

**Disclosure on personal data processing**  
**(pursuant to Article 13 of Legislative Decree no. 196, of 30 June 2003)**

We inform the User or Visitor of our site that the Italian Legislative Decree no. 196/2003 (the so-called “Code on Personal Data Protection”, hereinafter also called the “Code”) provides for the protection of physical persons with regard to the processing of personal data. In accordance with the provisions of the aforesaid Code and with the current relevant laws, the processing of data shall be governed by principles of correctness, lawfulness and transparency, respecting the basic rights and freedoms, as well as the dignity of the concerned person, with special reference to the confidentiality, personal identity and right to the protection of personal data. This information is provided pursuant to art. 13 of the Code and it is subject to updates, which shall be published on our site.

**THE DATA CONTROLLER**

The data controller is **Dotweb S.r.l.** with registered offices at 50123 Firenze (FI) Via degli Orti Oricellari 8D, which, in accordance with Art. 29 of the Code, may appoint one or more Data Supervisors to work under its direct authority on the basis of the instructions they receive.

**PERSONS TO WHOM DATA MAY BE COMMUNICATED OR WHO MAY BECOME  
ACQUAINTED WITH IT IN THEIR WORKING ROLES**

The processing of personal data linked to the web services of this site takes place at the offices of Dotweb S.r.l. and of affiliated and/or subsidiary companies and/or companies belonging to the Aruba Group, and is safeguarded exclusively by the data supervision staff. The personal data provided by users who submit requests for informative and/or contact material and/or information, Internet traffic details, cookies, applications and forms are processed by the company, Dotweb S.r.l., within the context of providing the service or features requested, and will be passed on to third parties in general if necessary, including suppliers and/or employees and/or affiliated and/or subsidiary companies and/or companies belonging to the Aruba Group for the purposes described below. The processing thereof shall occur in accordance with the principles of correctness, lawfulness and transparency.

**METHOD OF DATA PROCESSING**

Personal data is processed by automated and non-automated means for the amount of time strictly necessary to accomplish the purposes for which it has been gathered. Specific security measures are observed to prevent loss of data, illegitimate or improper use and unauthorized access.

**RIGHTS OF THE PERSON CONCERNED**

The person concerned has the rights set out under Article 7 of the Italian Legislative Decree No 196 of 2003 (Right of access to personal data and other rights), as outlined below:

1. A data subject shall have the right to obtain confirmation as to whether or not personal data concerning him/her exists, regardless of it being already recorded, and communication of such data in intelligible form.
2. A data subject shall have the right to be informed
  - a) of the source of the personal data;

- b) of the purposes and methods of the processing;
- c) of the logic applied to the processing, if the latter is carried out with the help of electronic means;
- d) of the identification data concerning the data controller, data processors and the representative designated as per Section 5(2) of the Italian Legislative Decree No 196 of 2003;
- e) of the entities or categories of entity to whom or which the personal data may be communicated and who or which may become acquainted with said data in their capacity as designated representative(s) in the State's territory, data processor(s) or person(s) in charge of the processing.

### 3. A data subject shall have the right to obtain

- a) updating, rectification or, where interested therein, integration of the data;
- b) erasure, anonymization or blocking of data that has been processed unlawfully, including data whose retention is unnecessary for the purposes for which it has been collected or subsequently processed;
- c) certification to the effect that the operations as per letters a) and b) have been notified, as also related to their contents, to the entities to whom or which the data was communicated or disseminated, unless this requirement proves impossible or involves a manifestly disproportionate effort compared with the right that is to be protected.

### 4. A data subject shall have the right to object, in whole or in part,

- a) on legitimate grounds, to the processing of personal data concerning him/her, even though it is relevant to the purpose of the collection;
- b) to the processing of personal data concerning him/her, where it is carried out for the purpose of sending advertising materials or direct selling or else for the performance of market or commercial communication surveys.

## OPTIONAL NATURE OF SUPPLYING PERSONAL DATA

We inform Users that, except for browsing data, the communication of data is optional, but any refusal may not allow Dotweb S.r.l. to proceed with the supply and management of the requested services or the service forwarded by the Data Subject.

## SECURITY OF INFORMATION

All the information collected on the website is saved and stored in secure operating environments with access limited only to authorized personnel. The Website is monitored on a regular basis to check for any violation of security, and to ensure that all the collected information is safe from unauthorized viewing. Dotweb S.r.l. adopts all the security measures required by the relevant laws and regulations, and all the appropriate measures according to the latest modern standards, to ensure and guarantee the confidentiality of personal data of users, and reduce as much as possible, the dangers posed by unauthorized access, by the cancellation, loss or damage of personal data of users.

## TYPE OF DATA PROCESSED, PERIOD AND PURPOSE OF THE PROCESSING

The processing that we intend to carry out has the purpose of completing, managing and providing the requested services or the service requested by the data subject; of organizing, managing and implementing the aforementioned requests and provision of services including by communicating to third parties in general, including suppliers and/or employees and/or companies controlled by and/or connected to them for the purposes of providing the services and/or for the protection of rights and/or to fulfil legal or regulatory obligations and at the request of the competent authorities. The processing thereof shall occur in accordance with the principles of correctness, lawfulness and transparency. The data subject's personal data may be used to request information from the same, including by telephone, about the quality of the services offered, or about the termination/transfer thereof, as well as for the purposes of marketing the services in accordance with the provisions of Art. 123 of the Code, with particular reference to processing traffic data. This information may be kept for longer than the periods mentioned in Art. 123 of the Code, but in any case only for as long as is strictly necessary to achieve the purposes for which it is kept.

### DATA PROVIDED VOLUNTARILY BY USERS

The voluntary, optional and explicit sending of data to Dotweb S.r.l. by the user (for example, upon recording in its databases or upon entering his or her data by completing the specific forms, also for the purpose of checking the possibility of accessing the services provided by the same, as well as the sending of emails to the addresses indicated on this website), involves the subsequent acquisition of the sender's address and of the data supplied by the same, for which the user also expressly provides consent for respective processing. In the event that users enter or otherwise process the data of third parties, they hereby guarantee, assuming any related responsibility, that they have provided the same with the information as per art. 13 of the Italian Legislative Decree no. 196/2003 and obtained their consent to the processing.

### INFORMATION PROVIDED VOLUNTARILY BY USERS FOR MARKETING PURPOSES

If users give their consent for their personal information to be processed, to receive marketing and promotional information about the services provided by Dotweb S.r.l. and receive discounts, free gifts and exclusive offers, in accordance with art. 13 of the Code:

- a) The processing shall have the purpose of completing, managing and fulfilling the request submitted by the data subject to subscribe to the newsletter and to the other mailing lists of Dotweb S.r.l. for the purposes of receiving emails containing marketing, promotional and/or advertising information about Dotweb services; of organizing, managing and fulfilling the above-mentioned request to subscribe including the communication of the information to third-party suppliers and/or to companies in the Aruba Group; of fulfilling legal obligations or other requirements demanded by the competent Authorities.
- b) Processing shall be undertaken electronically/manually.
- c) The information collected shall be used by Dotweb S.r.l. for the complete and proper management of the request to subscribe to the newsletter and mailing lists and shall be passed on to Third Parties for the protection of rights and to fulfil legal or regulatory obligations and at the request of the competent Authorities. The processing thereof shall occur in accordance with principles of decency, lawfulness and transparency, protecting the privacy and the rights of the data subject and third parties.

The individual can at any time object to the use of their email address to receive the above-mentioned communication or to object to that information being processed. To unsubscribe from the newsletter and the mailing lists, the data subject may follow the service cancellation procedure detailed in the marketing

and/or promotional messages sent thereto.

## NAVIGATION DATA

The computer systems and software procedures used to operate this website obtain, during normal usage, certain personal data the transmission of which is implicit in the use of internet communication protocols.

The personal data relates to internet traffic which, due to its nature, cannot be automatically associated to identified users, but by being processed or associated with data held by third parties, it may allow the identification of users/visitors of the website (e.g. IP addresses).

This type of data is only used for anonymous statistical information relevant to website visits or to check that such website is working correctly.

Such personal data is stored by the company Dotweb S.r.l. only for as long as it is necessary and in any case in accordance with the relevant laws in force.

## COOKIES

### GENERAL INFORMATION, DISABLING AND MANAGING COOKIES

Cookies are data sent by the website and stored by the Internet browser on the user's computer or on any other device (e.g., a tablet or a cell phone). The aruba.it website and the relevant sub-domains may install technical cookies and third party cookies.

In any case, the user may manage or request the general disabling or deletion of the cookies, changing the settings of his/her Internet browser. However, disabling might slow down or prevent access to certain sections of the site.

Settings to manage or disable cookies may vary according to the Internet browser used; therefore, to get more information on how to perform such operations, we recommend Users consult the manual of the device used or the "Help" function of the Internet browser.

Find here below the links that explain how to manage or disable cookies for the most popular Internet browsers:

- Internet Explorer: <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies>
- Google Chrome: <https://support.google.com/chrome/answer/95647>
- Mozilla Firefox: <https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer>
- Opera: <http://help.opera.com/Windows/10.00/en/cookies.html>
- Safari: [https://support.apple.com/kb/PH19255?locale=it\\_IT&viewlocale=en\\_US](https://support.apple.com/kb/PH19255?locale=it_IT&viewlocale=en_US)

## TECHNICAL COOKIES

Dotweb s.r.l.

Via degli Orti Oricellari 8d, 50123 Firenze (FI)

Share capital €14.718 fully paid in | FI Company Reg. - 626234 | VAT Reg.. 10574061007

The use of technical cookies, which are cookies necessary to send data through the electronic communication network or cookies that the supplier needs to provide the service requested by the customer, allow safe and efficient use of our site.

Session cookies may be installed in order to enable initial and continued access to the portal reserved area as an authorized user.

Technical cookies are essential for a correct operation of our internet site, and are used to enable users to navigate normally and use the advanced services offered by our website. The technical cookies that are used can be divided into session cookies, which are stored only for the duration of the navigation and until the browser is closed; and permanent cookies, which are saved in the memory of the user's device until their expiry or until they are deleted by the user. Our site uses the following technical cookies:

- Navigation or session technical cookies, used to manage normal web navigation and the user's authentication;
- Functional technical cookies, used to save customizations selected by the user, such as the language;
- Analytics technical cookies, used to learn the way users use our website, so as to evaluate and improve its operation.

### THIRD PARTY COOKIES

Third party cookies may be installed: these are analytics and profiling cookies of Google Analytics, Google Doubleclick, Criteo, Rocket Fuel and Facebook. They are sent by the internet sites of the aforesaid third parties external to our site.

Third party analytics cookies are used to collect information on the users' behavior when they visit the site. The collection is performed in an anonymous way in order to improve the use of the site. Third party profiling cookies are used to create users' profiles in order to propose advertising messages consistent with the choices made by users.

The use of these cookies is governed by the rules set out by said third parties; therefore, we invite users to read the information on privacy and the instructions to manage or disable cookies published in the following web pages:

For Google Analytics cookies:

- privacy policy: <https://www.google.com/intl/it/policies/privacy/>
- instructions on managing or disabling cookies: <https://support.google.com/accounts/answer/61416?hl=it>

For Google Doubleclick cookies:

- privacy policy: <https://www.google.com/intl/it/policies/privacy/>
- instructions on managing or disabling cookies: <https://www.google.com/settings/ads/plugin>

For Facebook cookies:

- privacy policy: <https://www.facebook.com/privacy/explanation>
- instructions on managing or disabling cookies: <https://www.facebook.com/help/cookies/>

For Foursquare cookies:

- privacy policy: <https://foursquare.com/legal/terms>
- instructions on managing or disabling cookies: <https://foursquare.com/legal/cookiepolicy>

For Google+ cookies:

- privacy policy: <https://www.google.com/intl/en-GB/policies/privacy/>
- instructions on managing or disabling cookies: <https://www.google.it/intl/en-GB/policies/technologies/cookies/>

For Instagram cookies:

- privacy policy: <https://help.instagram.com/155833707900388>
- instructions on managing or disabling cookies: <https://www.instagram.com/legal/cookies/>

For Twitter cookies:

- privacy policy: <https://twitter.com/en/privacy>
- instructions on managing or disabling cookies: <https://support.twitter.com/articles/20170514>

For Youtube cookies:

- privacy policy: <https://support.google.com/youtube/answer/2801895?hl=en-GB>
- instructions on managing or disabling cookies: <https://support.google.com/youtube/answer/32050>

For CrazyEgg cookies:

- privacy policy: <https://www.crazyegg.com/privacy/>
- instructions on managing or disabling cookies: <https://www.crazyegg.com/cookies/>

For Rocket Fuel cookies:

- privacy policy: <http://rocketfuel.com/it/privacy/>
- instructions on managing or disabling cookies: <http://rocketfuel.com/it/cookie-policy/>

For Intercom cookies:

- privacy policy: <https://www.intercom.com/terms-and-policies#privacy>
- instructions on managing or disabling cookies: <https://www.intercom.com/terms-and-policies#cookie-policy>

## INFORMATION

Information and requests about privacy may be addressed to Dotweb S.r.l. via:

- e-mail to: [privacy@staff.aruba.it](mailto:privacy@staff.aruba.it)
- mail to: Dotweb S.r.l. Via degli Orti Oricellari 8D 50123 Firenze (FI) ITALY