement of the website. These cookies allow to recognize, measure and track the website's visitors, enabling the improvement and the completion of the Website, for example verifying if the User is able to recover the required information easily, or identifying the aspects of major interest of the website. AVM uses these cookies to perform statistic and anonymous analysis on the browsing modalities of the website's users, on the number of viewed pages or the number of clicks made on a page during the navigation. In the field of the privacy regulation, these cookies are treated as technical cookies, hence, they do not require the user's consent;
- *Third parties' performance and analytics cookies*: AVM may also use on its website analytics and performance cookies provided by third parties, with the same above-mentioned purposes, and in particular the ones provided by Google Analytics in order to perform analysis on the browsing modalities of the website's users, on the number of views pages or the number of clicks made on a page during the navigation. AVM processes the results of such analysis only if the third party uses its cookies in connection with the browser installed on the computer or on other devices used by the User to navigate on the website. In order to activate these cookies, the User can decide to give his consent (that therefore represents the legal basis of the processing) by following the mechanism shown in the information banner concerning AVM's cookies, that they User may find on the website's homepage/landing page the moment when he accesses it. To learn how to manage performance and analytics cookies installed by Google Analytics or to refuse them, we invite you to consult our Privacy Policy and the available options on cookies at the following link <https://policies.google.com/privacy?hl=en&gl=uk>.

Finally, to learn more concerning the cookies present on the website and how to manage or disable third parties' cookies, the User can visit the website [www.youronlinechoices.com](http://www.youronlinechoices.com).

Besides being able to decide to accept or refuse the cookies used by the website in their entirety or partially, through the mechanism described in the present privacy policy, in future, if they wish so, Users will be also able to cancel from their browsers the cookies set by the website also through their browsers' settings.

Most of the navigation browsers are set to accept cookies. However, the User shall be able to set his own browser to limit the number of the accepted cookies or to block all cookies by changing the browser's settings with the following modalities:

Microsoft Internet Explorer – Click on 'Tools' icon at the top right and select 'Internet options'. Select 'Privacy' In the pop-up window. Here the user can modify the cookies settings;

Google Chrome – Click on "wrench" icon at the top right and select 'Settings'. At this point select 'Show advanced settings' and chance 'Privacy' settings;

Mozilla Firefox – Select 'Options' from the drop-down menu at the top left. Here the User can adjust the cookies settings;

Safari – Select 'Preferences' from the drop-down settings menu at the top right. Select 'Security' and here the user can adjust the cookies settings.

Anyway, please note that, if you disable the use of all cookies on the Website (including the technical ones) some functionalities will be compromised. The website [www.allaboutcookie.org](http://www.allaboutcookie.org) contains the instructions to manage cookies of the most common browsers; otherwise you can refer to the documentation enclosed to the software used on your device.

In the cases provided for under the Law, the User can exercise his rights according to articles from 15 to 22 of the Regulation and, in particular, can ask for: the access to the information related to the processing of the personal data concerning him; the correction of inaccurate or incomplete data; the deletion of data; the limitation of the processing; the receipt, in a structured, common use format, readable from an automatic device, of the personal data concerning him, the possibility to transfer his personal data to another data controller, or the direct transfer of the data from a controller to another, if technically feasible, (s.c. “*data portability*”); to object in whole or in part, for legitimate reasons, to the processing of personal data concerning him. The User can exercise such rights directly by sending a message to the following email address: [avmsrl@legalmail.it](mailto:avmsrl@legalmail.it).

If he considers that the processing of the provided data violates the regulation on personal data protection, the User shall also have the right to lodge a complaint to the Data Protection Supervisor ([www.garanteprivacy.it](http://www.garanteprivacy.it)).

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## **2. Information of the personal data processing carried out by MonteNapoleone Lounge**

MonteNapoleone Lounge collects and processes the personal data of the Users who register to the Website in order to (i) enable these ones to make use of the services offered at the Website section “*Exclusive Services*”, (ii) to protect owned and third parties rights and legitimate interests (e.g. litigation management, in case of non-compliance, claims, legal disputes, and/or transactions) and (iii) to comply with obligations established by the law, regulations or the Community legislation, or by provisions issued by competent authorities by law.

The legal basis of the processing of the Users’ personal data for the provision of services referred to in the website section “*Exclusive services*” is the acceptance and the correct execution of the service required by the User; the legal basis of the processing for litigation management, in case of non-compliance, claims, legal disputes and/or transactions is the pursuit of a legitimate interest of MonteNapoleone Lounge or third parties, that, pursuant to the evaluation performed by the same Company, shall not damage His rights; the legal basis of the processing pursuant to obligations established by the law or deriving from the competent authorities is the compliance with such obligations.

Consequently, the provision of data for the described purposes does not require the User’s consent, since this is essential to register on the Website and to make use of the required services, as well as for the above outlined connected purposes; failure to provide data will therefore imply the impossibility to receive such services. The provided data may be disclosed to people and/or societies and institutions that provide services or assistance to MonteNapoleone Lounge, for example in the accounting, administrative, IT, legal, fiscal and financial field and to other subjects whose capacity to access data is recognized by provisions of law and of secondary regulation and/or by provisions issued by authorities authorized to do so by law. These subjects will use data in quality of independent data controllers or data processors. Data may be also brought to attention of our personnel that will process it in the capacity of people in charge of the processing. Data shall be retained for the duration of the required service and at the end of the provision and use of such service, for 3 years, and then they will be stored in accordance with the terms of the ordinary limitation period indicated by the Civile Code or by specific legal provisions, for administrative purposes and/or to assert or defend a right or legitimate interest of the data Controller or third parties

We inform you that it is possible to exercise, in the cases provided for in GDPR, the rights provided for in articles 15 and following of the GDPR, and, in particular it is possible to ask: the access to information related to the processing of the own personal data; the correction of inaccurate or incomplete data; the deletion of data, the limitation of the data processing; the receipt, in a structured, common use format readable by an automatic device the own personal data and the possibility to transmit them to another

controller or to ask for the direct transmission from a controller to another, if technically feasible (s.c. “*data portability*”); to object, in full or in part, for legitimate reasons, to the processing of your personal data. Such rights may be directly exercised sending a message to the following email address: [contact@mntlounge.it](mailto:contact@mntlounge.it)

If you consider that the processing of the provided data violates the Regulation on personal data protection, you have the right to lodge a complaint to the Data Protection Supervisor ([www.garanteprivacy.it](http://www.garanteprivacy.it)).

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### **3. Information on the personal data processing carried out by Associazione MonteNapoleone District**

The Association MonteNapoleone District processes the personal data belonging to data subjects who have provided their own visit card and/or their contact details and/or have expressed their interest in being updated and staying in contact with the Association and its initiatives (*i.e.* name and surname, *job title*, e-mail address, telephone number, etc.), collected during events promoted by the Association or in the framework of informal contacts with people who cooperate with the Association, as well as personal data belonging to Users who have contacted the Association by email through the website section “*The Association and its events*” in order to be updated concerning the Association’s events and initiatives, to (i) enable these subjects to remain in contact with the Association and to be updated concerning events and/or initiatives promoted by it, also through invitations and informative communications sent by email and by post to the address they have provided (ii) any possible litigation management, in case of non-compliance, claims, legal disputes, and/or transactions, prevention of fraud and/or illegal activity, etc. and (iii) where required, the compliance with obligations laid out by the law, by regulations and by the community legislation, or by provisions issued by competent authorities by law.

The legal basis of the processing with the aim of sending informative communications to data subjects referred to in the previous point n. (i) is the pursuit of a legitimate interest of the data subjects or of the Association, that is to remain in contact with the data subjects who have expressed their interest in doing so and to provide to these ones updates and information concerning the events and the initiatives promoted by the Association, as required by these subjects; the legal basis of the processing for the purposes of managing a litigation, in case of non-compliance, claims, legal dispute and/or transactions, is the pursuit of a legitimate interest of the Association or third parties, that, pursuant to the evaluations made by this one, shall not be damaging to the rights of the data subjects. The legal basis of the processing to comply with obligations required by laws, regulations and by the Community legislation, or by provisions issued by competent authorities by law is the compliance with such obligations and provisions.

The provision of personal data of data subjects is entirely optional. However, failure to provide data will imply the impossibility to remain in contact with the Association and to be updated concerning the initiatives and events promoted by it. For the above-mentioned reasons, the processing of the data subjects’ data does not require a specific consent if the data subject has already expressed his interest towards the Association. Anyway, the data subject will always have the possibility to refuse further mailings by the Association, by simply contact it at the addresses mentioned below.

The provided data may be disclosed to people and/or societies and institutions that provide services or assistance to the Association, for example in the accounting, administrative, IT, legal, fiscal and financial field and to other subjects whose capacity to access data is recognized by provisions of law and of secondary regulation and/or by provisions issued by authorities authorized to do so by law. These subjects will use data in quality of independent data controllers or data processors. Data may be also brought to attention of our personnel that will process it in the capacity of people in charge of the processing.

Data shall be processed until the data subject decides to no longer receive information concerning the initiatives and events promoted by the Association, by sending an e-mail to [segreteria@montenapoleonedistrict.it](mailto:segreteria@montenapoleonedistrict.it) or [events@montenapoleonedistrict.it](mailto:events@montenapoleonedistrict.it) and expressing his intention; after the receipt of this communication, data will be stored in accordance with the terms of the ordinary limitation period indicated by the Civil Code or by specific legal provisions for administrative purposes and/or to assert or defend a right or a legitimate reasons of the data controller or third parties.

We inform you that it is possible to exercise, in the cases provided for in GDPR, the rights provided for in

articles 15 and following of the GDPR, and, in particular it is possible to ask: the access to information related to the processing of the own personal data; the correction of inaccurate or incomplete data; the deletion of data, the .limitation of the data processing; the reception, in a structured, common use format readable by an automatic device the own personal data and the possibility to transmit them to another controller or to ask for the direct transmission from a controller to another, if technically feasible (s.c. "*data portability*"); to object, in full or in part, for legitimate reasons, to the processing of your personal data. Such rights may be directly exercised sending a message to the one of the above-mentioned e-mail addresses.

If you consider that the processing of the provided data violates the Regulation on personal data protection, you have the right to lodge a complaint to the Data Protection Supervisor ([www.garanteprivacy.it](http://www.garanteprivacy.it)).

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The present privacy policy may be revised at any time, in clearly visible way to Users and data subjects through publication on the Website. Therefore, we invite you to check such updates on the Website. If the changes are particularly significant and/or considerably affect the rights of data subjects, the Controllers may communicate them to the data subjects with another modality (e.g. by sending an e-mail).

*Privacy policy updated on **24th October 2018***