



BENACCHIO
GROUP

PRIVACY POLICY

Pursuant to the European Regulation No. 679 of 2016 (the “**Privacy Regulation**”), Benacchio S.r.l. intends to inform you and all users and/or visitors of the site www.benacchio-group.com (respectively the “**Users**” and the “**Site**”), about the use of personal data collected through the Site.

1. Data Controller, Data Processors and Data Protection Officer

The Data Controller for the processing of personal data is Benacchio S.r.l. (P.IVA 01777040245) based in 36050 Cartigliano (VI), Via delle industrie, 98, e-mail privacy@benacchiosrl.it, (hereinafter the “**Data Controller**”).

The updated list of designated Data Processors can be provided upon request by Users by sending a request to the Controller's e-mail address.

In the event that a Data Protection Officer is appointed, on the other hand, the identification data of the same shall be made known by publication of the same, supplementing this information notice.

2. Information collected automatically by the Site

Like all websites, our Site also makes use of log files, in which information collected automatically during your visits is stored. The computer systems and software procedures used to operate the Site automatically acquire certain information during use, the transmission of which is implicit in the use of Internet communication protocols.

The information collected is as follows:

- Internet Protocol (IP) address or the domain name of the device you are using;
- browser type and parameters of the device used to connect to the Site;
- the URI (Uniform Resource Identifier) notation addresses of the resources requested or the method used to submit the request to the server;
- the name of the internet service provider (ISP);
- date and time of visit;
- web page of the User's origin (referral) and exit;
- possibly the number of clicks;
- the size of the file obtained in response;
- the numeric code indicating the status of the response given by the server (successful, error, etc.);
- other parameters relating to the operating system and the computer environment of your device.

This information is processed automatically and collected only in aggregate form for the purpose of verifying the correct operation of the Site.

3. The personal data you provide us by using the Site: what we process them for

We need your data in order to allow you to:

- access the Site and carry out the relevant navigation
- access the services offered therein (e.g. contacts, work with us) as requested by you.

Your data is processed for the following purposes:

(i) to comply with legal obligations;

(ii) to perform the technical administration of the Site;

(iii) to use the communication services with the Controller, the information on which can be found at the following link [<https://www.benacchio-group.com/wp-content/uploads/2024/05/INFORMATION-ON-THE-PROTECTION-OF-PERSONAL-DATA-002.pdf>];

(iv) use the “Work with us” service, to send your spontaneous application and/or apply for a specific open position, as per the specific privacy policy available at the link [<https://www.benacchio-group.com/wp-content/uploads/2024/05/DATA-PROTECTION-NOTICE-FOR-CANDIDATES.pdf>].

The data you provide will be processed mainly by computer under the authority of the Data Controller, by persons specifically appointed, designated and instructed to process them, pursuant to Articles 29 of the Privacy Regulations and 2-quaterdecies of the Privacy Code. Please note that appropriate security measures are also observed pursuant to Articles 5 and 32 of the Privacy Regulation to prevent the loss of data, unlawful or incorrect use and unauthorized access.

4. Nature of the provision of data and legal basis for processing

With reference to the purposes referred to in points (iii) and (iv) of Section 3, please refer to what is expressly indicated in the specific privacy statement referred to in this Privacy Policy.

For the purposes referred to in points (i) and (ii) of Section 3 above, the provision of your personal data is necessary because without them you will not be able to use the services offered by the Site. Consequently, for the purposes referred to in point (i) above, the legal basis for the processing is the fulfilment of legal obligations, pursuant to article 6, paragraph 1, letter c) of the Privacy Regulation, while for the purposes referred to in point (ii) above, the legal basis for the processing is the performance of the services provided through the Site and requested by you, pursuant to article 6, paragraph 1, letter b) of the Privacy Regulation.

Further details on the foregoing are contained in the specific information notices shown or displayed on the Site and prepared for the relevant services on request.

5. To whom and in what context we may transmit your data

Your data may be communicated, within the EU, to external structures, entities and companies (including consultants and service providers) that the Controller uses to manage the Site and to perform activities connected with, instrumental to or consequent to the performance of the services offered by the Site.

Your personal data may also be communicated to the companies of the group to which the Controller belongs.

Further details on the foregoing are contained in the specific information notices shown or displayed on the Site and prepared for the relative services on request.

6. Your rights

You may at any time exercise your rights under Articles 15 et seq. of the Privacy Regulation, for access, rectification, transformation, blocking, deletion, limitation of processing, in the manner and within the limits established by Article 12 of the Privacy Regulation.

The complete model for exercising the rights can be requested by emailing privacy@benacchiosrl.it with instructions for filling it in and sending it to the Data Controller.

In the event of failure to receive a timely response or inadequate response from the undersigned company, or if you believe there has been a violation of the Privacy Code and/or the Privacy Regulation, you may lodge a complaint with the Garantor for the protection of personal data, at the following coordinates: www.garanteprivacy.it, Email: protocollo@gpdp.it, Telephone: (+39) 06.69677.1.

7. Duration of Processing

Without prejudice to legal obligations, personal data will be retained for a specified period, based on criteria based on the nature of the services provided. In particular, navigation data will be kept for a maximum of 7 days.

For further details on the other processing purposes outlined above and governed by specific disclosures, please refer to what is expressly indicated therein.

8. Security measures

Through the Site, your data are processed in compliance with the applicable law and using appropriate security measures in accordance with the regulations in force also pursuant to articles 5 and 32 of the Privacy Regulation.

In this regard, we confirm, among other things, the adoption of appropriate security measures to prevent unauthorised access, theft, disclosure, modification or destruction of your data.

9. Changes to the Privacy Policy

The Controller reserves the right to make changes to this Privacy Policy. In this case you will be promptly informed when you use the Site again.