

<b>ASIPO SAC</b>	PRIVACY POLICY WEBSITE USERS SECTION	MOD.INF.UT. -PRI Ed. 01/2022
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## Data Protection Policy

### Users Section

**Interprovincial Association of Fruit and Vegetable Producers Società Agricola Cooperativa, with a registered office and data processor in via T. Nuvolari n. 44/a, 43122 Parma, tel. 0521 241005 Fax. 0521 481890, e-mail [asipo@asipo.it](mailto:asipo@asipo.it), pec [asipo@pec.it](mailto:asipo@pec.it) the owner of the website <https://www.asipo.it/> (hereafter, the "Website"), as the data controller of the personal data of users of the Website (hereafter, the "Users") provides below the privacy policy according to Article 13 of EU Regulation 2016/679 of 27 April 2016 (here after, the "Regulation", or the "Applicable Regulations").**

This Website and any services offered through the Website are reserved for persons aged 18 years or over. The Data Controller does not process Personal Data relating to minors. Upon request from these Users, the Data Controller will promptly delete all personal data involuntarily collected and related to minors.

The Data Controller takes the utmost care to protect its Users' right to privacy and personal data. For any information related to this Privacy Policy, Users can **contact the Data Controller** at any time, using the following methods:

- By sending a registered letter with acknowledgement of receipt to the Data Controller's registered office in **via T. Nuvolari n. 44/a, 43122 Parma**;
- By sending an email to the following addresses: **email [asipo@asipo.it](mailto:asipo@asipo.it), pec [asipo@pec.it](mailto:asipo@pec.it)**

### 1. Purposes of the data processing

Users' personal data will be processed lawfully by the Data Controller pursuant to Article 6 of the Regulations for the following processing purposes:

- a) **provision of the Service**, or to allow the User to browse the Site. The User's data collected by the Data Controller to this end includes all personal data whose transmission is implicit in the use of Internet communication protocols, used by the computer systems and software procedures to operate the Website and acquired during their normal functioning: the IP addresses or domain names of the computers utilised by the Users, the addresses in URI (Uniform Resource Identifier) notation of the requested resources, the time of the request, the method applied in submitting the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (positive outcome, error, etc.) and other parameters relating to the operating system and the User's IT environment. This data is used for the sole purpose of obtaining anonymous statistical information on the Website use and to check that it is functioning properly. Without prejudice to the other provisions contained within this Privacy Policy, under no circumstances will the Data Controller make the Users' personal data available to other Users and/or to third parties.

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- b) **process the User's request**: the Users' personal data are collected and processed by the Data Controller for the sole purpose of processing their requests. The User's data collected by the Data Controller for this purpose include name, surname, email, and telephone number entered in the "*contacts*" section. No other data processing will be carried out by the Data Controller concerning the User's personal data. Without prejudice to the other provisions contained within this Privacy Policy, under no circumstances will the Data Controller make the Users' personal data available to other Users and/or to third parties;
- c) **whistleblowing reports**: the data processing in question involves the provision – in person to the Head of the Prevention of Corruption and Transparency, by filling out a form with a specific web procedure – of data such as name, surname, qualification, or professional position, working place, email, telephone as well as additional data and information related to the reported illegal conduct. The personal data provided will be processed exclusively for the investigation of the report.
- d) **reserved area access**: reserved only for ASIPO members and staff. The service provided is used to access communications and documents that the Association uploads to the website reserved for them and to access links to the association's programs (to view the courtesy invoices issued, the sales of the members' products, the compilation of the campaign notebook).
- e) **administrative/accounting purposes**, i.e., to carry out activities of an organisational, administrative, financial, and accounting nature such as internal organisational and functional tasks necessary to fulfil the contractual and pre-contractual obligations.
- f) **legal obligations**, or to comply with obligations according to law, an authority, a regulation, or legislation and to ensure liability in case of hypothetical computer crimes against the Website.
- g) **the execution of a contract**, if the processing is necessary for the realisation of a contract with the User and/or for the carrying out of pre-contractual measures.

However, it is always possible to request the Data Controller to clarify the concrete legal basis of each processing operation and to specify whether the processing is based on law, provided for by a contract or necessary to conclude a contract.

The personal data provided for processing purposes indicated above is optional but necessary since not providing them will make it impossible for the User to make a request to the Data Controller and/or whistleblowing report.

## **2. Data processing and storage methods**

Users' personal data will be processed using manual and IT tools, as strictly necessary to achieve the purpose for which they are processed, and in any event, to ensure confidentiality of the data.

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The personal data of the Website Users will be kept for the time strictly necessary to carry out the primary purposes described above in Section 1) or in any case as according to what is necessary for the protection according to Civil Law of the interests of both the Users and the Data Controller.

### 3. Scope of disclosure and dissemination of data

Users' personal data may also be disclosed to third parties who may process personal data on behalf of the Data Controller as "External Data Processors", such as, for example, IT services and functional providers for the operation of the Website, *outsourcing* or *cloud computing* service providers, professionals, and consultants.

Users have the right to obtain a list of any data processors appointed by the Data Controller by making a request to the Data Controller as indicated in paragraph 5 below.

### 4 . Data transfer

The Data Controller does not transfer personal data to third countries outside the EU area.

Nevertheless, they reserve the right to use cloud services; in this case, the service providers will be selected among those who provide adequate guarantees, as provided by Article 46 GDPR 679/16.

### 5. Rights of data subjects

Users may exercise their rights according to the Applicable Regulations by contacting the Data Controller as follows:

- By sending a registered letter with acknowledgement of receipt to the Data Controller's registered office in **via T. Nuvolari n. 44/a, 43122 Parma;**
- By sending an email to the following addresses: **email [asipo@asipo.it](mailto:asipo@asipo.it), pec [asipo@pec.it](mailto:asipo@pec.it)**

According to the Applicable Regulations, the Data Controller informs that Users have the right to obtain information on (i) the source of their personal data; (ii) the processing purposes and methods; (iii) the logic applied to the processing using electronic tools; (iv) the identity of the Data Controller and the Data Processor; (v) the parties or categories of the parties to whom the personal data may be notified or may gain knowledge of them in their capacity as data processing managers or persons in charge of processing.

Furthermore, Users have a right to:

- a) **access, update, rectify** or, when they have an interest, **integrate** their data;
- b) the **erasure, transformation into anonymous form** or **blocking** of data processed in breach of the law, including data no longer required for the purposes for which they were collected or subsequently processed;
- c) receive confirmation that procedures under letters a) and b) have been brought to the attention, also concerning their content, of those bodies or persons to whom said data has been communicated or disclosed except in the case in which such communication proves impossible or involves means manifestly disproportionate for the right protected.

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Furthermore, Users have:

- a) the right to **withdraw consent** at any time if the data processing is based on their consent;
- b) the right to **data portability** (the right to receive all personal data concerning the Data Subject in a format that is structured, commonly used and readable by automatic devices), the right to **limit** the processing of **personal data** and the **right to deletion** ("right to be forgotten");
- c) the **right to object**, in whole or in part, for legitimate reasons to your personal data processing concerning them, even if pertinent to the purpose of the collection.
- d) if they consider that data processing is in breach of the Regulations, the right **to file a complaint with the Supervisory Authority** (in the Member State in which the Data Subject normally resides, in which they work or in which the alleged violation has occurred). The Italian Supervisory Authority is the **Guarantor for personal data protection**, with offices in Piazza Venezia, n. 11, 00186 – Rome (RM) (<http://www.garanteprivacy.it/>).

For anything not provided for in this policy, please refer to Regulation (EU) 2016/679 to Legislative Decree 196/03 as amended by Legislative Decree 101/2018 and subsequent amendments, as well as any other provision issued by the Guarantor Authority for the Protection of Personal Data ("Guarantor").

The Data Controller is not responsible for updating all links displayed in this Policy, so whenever a link is not functioning and/or updated, Users acknowledge and accept that they must always refer to the document and/or section of the websites referred to by that link. In case of non-acceptance of the changes made to this privacy policy, the Users are required to cease using <https://www.asipo.it/> and may request the Data Controller to remove their Personal Data. Unless otherwise specified, the previous privacy policy shall apply to Personal Data collected up to that point.