

## **PERSONAL DATA PROCESSING**

This website collects some Personal Data from its User

## **DATA PROCESSING HOLDER**

Chiancabanca SAS di Farina Gaetano & co  
Via Ludovico Pepe 7 , 72017 Ostuni (BR)  
Indirizzo email del Titolare: [info@chiancabanca.it](mailto:info@chiancabanca.it)

## **TYPE OF DATA COLLECTED**

Among the Personal Data collected by this Website, either independently or through third parties, there are: Cookies; Usage data; Data communicated while using the service; e-mail; first name; surname; telephone number; various types of data.

Complete details on each type of data collected are provided in the dedicated sections of this privacy policy or through specific information texts displayed before the data is collected.

Complete details on each type of data collected are provided in the dedicated sections of this privacy policy or through specific visual information texts. Personal Data may be freely provided by the User or, in the case of Usage Data, collected automatically during the use of this Site Web before the data is collected.

Unless otherwise specified, all data requested by this website are mandatory. If the User refuses to communicate them, it may be impossible for this Website to provide the Service. In cases where this Website indicates some Data as optional, Users are free to refrain from communicating such Data, without this having any consequence on the availability of the Service or its operation.

Users who have doubts about which data are mandatory are encouraged to contact the owner.

Any use of Cookies - or of other tracking tools - by this Website or by the owners of third party services used by this Website, unless otherwise specified, has the purpose of providing the Service requested by the User, as well as for the additional purposes described in this document and in the Cookie Policy, if available.

The User assumes responsibility for the Personal Data of third parties obtained, published or shared through this Website and guarantees to have the right to communicate or disseminate them, freeing the Owner from any liability to third parties.

## **METHOD AND PLACE OF PROCESSING OF COLLECTED DATA**

### Processing methods

The Owner takes appropriate security measures to prevent unauthorized access, disclosure, modification or destruction of Personal Data.

The processing is carried out using IT and / or telematic tools, with organizational methods and with logic strictly related to the purposes indicated. In addition to the Data Controller, in some cases, other subjects involved in the organization of this Website (administrative, commercial, marketing, legal, system administrators) or external subjects (such as third party technical service providers, postal couriers) may have access to the Data. , hosting providers, IT companies, communication agencies) also appointed, if necessary, as Data Processors by the Data Controller. The updated list of Managers can always be requested from the Data Controller.

### Legal basis of the processing

The Owner processes Personal Data relating to the User if one of the following conditions exists:

- the User has given consent for one or more specific purposes; Note: in some jurisdictions the Data Controller may be authorized to process Personal Data without the User's consent or another of the legal bases specified below, as

long as the User does not object ("opt-out") to such treatment. However, this is not applicable if the processing of Personal Data is governed by European legislation on the protection of Personal Data;

- the processing is necessary for the execution of a contract with the User and / or for the execution of pre-contractual measures;
- the processing is necessary to fulfill a legal obligation to which the Data Controller is subject;
- the processing is necessary for the performance of a task of public interest or for the exercise of public authority vested in the Owner;
- the processing is necessary for the pursuit of the legitimate interest of the Data Controller or third parties. However, it is always possible to ask the Data Controller to clarify the concrete legal basis of each treatment and in particular to specify whether the treatment is based on the law, provided for by a contract or necessary to conclude a contract..

#### Place

The Data is processed at the Data Controller's operating offices and in any other place where the parties involved in the processing are located. For more information, please contact the Data Controller.

The User's Personal Data may be transferred to a country other than that in which the User is located. To obtain further information on the place of processing, the User can refer to the section relating to the details on the processing of Personal Data.

The User has the right to obtain information regarding the legal basis for the transfer of Data outside the European Union or to an international organization governed by public international law or consisting of two or more countries, such as the UN, as well as regarding the security measures adopted by the Data Controller to protect the Data.

The User can check if one of the transfers described above takes place by examining the section of this document relating to the details on the processing of Personal Data or request information from the Data Controller by contacting him at the details indicated at the beginning.

#### Retention period

The Data are processed and stored for the time required by the purposes for which they were collected.

Therefore:

- Personal Data collected for purposes related to the execution of a contract between the Owner and the User will be retained until the execution of this contract is completed.
- Personal Data collected for purposes related to the legitimate interest of the Data Controller will be retained until this interest is satisfied. The User can obtain further information regarding the legitimate interest pursued by the Owner in the relevant sections of this document or by contacting the Owner.

When the processing is based on the User's consent, the Data Controller may keep the Personal Data longer until such consent is revoked. Furthermore, the Data Controller may be obliged to keep Personal Data for a longer period in compliance with a legal obligation or by order of an authority.

At the end of the retention period, the Personal Data will be deleted. Therefore, at the end of this term the right of access, cancellation, rectification and the right to data portability can no longer be exercised.

#### **PURPOSE OF THE PROCESSING OF COLLECTED DATA**

The User Data is collected to allow the Owner to provide the Service, comply with legal obligations, respond to requests or executive actions, protect their rights and interests (or those of Users or third parties), identify any malicious activities. or fraudulent, as well as to contact the User.

To obtain detailed information on the purposes of the processing and on the Personal Data processed for each purpose, the User can refer to the "Details on the processing of Personal Data" section.

#### **DETAILS ON THE PROCESSING OF PERSONAL DATA**

Personal Data is collected for the following purposes and using the following services:

- Contact the user

www.chiancabanca.it Website contact forms

By filling in the contact form with their data, the User consents to their use to respond to requests for information, quotes, or any other nature indicated by the form header. Personal Data processed: surname; e-mail; first name; telephone number; various types of data.

- Tag management

This type of service is functional to the centralized management of the tags or scripts used on this Website. The use of these services involves the flow of User Data through them and, where appropriate, their retention.

## **USER RIGHTS**

Users can exercise certain rights with reference to the Data processed by the Data Controller.

In particular, the User has the right to:

- withdraw consent at any time. The User can revoke the consent to the processing of their Personal Data previously expressed.
- oppose the processing of their data. The user can oppose the processing of their data when it occurs on a legal basis other than consent. Further details on the right to object are indicated in the section below.
- access their data. The user has the right to obtain information on the data processed by the owner, on certain aspects of the processing and to receive a copy of the data processed.
- verify and request rectification. The User can verify the correctness of their Data and request its updating or correction.
- obtain the limitation of the treatment. When certain conditions are met, the User can request the limitation of the processing of their Data. In this case, the Data Controller will not process the Data for any other purpose than their conservation.
- obtain the cancellation or removal of their Personal Data. When certain conditions are met, the User can request the cancellation of their Data by the Owner.
- receive their data or have them transferred to another owner. The User has the right to receive his / her Data in a structured format, commonly used and readable by an automatic device and, where technically feasible, to obtain its unhindered transfer to another owner. This provision is applicable when the Data is processed with automated tools and the processing is based on the User's consent, on a contract to which the User is a party or on contractual measures connected to it.
- propose a complaint. The User can lodge a complaint with the competent personal data protection supervisory authority or take legal action.

### Details on the right to object

When Personal Data are processed in the public interest, in the exercise of public authority vested in the Owner or to pursue a legitimate interest of the Owner, Users have the right to object to the processing for reasons related to their particular situation.

Users are reminded that, if their data are processed for direct marketing purposes, they can oppose the processing without providing any reasons. To find out if the Data Controller processes data for direct marketing purposes, Users can refer to the respective sections of this document.

### How to exercise your rights

To exercise the User's rights, Users can direct a request to the contact details of the Owner indicated in this document. Requests are filed free of charge and processed by the Data Controller as soon as possible, in any case within one month.

## **FURTHER INFORMATION ON THE TREATMENT**

### Defense in court

The User's Personal Data may be used by the Owner in court or in the preparatory stages for its eventual establishment for the defense against abuse in the use of this Website or related Services by the User.

The User declares to be aware that the Owner may be obliged to disclose the Data by order of the public authorities.

### Specific information

At the request of the User, in addition to the information contained in this privacy policy, this Website may provide the User with additional and contextual information regarding specific Services, or the collection and processing of Personal Data.

### System log and maintenance

For needs related to operation and maintenance, this Website and any third party services used by it may collect system logs, which are files that record the interactions and which may also contain Personal Data, such as the User IP address.

### Information not contained in this policy

Further information in relation to the processing of Personal Data may be requested at any time from the Data Controller using the contact details.

### Response to "Do Not Track" requests

This Website does not support "Do Not Track" requests. To find out if any third-party services used support them, the User is invited to consult the respective privacy policies.

### Changes to this privacy policy

The Data Controller reserves the right to make changes to this privacy policy at any time by notifying Users on this page and, if possible, on this Website as well as, if technically and legally feasible, by sending a notification to Users through one of the extremes. contact number of which it is in possession. Please therefore consult this page frequently, referring to the date of the last modification indicated at the bottom.

If the changes affect treatments whose legal basis is consent, the Data Controller will collect the User's consent again, if necessary.

## **COOKIE POLICY**

This document contains information about the technologies that allow this Website to achieve the purposes described below. These technologies allow the Owner to collect and save information (for example through the use of Cookies) or to use resources (for example by running a script) on the User's device when the latter interacts with this Website.

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

For example, although Cookies can be used in both web and mobile browsers, it would be out of place to speak of Cookies in the context of applications for mobile devices, since they are Tracking Tools that require the presence of a browser. For this reason, within this document the term Cookie is used only to specifically indicate that particular type of Tracking Tool.

Some of the purposes for which Tracking Tools are used may also require the User's consent. If consent is given, it can be freely revoked at any time by following the instructions contained in this document.

This Website uses Tracking Tools managed directly by the Owner (commonly called "first party" Tracking Tools) and Tracking Tools that enable services provided by third parties (commonly called "third party" Tracking Tools). Unless otherwise specified in this document, these third parties have access to the respective Tracking Tools.

Duration and expiration of Cookies and other similar Tracking Tools may vary depending on what is set by the Owner or by each third party provider. Some of them expire at the end of the User's browsing session.

In addition to what is specified in the description of each of the categories listed below, Users can obtain more detailed and updated information on the duration, as well as any other relevant information - such as the presence of other Tracking Tools - in the privacy policies of their respective third party suppliers. (through the links made available) or by contacting the Owner.

### **Activities strictly necessary to ensure the functioning of this Website and the provision of the Service**

This Website uses Cookies commonly called "technical" to carry out activities strictly necessary to ensure the operation or provision of the Service.

This Website does not use third-party tracking tools

### **How to manage preferences and give or withdraw consent**

There are various ways to manage preferences related to Tracking Tools and to give or withdraw consent, where necessary:

Users can manage preferences related to Tracking Tools directly through the settings of their devices - for example, they can prevent the use or storage of Tracking Tools.

In addition, whenever the use of Tracking Tools depends on consent, the User can give or withdraw this consent by setting their preferences in the cookie policy or by updating these preferences via the tracking settings widget, if here I'm.

Thanks to specific browser or device functions, it is also possible to remove previously saved Tracking Tools.

Other Tracking Tools present in the browser's local memory can be removed by deleting the browsing history.

With regard to third-party Tracking Tools, Users can manage preferences and withdraw consent by visiting the relevant opt-out link (if available), using the tools described in the third party's privacy policy or by contacting it directly.

### Find the settings related to the Tracking Tools

Users can, for example, find information on how to manage cookies in some of the most popular browsers at the following addresses:

- Google Chrome: [https://support.google.com/chrome/answer/95647?hl=it&p=cpn\\_cookies](https://support.google.com/chrome/answer/95647?hl=it&p=cpn_cookies)
- Mozilla Firefox: <https://support.mozilla.org/it/kb/protezione-antitracciamento-avanzata-firefox-desktop?redirectslug=Attivare+e+disattivare+i+cookie&redirectlocale=it>
- Apple Safari: <https://support.apple.com/it-it/guide/safari/sfri11471/mac>
- Microsoft Internet Explorer: <https://support.microsoft.com/it-it/topic/eliminare-e-gestire-i-cookie-168dab11-0753-043d-7c16-ed5947fc64d>
- Microsoft Edge: <https://support.microsoft.com/it-it/microsoft-edge/eliminare-i-cookie-in-microsoft-edge-63947406-40ac-c3b8-57b9-2a946a29ae09>
- Brave: <https://support.brave.com/hc/en-us/articles/360022806212-How-do-I-use-Shields-while-browsing>
- Opera: <https://help.opera.com/en/latest/web-preferences/#cookies>

Users can also manage some Tracking Tools for mobile applications by deactivating them through the appropriate device settings, such as the advertising settings for mobile devices or the settings related to tracking in general (Users can consult the device settings to identify the relevant one).

### Initiatives of the advertising industry for the management of consents

Notwithstanding the foregoing, Users are informed of the possibility of using the information available on YourOnlineChoices (EU), Network Advertising Initiative (USA) and Digital Advertising Alliance (USA), DAAC (Canada), DDAI (Japan) or other similar services. With these services it is possible to manage the tracking preferences of most advertising tools. The Owner, therefore, advises Users to use these resources in addition to the information provided in this document.

The Digital Advertising Alliance also provides an application called AppChoices that helps Users control behavioral advertising on mobile applications.

Since the use of third-party Tracking Tools on this Website cannot be fully controlled by the Owner, any specific reference to third-party Tracking Tools is to be considered indicative. To obtain complete information, Users are kindly invited to consult the privacy policy of the respective third party services listed in this document.

Given the objective complexity of identifying tracking technologies, Users are encouraged to contact the Owner should they wish to receive further information regarding the use of these technologies on this Website.

## **DEFINITIONS AND LEGAL REFERENCES**

- **Personal Data (or Data):** It constitutes personal data any information that, directly or indirectly, also in connection with any other information, including a personal identification number, makes a natural person identified or identifiable.
- **Usage Data:** This is information collected automatically through this Website (including from third-party applications integrated into this Website), including: the IP addresses or domain names of the computers used by the User who connects with this Website, the addresses in URI (Uniform Resource Identifier) notation, the time of the request, the method used to forward the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response from the server (successful, error, etc.) the country of origin, the characteristics of the browser and operating system used by the visitor, the various temporal connotations of the visit (for example the time spent on each page) and the details relating to the itinerary followed within of the Application, with particular reference to the sequence of pages consulted, to the parameters relating to the operating system and the IT environment of the User.
- **User:** The individual who uses this Website who, unless otherwise specified, coincides with the Data Subject.
- **Interested:** The natural person to whom the Personal Data refers.
- **Data Processor (or Manager):** The natural person, legal person, public administration and any other body that processes personal data on behalf of the Data Controller, as set out in this privacy policy.
- **Data Controller (or Data Controller):** The natural or legal person, public authority, service or other body which, individually or together with others, determines the purposes and means of the processing of personal data and the tools adopted, including security measures relating to the operation and use of this Website. The Data Controller, unless otherwise specified, is the owner of this Website.
- **This Website (or this Application):** The hardware or software tool through which the Personal Data of Users are collected and processed.
- **Service:** The Service provided by this Website as defined in the relative terms (if any) on this site / application.
- **European Union (or EU):** Unless otherwise specified, any reference to the European Union contained in this document is intended to be extended to all current member states of the European Union and the European Economic Area.
- **Cookies:** Cookies are Tracking Tools which consist of small portions of data stored within the User's browser.
- **Tracking Tool:** Tracking Tool means any technology - eg. Cookies, unique identifiers, web beacons, integrated scripts, e-tags and fingerprinting - which allow users to be tracked, for example by collecting or saving information on the User's device.
- **Legal references:** This information is drawn up on the basis of multiple legislative systems, including articles 13 and 14 of Regulation (EU 2016/679).

Unless otherwise specified, this information applies exclusively to the website [www.chiancabanca.it](http://www.chiancabanca.it)

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