

# PRIVACY POLICY

## Information and consent on the processing of personal data

**STELT - SOTTOCOLLE SRLS** – with registered office in Via Puccini 1940/V, Porcari (LU) P.Iva 02578070464 – in the capacity of Data Controller for the processing of your personal data, pursuant to and for the purposes of Legislative Decree 30 June 2003 no. 196 ('Code regarding the protection of personal data'), and Regulation (EU) 2016/679 (also GDPR), hereby informs you that the aforementioned law provides for the protection of persons and other subjects regarding the treatment of personal data and that this treatment will be based on principles of correctness, lawfulness, transparency and protection of your privacy and your rights.

Your personal data will be processed in accordance with the legislative provisions of the aforementioned law and the confidentiality obligations laid down therein. This Privacy Policy refers to the website

[www.steltwines.com](http://www.steltwines.com) and the related sections [steltwines.com/shop](http://steltwines.com/shop)

**Site security measures:** For the management of the site specific security measures have been adopted, aimed at guaranteeing the user's secure access and protecting the information contained in the same site from risks of loss or destruction, even accidental.

For access to the reserved part of the site, an identification code and a password are assigned to the companies that request it. these passwords are generated in such a way as not to contain references that are easily traceable to the associate, in order to avoid possible abuses. The user is required to keep his password confidential.

**Changes to this Privacy Policy:** The owner reserves the right to make changes to this Privacy Policy at any time by giving publicity to Users on this page and ensuring in any case a similar protection of Personal Data. Please therefore consult this page often, referring to the date of the last modification indicated at the bottom.

**Legal references:** this privacy statement has been prepared in fulfillment of the obligations established by Regulation (EU) 2016/679, by Art. 10 of the Directive n. 95/46 / EC, as well as the provisions of Directive 2002/58 / EC, as updated by Directive 2009/136 / EC, concerning Cookies.

**Purposes of processing:** in particular, your data will be processed for the purposes described in the following paragraphs; if related to legislative or contractual obligations it will be sufficient to read this policy, if related to other purposes, the provision of data will be optional for you, and your refusal to treatment does not compromise the continuation of the relationship or the adequacy of the treatment itself

In general, the User's data are collected to allow the Owner to provide its services, as well as for the following purposes: contacting the user, sending email messages, interaction with social networks, purposes Statistics and displaying content from external platforms .

The types of Personal Data used for each purpose are indicated in the specific sections of this document. Personal data collected through this site refer to:

1. Navigation and use data, cookies
2. Data provided voluntarily by the user

The Personal Data collected may refer both to the User and to third parties to whom the User provides the data. The User assumes the responsibility of the personal data of third parties published or shared through the site and guarantees to have the right to communicate or disseminate them by freeing the Data Controller from any liability to third parties.

For the purposes of the following processing, the Data Controller may be aware of data defined as common or particular, or sensitive or judicial pursuant to the Privacy Code, when necessary for the purposes specified below, and in particular:

- Email address;
- Telephone number,
- Photographs referred to the user,
- Billing and personal data,
- Other data voluntarily disclosed by you (for example through CV delivery).

Your particular data subject to processing are only those strictly pertinent to the obligations, tasks or purposes described above and will be treated in compliance with the indications contained in the relevant General Authorizations of the Guarantor.

# 1) Navigation data

The computer systems and software procedures used to operate this website acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols.

This is information that is not collected to be associated with identified interested parties, but which by their very nature could, through processing and association with data held by third parties, allow users to be identified. This category of data includes IP addresses or domain names of the computers used by users connecting to the site, the addresses in the Uniform Resource Identifier (URI) notation of the requested resources, the time of the request, 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 (success, error, etc.) and other parameters relating to the operating system and the user's computer environment.

These data are used for the sole purpose of obtaining anonymous statistical information on the use of the site and to check its correct functioning. The data could be used to ascertain responsibility in case of hypothetical computer crimes against the site.

## Cookie

Like practically all the websites, our website also uses some cookies. Cookies are small text files that the sites visited by the user (but also other sites or webserver) send and record on his computer (or mobile device), to be then retransmitted to the same sites (or webserver), the next visit of those, thus sending information.

Cookies are now essential tools as they allow modern sites to work best, allowing maximum customization, interaction and fluency in navigation. But they can also be used to monitor user browsing and then send advertising messages in line with those.

Cookies can be:

- Session (if they expire when the browser is closed) or permanent (they remain until the expiration of a term, even years);
- First-party or third-party (in this second case are set by a site or a webserver different from the one that the user is visiting at that time);

- Technicians (necessary, sometimes indispensable, for a complete – or better – use of the site) or profiling (designed to create a user profile, and then send advertising messages in line with the preferences expressed by the same during the previous navigation ).

The Privacy Guarantor considers technical cookies to be session cookies, functional cookies and – only under certain conditions – those of analytics; in particular the Guarantor, in the provision of 8 May 2014, specified that the latter can be assimilated to technical cookies only if used for the purpose of optimizing the site directly from the owner of the site, which will collect information in aggregate form on the number users and how they visit the site.

For more information on the types of cookies, features and how they work you can consult the websites <http://www.allaboutcookies.org>, [www.youronlinechoices.com](http://www.youronlinechoices.com), <http://cookiepedia.co.uk> and the specific Provision of the aforementioned Guarantor.

**In our site there are cookies indicated and analyzed in the appropriate Cookie Policy page.**

## **2) Data provided voluntarily by the user.**

### **Sending e-mails to the addresses indicated on the site**

The optional, explicit and voluntary sending of e-mails to the addresses indicated on this site entails the subsequent acquisition of the sender's address, necessary to respond to requests and any other personal data included in the message.

### **Subscribe to the newsletter**

The website [www.steltwines.com](http://www.steltwines.com), in the specific section, allows interested parties to send the subscription to our newsletter along with some data (such as name and surname, address and email). These data will be processed by SOTTOCOLLE SRLS for purposes related to the activities of sending commercial and event-related communications. The treatment will be carried out with IT and telematic tools with methods strictly connected to the purposes indicated above. The data will be processed until the revocation of the explicit consent and will subsequently be deleted, unless otherwise indicated by the interested party. The provision of data is optional. The data will not be disseminated and will be processed exclusively for the aforementioned purposes by specially appointed personnel. The interested party is required, after evaluation of the above, to provide us with confirmation of the acknowledgment of this information and your consent to the processing (through confirmation by email and the affixing of a flag in the appropriate space below the form collected data). The interested party at

any time can exercise, by contacting the Data Controller, the rights recognized by the current legislation regarding the protection of personal data.

### **Registration to the site or to a section of it**

The website [www.steltwines.com](http://www.steltwines.com) on the "Account" or "Login" page allows interested parties to register to receive information on products, shops or make purchases, by entering some personal data (such as name and surname, company name of the company of reference, e-mail address, personal data, personal data and invoicing). These data will be processed manually and also through the use of IT tools by the staff of SOTTOCOLLE SRLS specially appointed, exclusively to respond to the user's request. The personal data introduced in the Form are divided into two categories: mandatory and optional, as shown in the procedure for requesting registration on the site. The provision of mandatory data and the related processing for the purposes indicated above are strictly functional to the execution of the request. The other data collected serve to help SOTTOCOLLE SRLS to offer an ever better service. We point out that at any time you can exercise, directly addressing the Data Controller, the rights specified in the appropriate section called "RIGHTS OF THE INTERESTED".

Processing methods: The processing is carried out by adopting the appropriate security measures to prevent unauthorized access, disclosure, modification or destruction of Personal Data. In particular, the treatment is carried out by:

- IT tools, with organizational methods strictly related to the purposes indicated above;
- Entrusting of processing operations to third parties.

Each processing takes place in compliance with the procedures set forth in Chapter II of the Regulation (EU) 2016/679 and the articles. 11, 31 and following of Legislative Decree 196/03.

**Communication:** your data will be stored at our office and will be communicated exclusively to the competent subjects for the completion of the services necessary for a proper management of the relationship, with a guarantee of protection of the rights of the interested party.

Your data will be processed only by personnel expressly authorized by the Owner and, in particular, by the following categories of persons in charge:

- Sales Managers,
- Administrators and administrative staff.

In addition to the owner and internal staff, in some cases, they may have access to external data subjects (such as third party technical service providers, postal carriers, hosting providers, IT companies, communication agencies). Your data may be disclosed to third parties, in particular to:

- Constitutional or constitutional bodies;
- Consultants and freelancers, also in associated form;
- Anyone who is legitimate recipient of communications required by law or regulation.

**Dissemination:** the data, without prejudice to the absolute prohibition of disseminating the data suitable for revealing the state of health, may be disseminated, as described above, at:

- No diffusion expected;

**Conservation:** The treatments connected to the web services of this site take place at the company headquarters and are handled by technical staff in charge of the processing.

Your personal data will be stored in the manner indicated above, for the minimum time required by the legislative and contractual nature or until the request for cancellation by the interested party. At the time of collection, the data will be stored in the reference folders on company management and / or in paper archives. At the time of cancellation it is possible that the data are still stored but anonymous.

**Rights of interested parties:** The subjects to whom the personal data refer have the right at any time to obtain confirmation of the existence or otherwise of the same data and to know its content and origin, verify its accuracy or request its integration or updating, or correction.

**You also have the right to obtain from the holder the cancellation, communication, updating, correction, integration of personal data concerning you, as well as in general can exercise all the rights provided by Article 7 of the Privacy Code and by Chapter III of the GDPR, Articles 12 to 23, including the right to lodge a complaint with the supervisory authority.**

**Further information on the treatment:**

**Defense in court:**

The User's Personal Data may be used for the defense by the Owner of the website in court or in the stages leading to its eventual establishment, by abuses in the use of the same or related services by the User.

**Specific information:**

Specific information could be presented on the pages of the Website in relation to particular services or processing of the Data provided by the User or the Interested Party.

**Maintenance:**

The User's Personal Data may be processed with additional methods and purposes related to site maintenance.

**System Log:**

For needs related to operation and maintenance, this site and any third party services used by it may collect system logs, which are files that record the interactions – including navigation – and that may also contain personal data, such as IP address.

**Information not contained in this policy:**

More information in relation to the processing of Personal Data may be requested at any time to the Data Controller.

**Link to third-party sites:**

SOTTOCOLLE SRLS is not responsible for the processing of personal data that may be carried out by and through the sites to which this site refers via links