Consorzio Agrario di Cremona S.C.R.L

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Personal data processing notice “sito web”



1. Who is the Data Controller (who decides which data to process and how)?

The Data Controller, as defined by Art. 4, par. 1, no. 7 of EU Regulation 2016/679 (General Data Protection Regulation, hereinafter GDPR), is **Consorzio Agrario di Cremona Soc. Coop. a r.l**, with registered office in Via C. Monteverdi, 17, Tax Code and VAT no. 00114930191, hereinafter referred to as the “***Company***”.

Pursuant to Art. 13 of the GDPR, the following information is provided regarding the processing of personal data.



2. Who are the data subjects (the recipients of this notice)?

The data subject is the natural person to whom the personal data processed by the Company refers.

For the purposes of this notice, the data subject is anyone who accesses the Company’s institutional website, hereinafter referred to as the “***User***”.



3. Which data are collected, for what purposes, and on what legal basis (why is the data collected)?

3.1. Data generated by accessing the website

The IT systems and software procedures responsible for the functioning of this site automatically acquire, during their normal operation, certain information whose transmission is implicit in the use of Internet communication protocols.

The collected information may include:

- domain names;

- internet protocol (IP) address;
- operating system used;
- type of browser and parameters of the device used to connect to the site;
- referring web page (referral) and exit page.

This information is processed automatically and collected solely in aggregated form in order to verify the correct functioning of the site and for security purposes.

The legal basis legitimizing the processing is the Company's legitimate interest.

3.2. Data recorded for security purposes

For security purposes (antispam filters, firewalls, virus detection), the data automatically recorded may also include personal data such as the IP address, which may be used, in compliance with applicable laws, to block attempts to damage the site or harm other users, or any harmful or criminal activity.

These data are never used for user identification or profiling, but solely to protect the site and its users.

The legal basis legitimizing the processing is the Company's legitimate interest (Art. 6.1, letter f).

3.3. Geolocation data

The site may collect information regarding the User's geographic location, obtained through the browser or the device used for navigation (e.g., approximate location based on IP address or device geolocation services).

These data are processed exclusively to personalize the User's browsing experience by displaying the services closest to the User, thereby optimizing the use of the website's functionalities.

The legal basis legitimizing the processing is the User's consent (Art. 6.1, letter a).

3.4. Data voluntarily provided by the User through the contact form

Personal data provided by the User via the form are collected and processed for the following purposes:

a) to carry out customer relationship activities based on contractual and/or pre-contractual agreements;
b) for administrative purposes and to fulfil legal obligations such as accounting or tax requirements, or to comply with requests from judicial authorities;
c) for the occasional sending of emails relating to products already purchased or similar to them ("soft spam").

The legal basis legitimizing the processing:

- for the purposes under points 3.3 a), b), and d), is the performance of a contract to which the User is a party, or the execution of pre-contractual measures requested by the User, as well as compliance with legal obligations in the case of requests from judicial authorities;
- for the purposes under point 3.3 c), is the Company's legitimate interest.



4. Is the provision of data mandatory or optional?

With the exception of navigation data, for the other data indicated above, provision is:

- optional for the purposes under point 3.3; refusal will prevent the personalization of content based on geographic location;
- mandatory for the purposes under point 3.4 a) and b); refusal will make it impossible for the Company to fulfil contractual or pre-contractual obligations;

- optional for the purposes under point 3.4 c); refusal will prevent the Company from sending emails concerning previously purchased or similar products.



5. Where are the data processed, how are they processed, and for how long are they retained?

The data collected through the website are processed at the Data Controller's registered office and at the datacenters of the web hosting provider duly appointed as Data Processor.

The data are processed using electronic and automated tools, or manual processing methods strictly related to the purposes for which they were collected, and always in a way that guarantees their security.

Data are retained for the period strictly necessary to fulfil the purposes for which they are processed ("storage limitation principle", Art. 5 GDPR) or in compliance with legal requirements.

Obsolescence checks are periodically carried out.

Navigation data used for security purposes are retained for 5 years.

The Company applies rules preventing indefinite retention of data and limiting storage in accordance with the principle of data minimization.



6. Who is authorized to process the data and to whom may it be disclosed? (continued)

Data processing is carried out by internal Company personnel specifically identified and authorized, and instructed in compliance with current regulations.

Data may be processed by, or communicated to, third parties appointed as external data processors or, where applicable, as independent data controllers, including:

- companies within our corporate group for the purposes under point 3.3 a), b), and e);
- individuals, companies, associations, or professional firms providing assistance or consulting services to the Company for the purposes under point 3.3 b) and e);
- companies, entities, or associations providing services connected or instrumental to the above purposes (market analysis and research, credit card payment management, IT system maintenance).

Data may also be disclosed, in cases provided by law, upon legitimate request by the Judicial Authority.

Under no circumstances will your data be disseminated.



7. Can data be transferred outside the EU?

Data may be transferred to non-European countries, particularly the United States, only after verifying the Standard Contractual Clauses (SCCs) adopted/approved by the European Commission under Art. 46(2)(c-d) GDPR, or Binding Corporate Rules under Art. 47 GDPR, or, where absent, one of the derogations under Art. 49 GDPR.

Transfers to the United States are authorized under the EU-US Data Privacy Framework (available **here**), which requires no further consent.

Links to information regarding GDPR compliance of third-party services:

- Google: here
- Facebook & Instagram (Meta): here
- LinkedIn: here and here
- Google Analytics: here and here

8. What are the User's rights?

Regarding their personal data, the User has the right to:

a) withdraw consent (Art. 7.3 GDPR);
b) access and obtain a copy of the data (Art. 15 GDPR);
c) request rectification (Art. 16 GDPR);
d) request erasure ("right to be forgotten") (Art. 17 GDPR);
e) obtain restriction of processing (Art. 18 GDPR);
f) receive the data in a structured, commonly used, machine-readable format (right to portability) (Art. 20 GDPR);
g) object to processing (Art. 21 GDPR).

The User may exercise these rights or request additional information by emailing: privacy@consorzioagrario.cr.it, specifying the subject of the request.

Requests will be processed without undue delay and in any case within one month; this term may be extended by 2 additional months in cases of particular complexity or numerous requests.

The User has the right to lodge a complaint with the Italian Data Protection Authority (Art. 77 GDPR).