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## SITE TRACKING MEANS POLICY

This information (hereinafter, for simplicity, "**Cookie Policy**") governs the processing of your personal data during the navigation of the website [www.albamilagro.com](http://www.albamilagro.com) ("**Site**"), through the use of cookies and other tracking tools, carried out by Alba Milagro INTERNATIONAL S.p.A., with registered office in Via Corridoni 19, 20015 Parabiago (MI), VAT number 11707620156, email [info@albamilagro.com](mailto:info@albamilagro.com) ("**Data Controller**"), in compliance with current regulations on the protection of personal data, including EU Regulation 2016/679 ("**GDPR**") and Directive 2002/58/EC ("**Directive**") and any subsequent amendments.

### 1. Identity and contact details of the Representative

Since the Data Controller is established in the EU territory, no representative has been appointed.

### 2. Contact details of the data protection officer

The Data Controller has appointed a Data Protection Officer ("DPO") pursuant to Art. 37 GDPR. The DPO can be contacted at the address [dpo@albamilagro.com](mailto:dpo@albamilagro.com).

### 3. Means and purposes of processing

#### *Navigation data*

To complete the connection to the Site, some of your personal data are acquired. This set of data includes, for example:

- the IP address of the device you are using;
- the date and time of access;
- the type of web browser;
- the operating system used.

#### **Cookie**

Cookies are small text files that are downloaded to your device when you visit the Site. They are used to improve your user experience. Cookies can remember your preferences, such as language or Site settings, to make subsequent visits to the Site easier and more personalized.

Cookies can be classified in various ways:

- Based on the duration of information storage:
  - **Session cookies:** these are temporary and are deleted every time you close your browser.
  - **Persistent cookies:** these remain on your device until you delete them or until they expire.
- Based on who manages the cookies:

- **First-party cookies:** these cookies are installed and managed directly by the Data Controller.
- **Third-party cookies:** these are installed by other websites that provide various services to the Site. In other words, these cookies are managed by websites different from the one you are visiting.
- Based on the functional purpose of the cookie:
  - **Technical cookies:** cookies in this category allow the Site to function correctly.
  - **Statistical cookies:** cookies in this category allow statistical analysis to be carried out related to various domains, websites, or apps attributable to the Data Controller.
  - **Marketing cookies:** cookies in this category allow the Data Controller to carry out marketing activities.
  - **Profiling cookies:** cookies in this category allow the Data Controller to track information about you in order to provide you with personalized services based on your needs and preferences.

Below is a list of all the cookies used by the Data Controller within the Site:

#### *Technical cookies*

Cookie	First/Third Party	Description	Duration
Milagro2023_language	First Party	Storage the language selected by the user	One year
Milagro2023	First Party	Storage consent about cookies	One year

#### 4. Delete and disable cookies

You can configure your browser to prevent the processing of cookies, or delete them immediately after browsing. Below, we list how to disable and delete cookies with the major browsers:

<b>Delete/disable cookies with Firefox</b>	<a href="https://support.mozilla.org/en-US/kb/clear-cookies-and-site-data-firefox">https://support.mozilla.org/en-US/kb/clear-cookies-and-site-data-firefox</a>
<b>Delete/disable cookies with EDGE</b>	<a href="https://support.microsoft.com/en-us/microsoft-edge/delete-cookies-in-microsoft-edge-63947406-40ac-c3b8-57b9-2a946a29ae09">https://support.microsoft.com/en-us/microsoft-edge/delete-cookies-in-microsoft-edge-63947406-40ac-c3b8-57b9-2a946a29ae09</a>
<b>Delete/disable cookies with Chrome</b>	<a href="https://support.google.com/chrome/answer/95647?hl=en">https://support.google.com/chrome/answer/95647?hl=en</a>

## 5. Legal basis of processing and optionality of consent

- a) **Personal data processed during Site navigation:** the communication of such personal data is a contractual obligation, without which the Site's own services could not be made available and function correctly.
- b) **Personal data processed with technical cookies:** the communication of personal data is a contractual obligation, without which the Site's own services could not be made available and function correctly.
- c) **Personal data processed with statistical cookies:** the communication of personal data is purely optional. If you do not express your consent to the communication of such data, it will be impossible for the Data Controller to carry out this tracking activity. The legal basis for processing is your consent, given in accordance with current regulations.
- d) **Personal data processed with marketing cookies:** the communication of personal data is purely optional. If you do not express your consent to the communication of such data, it will be impossible for the Data Controller to carry out this tracking activity. The legal basis for processing is your consent, given in accordance with current regulations.
- e) **Personal data processed with profiling cookies:** the communication of personal data is purely optional. If you do not express your consent to the communication of such data, it will be impossible for the Data Controller to carry out this tracking activity. The legal basis for processing is your consent, given in accordance with current regulations.

You may consent to the processing of personal data through the means of tracking described in this Cookie Policy by clicking on specific boxes within appropriate banners.

## 6. Profiling

If you consent to processing with tracking methods to enjoy personalized services, your personal data may be subject to automated decision-making, using one or more specific algorithms that will decide which communications are most suitable for your profile or which may be of interest to you.

## 7. Source from which personal data originate and categories of data

The Data Controller will only process the personal data you have provided in accordance with the Cookie Policy, collected through the Site. The Data Controller will not process data coming from publicly accessible sources. The Data Controller will not process special categories of personal data as referred to in Article 9 of the GDPR.

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## 8. Recipients and Categories of Recipients of Personal Data

The recipients of personal data may include:

- communication companies that carry out commercial communication and profiling activities on behalf of the Data Controller, if the relevant consent has been given, which act as data processors;
- companies that offer information society services, including, in particular, those that offer hosting services;
- companies that carry out statistical and market research, if the relevant consent has been given.

## 9. Data Transfer

The Data Controller intends to transfer personal data to entities established in a third country outside the European Union or to an international organization. Such entities may include, for example:

- communication companies that carry out communication activities on behalf of the Data Controller;
- providers of information society services;

The transfer of personal data to such entities, if established in a third country or an international organization, is carried out in the presence of an adequacy decision by the European Commission, which has verified that the third country, the territory, or one or more specific sectors within the third country, or the international organization in question, ensure an adequate level of protection of rights. In any case, the Data Controller, if deemed appropriate, reserves the right to conclude specific separate agreements that oblige such entities to adopt adequate security measures, including organizational measures, aimed at offering appropriate guarantees for your rights. Personal data may thus be transferred to the following countries: United States of America. To obtain a copy of such data or the place where they have been made available, it is sufficient to send the relevant request to the Data Controller, at the addresses indicated above..

## 10. Data Retention Period

- a) **Personal data processed during browsing the Site:** The Data Controller will retain your personal data processed during browsing the Site for a period not exceeding 12 (twelve) months from the date of each collection.
- b) **Personal data processed with technical cookies:** The Data Controller will retain your personal data processed with technical cookies to allow you proper use of the Site for a period not exceeding 12 (twelve) months from the date of each collection.

- c) **Personal data processed with statistical cookies:** The Data Controller will retain your personal data processed to provide personalized services through statistical cookies for a period not exceeding 12 (twelve) months from the date of each collection.
- d) **Personal data processed with marketing cookies:** The Data Controller will retain your personal data processed to provide personalized services through marketing cookies for a period not exceeding 12 (twelve) months from the date of each collection.
- e) **Personal data processed with profiling cookies:** The Data Controller will retain your personal data processed to provide personalized services through profiling cookies for a period not exceeding 12 (twelve) months from the date of each collection.

## 11. Right to Object

As a Data Subject, you have the right to object as follows:

- the right to object at any time, for reasons related to your particular situation, to the processing of Personal Data concerning you under Article 6, paragraph 1, letters e) or f) of the GDPR. The Data Controller will refrain from further processing your personal data unless the Data Controller demonstrates compelling legitimate grounds for the processing that override your interests, rights, and freedoms or for the establishment, exercise, or defense of legal claims;
- if personal data are processed for direct marketing purposes, you have the right to object at any time to the processing of personal data concerning you for such purposes, including profiling to the extent that it is related to direct marketing;
- in the case of objection to processing for direct marketing purposes, personal data are no longer subject to processing for such purposes. You may object to the processing of your personal data for direct marketing purposes also only in part, for example by objecting only to the sending of promotional communications made through automated and/or digital tools, or to the sending of paper communications and/or receiving telephone communications;
- if your personal data are processed for scientific or historical research purposes or for statistical purposes under Article 89, paragraph 1 of the GDPR, for reasons related to your particular situation you have the right to object to the processing of personal data, unless the processing is necessary for the performance of a task carried out for reasons of public interest.



## 12. Other Rights

The Data Controller also wishes to inform you of the existence of the following rights:

- **Right of Access:** You have the right to obtain from the Data Controller confirmation as to whether or not personal data concerning you are being processed, and to access your personal data and specific information, in accordance with Article 15 of the GDPR.
- **Right to Rectification:** You have the right to obtain from the Data Controller the rectification of inaccurate personal data concerning you without undue delay. Taking into account the purposes of the processing, you have the right to have incomplete personal data completed, including by means of providing a supplementary statement, in accordance with Article 16 of the GDPR.
- **Right to Data Erasure, including the right to withdraw consent:** You have the right to obtain from the Data Controller the erasure of your personal data without undue delay or to withdraw consent to processing, if the reasons defined by Article 17 of the GDPR apply. You have the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.
- **Right to Restriction of Processing:** You have the right to obtain from the Data Controller the restriction of processing, when the conditions defined by Article 18 of the GDPR apply.
- **Right to Data Portability:** You have the right to receive your personal data provided to the Data Controller in a structured, commonly used, and machine-readable format, and you have the right to transmit those data to another controller without hindrance from the Data Controller indicated in this Privacy Notice, as provided by Article 20 of the GDPR.
- **Right to Object to Commercial Communications:** As a contracting party, you have the right to object at any time, free of charge, to receiving commercial communications from the Data Controller.
- **Right to Lodge a Complaint with the Supervisory Authority:** You have the right to lodge a complaint with the Data Protection Authority to report a violation of the regulations on the protection of personal data, in accordance with Article 77 of the GDPR.

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### 13. How to Exercise Your Rights

You can exercise the rights indicated in the Privacy Notice by sending requests directly to the Data Controller at the email address [info@albamilagro.com](mailto:info@albamilagro.com), or by sending the relevant communication by registered mail with return receipt to the registered office of the Data Controller as indicated above. You can lodge a complaint with the Data Protection Authority according to the procedures provided on the official website, by addressing it to the contacts available at the address <https://www.garanteprivacy.it/home/footer/contatti>.

### 14. Accessibility of the Privacy Notice

The Privacy Notice is available on the Site or at the premises of the Data Controller. If expressly requested, the Data Controller may provide the information orally, provided that your identity is verified, with a telephone request to the following number: +39 0331 495211.

### 15. Changes

The Data Controller may modify the Cookie Policy, also to comply with national and/or European Union legislation or technological innovations. Any new versions of the Cookie Policy will be posted on the Site. We invite you to periodically check the Cookie Policy. Any changes will be communicated to you through a pop-up on the Site or different methods and/or digital tools. If the Data Controller substantially changes the Cookie Policy, introducing new processing purposes and/or categories of processed personal data or changing third parties, the Data Controller will inform you and request the necessary consents through a specific banner. If it is impossible for the Data Controller to verify the successful storage of cookies on your device during a subsequent visit to the Site, for example in the case of deletion of installed cookies, the Data Controller will inform you and request the necessary consents through a specific banner. If at least 6 (six) months have passed since the previous presentation of the banner on the Site, the Data Controller will inform you and request the necessary consents through a specific banner.