

# Information on the processing of personal data on the website of Lepida S.c.p.A.

## 1. Preliminary remarks

This document describes the management rules of the portal of Lepida S.c.p.A, with specific reference to the processing of personal data of visitors who consult it.

Lepida S.c.p.A. is committed to respect and protect confidentiality by processing the personal data provided in compliance with the legislation provided to ensure the security, accuracy, updating and relevance of data, with respect to the stated purposes. The personal data provided by users who forward requests are used only to execute the request forwarded on the single occasion, and are communicated to third parties only when strictly necessary and functional to that purpose, in compliance with the specific information made available according to the current legislation. The data are processed by personnel specifically authorized to process the data, only when the processing is necessary for the performance of the tasks assigned.

## 2. Identity and contact details of the data controller

The Data Controller of the personal data referred to in this Policy is Lepida S.c.p.A., with registered office in Via della Liberazione n. 15, 40128, Bologna, Italy..

## 3. The Personal Data Protection Officer

As provided by the EU Regulation 2016/679 of the European Parliament and by the Council of April 27th, 2016 on the protection of individuals with regard to the processing of personal data, Lepida S.c.p.A. has appointed Eng. Kussai Shahin, who can be contacted at [dpo@lepida.it](mailto:dpo@lepida.it), as the Data Protection Officer.

## 4. Data Processors

Lepida S.c.p.A. may use third parties to carry out activities and the related processing of personal data, of which retains the ownership. In accordance with law provisions, these subjects ensure levels of experience, capacity and reliability capable of ensuring compliance to current provisions on the processing, including the aspects relate to data security.

Lepida S.c.p.A. formalises instructions, tasks and charges for these third parties with their designation as "Data Processors". It performs periodic checks on these subjects, in order to ascertain the maintenance of the levels of guarantee verified on the occasion of the initial assignment.

## 5. Subjects authorized to the treatment

Your personal data are processed by internal personnel previously authorized and designated as the person in charge of the processing, who are given appropriate instructions on measures, devices, modus operandi, all aimed at the effective protection of your personal data.

## **6. Purpose and legal basis of processing**

The processing of your personal data is carried out by Lepida S.c.p.A. for the performance of institutional functions, including the dissemination and communication of initiatives and institutional activities implemented by the Company.

### **6.1 Types of data processed and purposes of processing**

The computer systems and software procedures used to operate the websites of Lepida S.c.p.A. acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols. This information is not collected in order to be associated with identified interested parties, but by its very nature could, through processing and association with data held by third parties, allow the identification of users. This category of data includes IP addresses or domain names of computers used by users who connect to the site, URIs (Uniform Resource Identifier) of requested resources, the time of the request, the method used to submit 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..) and other parameters relating to the operating system and computer environment.

These data, necessary for the use of web services, are also processed for the purpose of:

- obtain statistical information on the use of the services (most visited pages, number of visitors per time slot or day, geographical areas of origin, etc.);
- check the correct functioning of the offered services.

The data could be used to ascertain responsibility in the event of hypothetical computer crimes against the site: except for this possibility, the data on web contacts persist for a time not exceeding what is necessary for the purposes for which they are collected and subsequently processed.

### **6.2 Data provided by the user**

The optional, explicit and voluntary sending of e-mail messages to the addresses indicated on this site involves the subsequent acquisition of the sender's address, necessary to respond to requests, and any other personal data included in the same request. The optional, explicit and voluntary registration through special web forms on our site involves the subsequent acquisition of all the data reported in the fields filled by the user; the treatment, in accordance with what is reported in the specific information for each form, is carried out exclusively for the fulfillment of Company activities.

## **7. Cookie policy**

### **7.1 What they are and the purposes of their collection**

A "cookie" is a small text file created by some websites to store information on your computer when you access the site. Cookies are sent by a web server to the user's browser and stored on the user's computer; they are then read by the website when the user visits it again.

### **7.2 Types of cookies used**

The Lepida S.c.p.A. portal does not use profiling cookies: no personal data collected by Lepida S.c.p.A. during users' navigation is used to send advertising messages in line with the preferences expressed by the user while surfing the web.

### **7.2.1 Technical and functional cookies**

These are the cookies necessary to allow navigation on the sites of Lepida S.c.p.A. and to use different functions and services requested by users.

The use of these cookies allows Lepida S.c.p.A., for example, to increase the security of the service requested by the user, or to remember the preference, for example the language, regarding the web pages visited.

### **7.2.2 Analytics cookies**

The portal uses first-party analytical cookies, utilized only by the operator of the portal, for example to estimate the number of unique visitors, and for purposes of mere monitoring, such as to identify the main keywords for search engines that lead to an institutional web page or to identify the problems of navigation of the website.

These data do not allow to identify the user personally because they are automatically "anonymized" before being processed by the software for statistical analysis of web accesses.

In accordance with art. 122 of the Code for the protection of personal data and the provision by the Guarantor for the protection of personal data concerning the "Identification of simplified methods for the information and acquisition of consent for the use of cookies" of May 8th, 2014, published in the Official Gazette n. 126 of June 3rd, 2014, Lepida S.c.p.A. may install on the user's browser the technical cookies essential for the correct functioning of a website, as well as the analytics and functional cookies described above, since they are assimilated by law to the technical cookies, even without their prior consent, without prejudice to the obligation to provide information pursuant to art. 13 of EU Regulation n. 2016/679.

### **7.2.3 Analytics cookies by third parties**

In some cases, the Google Analytics service is also used: it utilizes cookies to perform statistical analyses for the monitoring of visitors. The data is collected anonymously by Google Analytics (without the last 3 digits of the IP address) and is not cross-referenced with other information held by Google, so that these cookies are similar to technical cookies and do not require the prior consent of users.

For more information, please refer to the Google Analytics "Data Protection" Guide: <https://support.google.com/analytics/answer/6004245>.

Google also provides a browser add-on for deactivating Google Analytics, which can be found at: <https://tools.google.com/dlpage/gaoptout?hl=it>.

### **7.2.4 Cookies by third parties**

In some cases cookies by "third party" may be used: they are managed directly by third parties without Lepida S.c.p.A. carrying out any processing. For example, third-party cookies may be transmitted when interacting with sharing plugins or social media authentication, when viewing videos residing on a YouTube

channel, when viewing a form containing Google's Captcha. Some of these features are better described below.

### **7.2.5 Utilization of social networking plug-ins**

The Lepida S.c.p.A. websites are integrated with some social network plug-ins, in particular Facebook, Twitter, Google, to allow users to publicly share the contents of the Lepida S.c.p.A. sites that they find interesting.

When the user visits a page of a Lepida S.c.p.A. website, the existing plug-ins establish a direct connection between the user's browser and the social networks. Through this connection the social networks acquire some information about the user, such as IP address, date and time of visit, browser used, etc.. Moreover, if the user is connected (and therefore authenticated) on one of these social networks, the information collected can be linked to his or her social profile. Lepida S.c.p.A., on the other hand, does not collect any of the information that is transmitted to the social network through the plug-in.

For further information on the plug-ins used on the portals of Lepida S.c.p.A., please refer to the following links:

- Facebook: <http://www.facebook.com/help/social-plugins/>
- Twitter: <http://dev.twitter.com/>
- Google: <https://developers.google.com/+/web/buttons-policy?hl=en>

### **7.2.6 Authentication via social networks**

On some portals, Lepida S.c.p.A. utilizes social network plug-ins to allow users to authenticate themselves and access special portions of the site using the credentials with which they have registered on social networks.

The social networks used are: Facebook, Twitter, Google, LinkedIn. In addition, the FedERa system, promoted by the Emilia-Romagna Region and led by the company Lepida S.c.p.A., is used to ensure that citizens and companies have access to federated authentication, through which they can access online services provided by all local authorities in Emilia-Romagna.

In these cases, Lepida S.c.p.A. manages the authentication process for the sole purpose of allowing access to the institutional sites and online services of local public bodies.

Lepida S.c.p.A. has no government over the cookies installed by the above mentioned social networks, defined as Third Party cookies and, therefore, in order to allow users to know the methods and purposes of processing of user information by Third Parties, the following links to the information and consent forms licensed by Third Parties are provided:

- Facebook privacy policy: <http://www.facebook.com/about/privacy/>
- Twitter privacy policy: <https://twitter.com/privacy>
- Google privacy policy: <http://www.google.com/intl/it/policies/privacy/>
- LinkedIn privacy policy: [https://www.linkedin.com/legal/privacy-policy?trk=hb\\_ft\\_priv](https://www.linkedin.com/legal/privacy-policy?trk=hb_ft_priv)

### **7.3 Browser settings to disable cookies**

### 7.3.1 Disabling the use of cookies

You can disable the use of cookies by changing your browser settings, for example:

- Firefox: <https://support.mozilla.org/it/kb/Gestione%20dei%20cookie>
- Internet Explorer:  
<http://windows.microsoft.com/it-it/windows7/how-to-manage-cookies-in-internet-explorer-9>
- Chrome: <https://support.google.com/chrome/answer/95647?hl=it%20>
- Safari: [https://support.apple.com/kb/PH19214?viewlocale=it\\_IT&locale=en\\_US](https://support.apple.com/kb/PH19214?viewlocale=it_IT&locale=en_US)
- Safari iOS: <https://support.apple.com/it-it/HT201265>

If your browser is not one of above, select the "Help" function on your browser to find information on how to proceed.

### 7.3.2 Activating the "anonymous navigation" mode

With this function now available in all browsers, you can surf the Internet without saving any information about the sites and pages visited.

However, even if this feature is enabled, the navigation data is recorded and stored by the website operators and the connectivity providers.

### 7.3.3 Deleting cookies directly

Currently, almost all browsers permit to delete all cookies installed.

For more instructions, see your browser's help section or visit one of the following links:

- Cookies settings on Internet Explorer:  
<http://windows.microsoft.com/it-IT/internet-explorer/delete-manage-cookies#ie=ie-9>
- Cookies settings on Firefox: <https://support.mozilla.org/it/kb/Eliminare%20i%20cookie>
- Cookies settings on Chrome:  
[https://support.google.com/chrome/answer/95647?hl=it&ref\\_topic=3421433](https://support.google.com/chrome/answer/95647?hl=it&ref_topic=3421433)
- Cookies settings on Safari (iOS): <http://support.apple.com/kb/HT1677>

However, each time you browse again cookies will be installed; for this reason we invite you to perform this operation periodically or use automated functions for the periodic deletion of cookies.

## 8. Links to external sites

This website contains hyperlinks called "links" (i.e. tools that allow links to a web page of another site): external sites accessible through links through Lepida S.c.p.A. are developed and managed by subjects over which the Company has no ownership or control and is in no way responsible for the content, quality, accuracy and services offered. The visit and use of the sites, consulted by the user from this site through links, therefore, is left exclusively to the total discretion and responsibility of the user. This information is

therefore provided only for the websites of Lepida S.c.p.A. and not for other websites that may be consulted by the user through links.

### **9. Recipients of personal data**

Your personal data are not subject to communication or dissemination.

### **10. Transfer of personal data to non-EU countries**

Your personal data shall not be transferred outside the European Union.

### **11. Rights of complaint**

Interested parties who believe that the processing of their related personal data, carried out through this site, is in violation of the provisions by the Regulation, have the right to send a complaint to the Guarantor for the protection of personal data, as provided by art. 77 of the Regulation itself, or to start an action before the appropriate courts (art. 79 of the Regulation).