

Pursuant to art. 13 of the 2016/679 EU Regulation and in relation to the information that will come into possession, for the purposes of the protection of persons and other subjects regarding the processing of data, we inform you as follows:

### INFORMATION COLLECTED BY THE SOCIAL NETWORK PLATFORM

Social networks (Facebook, Youtube, Instagram, Linkedin, Twitter) act as information portals on products supplied by the company, services, events, in-depth analysis, offers and discounts. Social network platforms, used by the company, through the creation of accounts to which the dedicated pages are associated are five: Facebook, Youtube, Instagram, Linkedin and Twitter. These channels operate through the application of privacy policies to which the user accesses and views them with acceptance. So the management of potentially acquirable and processable data takes place directly from the platforms and the user, in this case the company "Michele Dibenedetto & C S.a.s." (hereinafter the company), uses them in the manner and for the purposes explained in this section. The contents shown are intended as an implementation of the privacy policies applied by the social network platforms to which the company holds its own account used exclusively for the presentation of its products and services and for the purposes specified. In this sense, the company, as a legal entity with its own privacy management body in agreement and pursuant to EU Regulation 2016/679 and Legislative Decree 101/2018, is relieved of any actions taken by the platform social networks operators that do not comply with the reference discipline and that can potentially harm the freedom of individuals. The references are therefore reported, which can be consulted at any time and are constantly updated, regarding the privacy policies applied by the social network platforms mentioned:

Facebook: <https://it-it.facebook.com/privacy/explanation> 

Youtube: <https://policies.google.com/privacy?hl=it&gl=it> 

Instagram: <https://help.instagram.com/519522125107875>  

Linkedin: [https://www.linkedin.com/legal/privacy-policy?trk=homepage-basic\\_footer-privacy-policy](https://www.linkedin.com/legal/privacy-policy?trk=homepage-basic_footer-privacy-policy) 

Twitter: <https://twitter.com/it/privacy> 

### PURPOSE OF THE PROCESSING OF COLLECTED DATA

The personal data collected can be used for a variety of purposes:

- 1) purposes related to the supply of products and services;
- 2) purposes aimed at ensuring the legitimate processing of the data and necessary to ensure the user a service that meets needs and expectations.

### LEGAL BASES OF THE TREATMENT

The processing of personal data by socila network platforms is carried out on the basis of measures aimed at fulfilling a legal obligation with the consent given by the interested party, at any time freely revocable. Below are the main cases of use of the user's personal data and the legal bases on which they are based, for activities concerning the "contacts" platform from social networks.

#### ACTIVITIES

#### LEGAL BASES

<b>Management of user requests</b> Data processing to manage requests sent by the user through social networks.	Legitimate interest in offering a good service through the social network.
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<b>Michele Dibenedetto &amp; C. S.a.s.</b> Via Vecchia Madonna dello Sterpeto, 29/31 76121 Barletta (BT)	<b>Social Network Privacy Policy</b> <b>(according to EU General Data Protection</b> <b>Regulation n. 2016/679 and according to Italian</b> <b>Legislative Decree n. 101/2018)</b>	Rev.	00
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<b>Network and information security:</b> Management of the security of the network communication and of the information contained, so as to allow the protection of user data from loss or damage, theft and unauthorized access.	Legal obligation to guarantee the security of the network communication and of the information contained.
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## DATA PROTECTION

The protection of the data collected is achieved, through appropriate security measures, considering the nature, the object, the context, the purposes of the treatment and also the risk of probability and/or seriousness of damage to the rights and freedoms of natural persons. Each personal data is treated in the full respect of the law: subjected to updates and conservation in a time strictly necessary for the supply of the products requested by the interested party, according to the maximum time required by law. The treatment process is carried out in complete safety in order to prevent access to third parties; at the same time the rights of the interested party are guaranteed and never forgotten, of which:

- 1) the right to access personal data;
- 2) the possibility of checking the accuracy of the data concerning him;
- 3) the correction and / or integration of the same;
- 4) the right to cancel or limit the processing or oppose the same;
- 5) the possibility of revoking the consent given also for individual types of processing, as well as guaranteeing the portability of the personal data collected.

## WHAT DATA ARE COLLECTED?

The data collected includes references to:

- 1) Name or nickname;
- 2) E-mail and phone address;
- 3) Message object;

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## TERMS OF STORAGE OF CUSTOMERS DATA

The processing of data is carried out, according to legal obligations, to respond to requests for clarification and/or resolution of any disputes and to protect the legitimate interests of the data controller.

## COMMUNICATION AND DISSEMINATION OF DATA

The data acquired can be communicated to the following subjects:

- ✓ Third parties that need it so that the required products can be supplied: by way of example, the employees involved in the organization of the social network are considered as external subjects (such as third party technical service providers, hosting providers, IT companies, communication agencies);
- ✓ To the third parties when there is an obligation to communicate or share the user's personal data to comply with a legal obligation, to give them application or to investigate, with the judicial police bodies in charge, about true or alleged violations.

## RIGHTS OF CUSTOMERS

At any time, the customer, in according to the articles, from 15 to 22, of EU General Data Protection Regulation n. 2016/679, has the right to:

- 1) access to data, receive a copy of them, as well as further information on the treatments in progress on them;
- 2) request confirmation of the existence of their data;
- 3) correction or updating of data processed, if they are incomplete or out of date;
- 4) cancellation of data from databases if the customer considers the treatment unnecessary or illegitimate;
- 5) obtain information about the purposes of the processing, the categories of data, recipients or categories of recipients to whom the data have been or will be communicated and, when possible, the retention period;
- 6) obtain the limitation of the treatment of data, if the customer considers these are not correct, and necessary or are illegitimately treated;

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- 7) obtain data portability, so receive them from a data controller, in a structured format, commonly used and readable by automatic device, and transmit them to another data controller without any problem;
- 8) revoke the consent at any time without prejudice to the lawfulness of the treatment based on the consent given prior to the revocation;
- 9) oppose the processing of personal data;
- 10) propose a complaint to a supervisory authority;

The rights can be exercised with a written request sent to Data Controller, to the postal address of the registered office or to the email address: [info@dibenedettosas.it](mailto:info@dibenedettosas.it)

## PROTECTION OF MINORS

In order to guarantee the protection of minors, the services rendered by the company that can determine the placement of potential contractual obligations, are reserved to subjects legally "qualified" to pursuant of the relevant legislation, are respected the limits, the methods and criteria for identifying "minor" and "non" subjects. To pursuant to the art. 8, par. 1 of Regulation (EU) 2016/679, a child who has reached the age of sixteen can express his consent to the processing of his personal data. The processing of personal data of the minor under the age of sixteen, based on the art. 6, par. 1, letter a) of Regulation (EU) 2016/679, is permitted on condition that it is provided by the person who exercises parental responsibility (Art. 2 – quinquies). In compliance with the protection of minors, it is necessary to specify that Legislative Decree 101/2018 in implementation of what has already been expressed by EU Regulation 2016/679 has in fact lowered the age limit to fourteen years to request for minors lower the consent of those who exercise parental responsibility.

