

## **Privacy Policy and Cookies Policy**

This document highlights the privacy policies for personal data processed by I Saloni Nautici S.p.A. (from here onwards referred to as I Saloni) and the UCINA Italian Marine Industry Association (hereinafter referred to as the UCINA). Its aim is to describe how to manage the personal data of users and visitors of this website and to provide a general description about personal data processing.

This website is owned by I Saloni Nautici S.r.l. and is managed by the company Meloria S.r.l.

For the purposes of current applicable legislation on personal data protection (i.e. the EU Regulation 2016/679 - General Data Protection Regulation, hereinafter referred to as “GDPR” and, for the applicable part, Legislative Decree no. 196/03), we inform you that the companies I Saloni and UCINA, both located in Via S. Nazaro 11, 16145 Genoa Italy, are the Joint Controllers (pursuant to Article 26 of the GDPR) for the processing of your personal data (from here forwards together and jointly the Joint Controllers or the Data Controller) and are available at the following addresses: Tel +39 010 5769811; Fax +39 010 5531104; e-mail: preferably to [press@isaloninautici.com](mailto:press@isaloninautici.com) or [ucina@webh24.it](mailto:ucina@webh24.it).

The Joint Controllers shall adopt the following policy as required by Article 12 of the GDPR as a measure to provide the data subject with the information referred to in Article 13 of the GDPR and the communications referred to in Articles 15 to 22 and 34 of the GDPR related to the processing of data provided. This policy describes how we collect, use and process your personal data, and how, by doing so, we provide you with services and fulfil our legal obligations to you. Your privacy is important to us and we are committed to protecting it and safeguarding your personal data protection rights in compliance with the principles of lawfulness, fairness and transparency.

This policy is intended as general guidelines, provided to all those who interact with the website and with the Data Controller. It contains the essential policies on how we handle the processing of personal data, including data accessible by electronic means from the website address [www.saloninautico.com](http://www.saloninautico.com), which is the homepage of the official I Saloni website. The policy is not valid for other websites that may be visited through our links, of which the Joint Controllers are in no way responsible. In addition, our website uses social plug-ins (for example, in relation to social networks such as Facebook, YouTube and Twitter), for which the Joint Controllers are in no way responsible; therefore, please refer to the privacy policy of the owners of these plug-ins.

It is our practice to constantly update the website and adapt it to legislative changes. Therefore, we may modify this document and/or privacy policy accordingly. For updates, please visit this page, where we will publish any changes. If you have any questions or concerns regarding these privacy policies, you can contact the Joint Controllers at any time by writing to: [ucina@ucina.net](mailto:ucina@ucina.net).

The Joint Controllers undertake to respond to users who send formal written complaints to this address in order to investigate the reported problem. They will also collaborate with the relevant authorities, to resolve any complaints regarding the transfer of personal data that are not resolved directly between the Joint Controllers and the individual data subjects.

In order to avoid misunderstandings, some **definitions** of the terms used in this document are listed below for clarification:

- Personal data: “any information relating to an identified or identifiable natural person [...]”;
- Processing: “any operation or set of operations which is performed on personal data or on sets of personal data [...]”;
- Profiling: “any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person [...]”;
- Data subject: the natural person to whom the personal data refers;
- Data controller: “the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data [...]”;
- Data processor: “a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller”;
- Consent of the data subject: “any freely given, specific, informed and unambiguous indication of the Data Subject’s wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her”.

### **Data processing policy pursuant to Articles 13 and 14 of the GDPR**

The Joint Controllers wish to inform you that the Personal Data you provide through contacting the Joint Controllers by browsing this website or completing our Forms, data which is not included in the special categories of personal data as listed in Article 9 of the GDPR relating to the Data Subject (also in case of the subject operating as an individual enterprise, small entrepreneur or professional) or to their employees, agents, representatives or collaborators (the “Data”), will be processed in accordance with the provisions of the GDPR. The processing is carried out according to the conditions of lawfulness outlined in Article 6 of the GDPR, for the

purposes linked to the relationship established with the Joint Controller. Therefore its legal basis, as required under Article 13 letter c of the GDPR, finds justification in the reasons for which the relationship with the Joint Controllers is established, i.e. access as a visitor or user to the Joint Controllers' website or the motivation for which you have sent a data acquisition form that you have compiled on this website or downloaded from this website and then sent to take advantage of a service related to the form.

The processing of the data given to the Joint Controllers will include: management, organisation, use, storage, creation of databases, processing throughout the EU and outside the EU (countries falling in the categories relating to Articles 45 and 46 of the GDPR), performance of statistics and communication to the partners with whom the initiatives will be developed - all subjects that will be appointed as external processors pursuant to Article 28 of the GDPR, and to institutions, bodies and to ICE. The processing carried out by partners of the Joint Controllers is always for the benefit of the user only, without aggressive marketing aims, with the opportunity to opt-out, even subsequently, of the proposed initiative. The processing will also include the destruction and modification of the data processed at the data subject's request, consultation, communication of our future initiatives, handling, soft spam through e-mail and light marketing, sending promotional material as well as using it to promote conferences and meetings, and cancellation.

On this occasion, we inform all interested parties, as required by Article 14 of the GDPR, that in some cases the Data Controller has drawn data, as specified in paragraph (61) of the GDPR, from various public sources such as newspapers, blogs, public lists and online searches. All data, which is not included in the special categories of personal data listed in Article 9 of the GDPR, is collected and processed considering the principle of purpose with the source. This data (both personal and e-mail) forms part of the Data Controller's DB (the legal basis as required under Article 13 letter c of the GDPR is justified in the legitimate interest of the Data Controller pursuant to Article 6 paragraph) used (in the EU and non-EU territory in the hypotheses according to Articles 45 and 46 of the GDPR) in order for the Data Controller to carry out soft spam, to keep the Data Subject informed about their initiatives (i.e. registration reminder for I Saloni fairs or for events related to the wider nautical industry). The communication of this soft spam to the Data Subject will enable them to take advantage of this to better carry out their recreational and working activity and they may cancel at any moment by following the instructions included in the communication footer.

Please also note that the processing of data related to the web services offered by this website hosted at [aziendeitalia.com](http://aziendeitalia.com), is carried out in part by the Data Controller but primarily by the company Meloria S.r.l. and its employees, collaborators or authorised third parties, also in the case of occasional maintenance operations.

We collect a limited amount of data from those who visit our website, which we use to improve your experience of using it and to manage the services that we provide. This data includes information on how the website is used, how often it is accessed and when it is most popular. In addition, please note that, while browsing the website, you will be given the opportunity to contact the Joint Controllers, also through non-electronic means.

The data will be processed in paper and/or electronic form by persons specifically authorised for processing. The provision of data is optional, except where it is automatically acquired by the system, and it is understood that by continuing to browse and not disabling cookies (see cookies policy) consent will be given in any case pursuant to Article 4 Paragraph 11. The Joint Controllers do not handle any data based on automated decision-making processes. The data will be kept for 5 years and in any case for the time necessary to satisfy the purpose of the collection (except for cookies, for which the storage terms are specified in the related “Cookies” area).

The Joint Controllers also declare that they guarantee the **rights** to rectification pursuant to Article 16 of the GDPR, the right to erasure pursuant to Article 17 of the GDPR, the right to restriction of processing pursuant to Article 18 of the GDPR and the right of access by the data subject to their personal data, as listed under Article 15 of the GDPR.

They also have the following rights:

- 1) to ask the Joint Controllers of the processing for access to personal data and for the rectification or cancellation of this data, or the limitation of the processing of data concerning them, or;
- 2) to oppose its processing;
- 3) to data portability pursuant to Article 20 of the GDPR;
- 4) where the processing is based on Article 6, Paragraph 1(a) or Article 9, Paragraph 2(a) to withdraw consent at any time without prejudice to the lawfulness of the processing, based on the consent given before the revocation;
- 5) to lodge a complaint with a supervisory authority;
- 6) to see the rights set forth in Article 21 of the GDPR, including therefore the right to oppose at any time, for reasons related to their particular situation, the processing of data for the pursuit of the legitimate interest of the Data Controller.

**To exercise the rights** listed above or for further information, simply send an e-mail to the following address: [press@isaloninautici.com](mailto:press@isaloninautici.com) with the subject line: “exercise of GDPR rights”, and inserting in the body of the mail the right that you wish to exercise. Once they have processed what they have received, the Joint Controllers will send their reply in the terms indicated in Article 12 of the GDPR.

It is our right to refuse to fulfil your request only for one of the following reasons:

- to exercise the right to freedom of expression and information;
- to fulfil legal obligations or to perform a task in the public interest or to exercise official authority;
- for reasons of public health in the public interest;
- for archiving, research or statistical purposes, or to exercise or defend a legal right.

When fulfilling a valid data cancellation request, we will take all measures that can be reasonably implemented to delete the data in question.

The Joint Controllers advise that if they intend to further process the personal data for a different purpose than that for which it was collected, before this further processing they will provide the data subject with information about this different purpose, and any other pertinent information, and collect their specific consent in this case. It is also noted that the Joint Controllers use specific and appropriate policies for the acquisition of data in particular areas to which reference should be made for processing in this case (such as becoming a member of an organisation, or joining a trade fair event, etc.).

Please note that the sending of e-mail by visitors to the addresses indicated on this website, for the purposes specified from time to time, involves the acquisition and subsequent processing of the sender's address and any other personal data inserted in the message in the manner and with the purposes already indicated in the above policy. Sending e-mail in this way will also involve the knowledge and acceptance of the privacy policy.

### **Communications and Newsletters**

The communication service about the Joint Controllers' activities and newsletters is reserved for certain categories of registered users. To provide and manage this service, the Joint Controllers use the services and tools provided by the website [www.mailup.it](http://www.mailup.it). For more information on the processing of personal data by MailUp, the Joint Controllers advise you to carefully consult the following link: [MailUp Privacy](#). Failure to provide personal data will not entail any consequences for the user unless, where they have failed to provide the necessary data, the user is prevented from accessing the services requested by which you can unsubscribe at the foot of every communication.

### **Navigation Data**

The computer systems and software procedures used to operate this website acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols. This data is used solely to gather anonymous statistical information regarding the use of the website and in order to monitor its correct functioning, and is cancelled immediately after being processed. The data could be used to ascertain responsibility in the case of hypothetical computer crimes against the website.

## Cookies

Cookies are small text files that are stored by a website on the user's hard drive, so that they uniquely identify the browser of the website visitor. Cookies do not damage your computer and do not contain viruses. They streamline the analysis of traffic on the Web or signal when a specific website is visited and allow Web applications to send information to individual users.

In the table below, we have listed the cookies relevant to our website; in order to disable them, you need to follow the steps indicated by the service provider.

cookie	type of cookie	duration
_ga	Google Analytics	2 years
_gat	Google Analytics	10 minutes
_gid	Google Analytics	1 day
pll_language	<a href="http://Cellinicaffe.it">Cellinicaffe.it</a> (preference for multilingual)	1 year

PREF	<a href="http://youtube.com">youtube.com</a>	Registers a unique ID that is used by Google to keep statistics of how the visitor uses YouTube videos across different websites.	8 months	HTTP Cookie
VISITOR_INFO1_LIVE	<a href="http://youtube.com">youtube.com</a>	Tries to estimate the users' bandwidth on pages with integrated YouTube videos	179 days	HTTP Cookie
YSC	<a href="http://youtube.com">youtube.com</a>	Registers a unique ID to keep statistics of what videos from YouTube the user has seen.	Session	HTTP Cookie

SAPISID	<a href="http://youtube.com">.youtube.com</a> / <a href="http://google.com">.google.com</a>	2 years
SID	<a href="http://youtube.com">.youtube.com</a> / <a href="http://google.com">.google.com</a>	2 years
SSID	<a href="http://youtube.com">.youtube.com</a> / <a href="http://google.com">.google.com</a>	2 years
CONSENT	<a href="http://youtube.com">.youtube.com</a> / <a href="http://google.com">.google.com</a>	20 years and 1 month

HSID	<a href="#">.youtube.com</a> / <a href="#">.google.com</a>	2 years
APISID	<a href="#">.youtube.com</a> / <a href="#">.google.com</a>	2 years

### **Copyright**

The documentation, texts, images, trademarks and anything else published and reproduced on this website is the property of I Saloni Nautici S.p.A. and UCINA and/or is granted to them by third parties. All contents of this website are protected by the provisions of law on copyright and intellectual property. Any reproduction, even partial and in any form, is forbidden.

### **Responsibility**

No responsibility is assumed by I Saloni Nautici S.p.A. and UCINA in relation both to the content published on this website and the use that third parties may make of it, and to any contamination deriving from access, interconnection, and downloading of material and computer programs from this website.

Therefore, they cannot be held responsible or, in any case or in any capacity, be held to answer for damages, losses or prejudices of any kind that third parties may suffer as a result of contact with this website, or following the use and reliance on information published on it, as well as software used.

The material and information on the website are subject to changes or updates without notice. Although I Saloni Nautici S.p.A. and UCINA take the utmost care when entering information, they do not assume any responsibility regarding the accuracy and completeness of the information provided, the use of which is at the sole risk of the user. By making this information available to the user, I Saloni Nautici S.p.A. and UCINA do not grant any license for copyrights, patents or any other intellectual property rights.

### **Application of the legislation**

By accessing the website and browsing the relevant web pages, the user declares that they are subject to the relevant regulations in force in Italy.

The Saloni Nautici S.p.A. and UCINA regularly check that they comply with these privacy regulations, adapting them from time to time with the new provisions issued. If you have any questions or concerns regarding these privacy regulations, you can contact the Data Controller at any time by writing to: [press@isaloninautici.com](mailto:press@isaloninautici.com).

It is our policy to respond to users who send formal written complaints to this address in order to investigate the reported problem. We are committed to collaborating with the competent authorities to resolve any complaints regarding the transfer of personal data that are not resolved directly between I Saloni Nautici S.p.A. and UCINA, and the private individuals.