

PRIVACY POLICY

Dear User,

This page provides information regarding the processing of your personal data in connection with the use of our website.

We provide this privacy policy not only to fulfil legal obligations relating to the protection of personal data pursuant to EU Regulation 2016/679 or “the Regulation”, but also because we believe that the protection of personal data is a fundamental element of our business activities and we wish to provide you with all information that may help you to safeguard your privacy and control the use of your data with respect to browsing our site.

The purpose of this Privacy Policy is to describe the methods for the management of this site, with reference to the processing of the personal data of users/visitors that view it. It is information provided, pursuant to art. 13-14 (C60-C62) of Regulation 679/16 and by virtue of WPs 187 – 259 – 260, to those connected to the www.caffecagliari.it website.

The above site is owned by CAFFÈ CAGLIARI S.p.A., which guarantees compliance with the legislation regarding the protection of personal data. Users/visitors should carefully read this Privacy Policy before sending any type of personal information and/or completing any electronic form found on the site.

[Privacy policy pursuant to art. 13 of Leg. Dec. 196/2003 and article 13 of EU Regulation no. 2016/679](#)

Pursuant to art. 13 of Leg. Dec. 196/2003 (hereinafter “the Privacy Code”) and art. 13 of EU Regulation no. 2016/679 (hereinafter “GDPR 2016/679”), containing provisions to protect people and other legal entities with respect to the processing of personal data, we herewith inform you that the personal data provided by you will form part of the processing in compliance with the aforementioned legislation and the obligations of confidentiality to which CAFFÈ CAGLIARI S.P.A. is obliged.

DATA CONTROLLER

The Data Controller, that is, the entity responsible for decisions regarding the methods and purposes of the processing, is CAFFÈ CAGLIARI S.P.A., with registered office in Modena Via Emilia Est 1129. To contact the Data Controller you can use the e-mail address privacy@caffecagliari.it.

Browsing Data

The information systems and software procedures relied upon to operate this web site acquire personal data as part of their standard functioning; the transmission of such data is an inherent feature of Internet communication protocols. It is information which is not collected to be associated with identified data subjects, but by its nature could, through processes and associations with data held by third parties, permit the users'/visitors' identification (for example, IP address, etc.).

Type of data	IP address and browsing data
Purposes of the processing	<ul style="list-style-type: none">• Browsing the site• Perform statistical analyses (e.g. no. of visitors /year);• Fulfil legal obligations

Obligation or not to provide the data	Obligatory to visit the site and access the various functions of the site
Method and location of processing	Processing connected with the web services of this site take place on the TEL & CO server The personal data are processed mainly on automated tools. Specific security measures are complied with to prevent loss of data, illicit or incorrect uses and unauthorized accesses.
Legal basis of data processing	Your data are processed on the basis of the need to provide the tools necessary for visiting the site and to access their available functions.
Recipients of the data	The persons and legal entities involved are: workers inside the company Staff of the company ESC, appointed as responsible for the external processing of data necessary for the performance of assistance and maintenance activities relating to the website Consultants appointed by the Data Controller for the above purposes
Data retention period	For the duration of the session and the entire duration of use of the site

With regards to time markers (so-called cookies), refer to the specific privacy policy.

Data provided voluntarily by users/visitors

In the event that users/visitors, connecting to this site, forward their personal data to access certain services, or to make requests by e-mail, this implies the acquisition of the sender's address and/or other personal data that will be processed exclusively to respond to the request, or in order to provide the service also of third party companies with which CAFFÈ CAGLIARI S.p.A. has a business agreement.

Information is given below for each type of data:

Type of data	Name and Surname Email Address Data provided voluntarily by visitors / data subject
Purposes of the processing	<p>The processing is carried out to meet requests for:</p> <ul style="list-style-type: none"> • Account registration • Supply of the service requested (e.g. booking visits to the Cagliari S.p.A. museum) • Sending of information and other activities necessary for the conclusion or execution of contracts to which the data subject is a party • Sending of CAFFÈ' CAGLIARI S.P.A.'s newsletter <p>The data collected are processed exclusively for the following purposes:</p> <ul style="list-style-type: none"> - Establishing relationships with the user, in particular for the purpose of responding to requests for information; - Sending communications relating to new site initiatives; - Performing statistical analyses; - Fulfilling legal obligations
Obligation or not to provide data	<p>Obligatory for the creation of the account and the management and execution of your requests</p> <p>Obligatory for the sending of information requested.</p> <p>Obligatory for the execution of the service requested.</p>

Methods and place of processing	<p>Processing connected with the web services of this site take place on the TEL & CO server.</p> <p>The personal data are processed mainly on automated tools. Specific security measures are observed to prevent loss of data, illicit or incorrect uses and unauthorized accesses.</p> <p>Every request for registration for services is checked through a system that requests subsequent confirmation on the part of whoever has made the registration request; this procedure is aimed at verifying that the person that has forwarded the registration request is the true owner of the e-mail address to be registered.</p>
Legal basis of the processing	<p>These data are intended as voluntarily provided by the user when requesting provision of the service.</p> <p>With regards to the purposes linked to management of the account, your data are processed on the basis of the need to carry out your request and subscription to CAFFE' CAGLIARI S.P.A.'s newsletter and the booking of museum visits</p>
Recipients of the data	<p>The data subjects involved are:</p> <ul style="list-style-type: none"> • workers inside the company • Staff of the company, ESC, appointed as responsible for the external processing of data necessary for the performance of assistance and maintenance activities relating to the website • Consultants appointed by the Data Controller for the above purposes
Data retention period	<p>For the period strictly necessary to accomplish the purposes for which the data have been collected.</p> <p>In the event of the processing of data for marketing purposes, the data are retained until revocation of consent on the part of the data subject.</p>

Method of processing

Processing will be automated and/or manual, in compliance with the provisions of art. 32 of GDPR 2016/679 and with regards to security measures.

The processing is carried out by means of operations or a series of operations, including:

- a) The collection, registration, organization, storage, consultation, analysis, rectification, selection, extraction, comparison, use, interconnection, blocking, communication and erasure of the data;
- b) the operations may be performed with or without electronic or, in any case, automated, instruments;
- c) the processing is carried out by the data controller and/or by persons or legal entities assigned the processing (also external).

Please note that, in compliance with the principles of lawfulness, purpose limitation and data minimization, pursuant to art. 5 GDPR 2016/679, subject to your free and explicit express consent, your personal data shall be stored for the period necessary for the accomplishment of the purposes for which they are collected and processed.

Optional provision of the data

Apart from what is specified for browsing data, the users/visitors are free to choose whether or not to provide personal data.

Failed provision may imply, exclusively, the impossibility of obtaining information and/or advice regarding what has been requested.

Communication of the data.

The data shall be known to the data processors and persons tasked with processing and may be communicated to external associates and, in general, to all persons or legal entities that CAFFÈ CAGLIARI S.p.A. deems necessary for the correct fulfilment of the purposes indicated.

Dissemination of the data.

The data provided by you on the website shall not be disseminated directly by CAFFÈ CAGLIARI S.p.A. unless expressly requested by the user.

The information that users of the site decide to make public through the services and tools made available by them (e.g. Facebook, Twitter, Instagram, YouTube, etc.), are provided by the user knowingly and voluntarily, releasing the site from any liability regarding any breaches of the law. The user is responsible for verifying that they have permission for the issue of personal data of third parties or of contents protected by national and international regulations.

Any improper and fraudulent use of the data provided to CAFFÈ CAGLIARI S.P.A. on the part of third party users not authorized by the Data Controller, is not to be considered the direct responsibility of the company, CAFFÈ CAGLIARI S.P.A.

Transfer of data abroad

Personal data may be transferred to countries in the European Union and countries outside the European Union since the site management providers or the different social networks associated with them may be outside EU member States.

DATA SUBJECTS' RIGHTS

MEANS OF EXERCISING THEIR RIGHTS:

A data subject may request the Data Controller the exercise of the rights listed below, by sending an e-mail to the address privacy@caffecagliari.it.

THE RIGHT TO SUBMIT A CLAIM TO A CONTROL AUTHORITY;

A data subject that believes that the processing regarding them breaches EU Regulation 679/16 has the right to submit a claim to a control authority, specifically, in the Member State in which they have residence, work or the place where the alleged breach has occurred.

With regards to Italy, this authority is the Data Protection Authority

ACCESS TO PERSONAL DATA

Pursuant to art. 15 of EU Regulation 679/16, a data subject has the right to access the data and obtain, specifically

You have the right to obtain from the Data Controller or from the data processors, the erasure, communication, updating, rectification and integration of the personal data regarding you, as well as, in general, the exercise of all the rights provided by art. 15-16-17-18-19 of EU Regulation UE 679/16. Specifically, you have the right to access and:

- copy personal data (art. 15 para.3)
In the event of additional copies requested by the data subject, the data controller may charge a reasonable contribution to costs based on administrative costs
- rectification (art. 16)
- erasure of the data (art. 17)
- limitation of processing (art.18) which regard them or to oppose their processing, besides the right to the portability of the data.
- communication to each of the recipients to whom the personal data have been sent (art. 19) of any adjustments or cancellations or limitations of the processing carried out in compliance with articles 16, 17, paragraph 1, and 18, except in the event it is impossible or implies disproportional effort. The data controller shall communicate to the data subject said recipients should the data subject so request

According to the provisions of Reg. UE 679/16, the data controller shall respond to such request within 30 days (in the event of complications for the exercise of the rights, 30 extra days may be requested)

DEFINITIONS OF THE DATA SUBJECT'S RIGHTS:

THE RIGHT OF RECTIFICATION:

users have the right to request the rectification of their personal data if they are imprecise or incomplete. This right also implies that the rectification must be communicated to all third party persons and legal entities involved in the processing of the data in question, unless this is impossible or particularly difficult. Further to the user's request, the organization must also inform them of the identity of said third party persons and legal entities.

THE RIGHT TO ERASURE:

when the data are no longer useful for the purposes for which they have been collected, in the event of withdrawal of consent on the part of the user or the personal data have been processed unlawfully, the user has the right to request the erasure, as well as the termination of any other form of dissemination. The right to erasure may be denied when the personal data are processed for a public interest (such as scientific research), when the data are necessary for legal defense or to fulfil a legal obligation, for the performance of a task in the public interest or for the exercise of public powers to which the data controller is attributed.

The right to erasure may be denied also when the data are necessary for exercising the right to freedom, or when they are processed for health purposes and in the public interest.

THE RIGHT TO LIMIT PROCESSING:

the user has the right to request limitation of the processing of their personal data in the cases in which their accuracy is contested, in the event the user opposes the processing and the organization is assessing whether there is a legitimate reason that excludes processing, in the event the processing is unlawful but the user requests limitation as opposed to erasure, or in the event the data are no longer necessary but the user needs them to establish, exercise or defend a legal claim. Limitation may be communicated to all third party persons and legal entities involved in the processing of the data in question, unless this is impossible or particularly difficult. If requested by the user, the organization must also inform them of the identity of said third party persons and legal entities

THE RIGHT TO OPPOSE:

pursuant to the GDPR, users have the right to oppose certain processing activities carried out by the data controller. Essentially, the user can oppose the processing of their data any time such processing is based on a legitimate interest of the data processor or on the carrying out of a task in the public interest or the exercise of public powers or for research and scientific/historical statistics purposes. The user must motivate their opposition, unless the processing is carried out for direct marketing purposes. In the latter case, in fact, no motivation is necessary for exercising this right

THE RIGHT TO THE PORTABILITY OF THE DATA:

the user has the right to obtain (in a legible electronic form) their personal data for the purpose of transferring them to another data controller, without the current data controller creating any obstruction. Data both "provided" by the user and "observed" data fall under this provision.

RIGHTS RELATING TO AUTOMATED DECISION-MAKING PROCESSES AND PROFILING:

users have the right not to be subject to decision-making processes based on an automated processing activity or a profiling and which produce a legal effect or an otherwise significant effect.

Organizations can adopt automated decisions only if necessary for the execution of a contract, authorized by the legislation of the EU country applicable to the data controller, without legal or similar significant effects for the user or based on the explicit consent of the data subject. It is possible to take automated decisions without the explicit consent of the user only if they relate to special categories of data or for reasons of significant public interest.