



PRIVACY POLICY



## PRIVACY POLICY

INFORMATION PROVIDED PURSUANT TO ARTICLE 13  
OF EU REGULATION 2016/679 (HEREINAFTER “GDPR”)  
AND ARTICLE 13 OF ITALIAN LEGISLATIVE DECREE 196/2003  
“DATA PROTECTION LAW” (HEREINAFTER THE “CODE”)

### (1) GENERAL INFORMATION

The concerned parties of the following general profiles, which apply for all the scopes of the processing, are informed about the following:

- All the data of individuals with whom the Foundation communicates, as well as the data awarded by the Members, are processed in a legitimate, fair and transparent way, in compliance with the general principles set forth by Article 5 of the GDPR and Article 11 of the Code.
- Specific security measures shall be observed to prevent the loss of data, illicit or incorrect uses and unauthorized accesses, in accordance with Article 32 of the GDPR and Article 31 of the Code.

### References and rights of the concerned parties:

- The Data Owner is the undersigned Foundation, in the person of the pro tempore legal representative, who may be contacted (freely through the contact details provided in this site) to exercise all the rights provided for by articles 15-21 of the GDPR and Article 7 of the Code (right of access, modification, cancellation, limitation, portability, opposition), as well to revoke any consent agreed beforehand. Failure to meet its needs shall result in the possibility for the concerned parties to submit a complaint to the Data Protection Supervisory Authority (GDPR – Article 13, second paragraph, letter d).

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## (2) PROCESSING OF DATA CONNECTED TO THE FUNCTIONING OF THIS SITE

### Navigation data

The IT systems and the software procedures aimed at the functioning of this website acquire, during their normal operation, some personal data whose processing is implicit in the use of Internet communication protocols. This information is not collected to be associated with the identified interested parties, but by its very nature they could, through processing and association with data held by third parties, allow users to be identified. This category of data includes IP addresses or the domain names of the computers used by users who connect to the site, the URI (Uniform Resource Identifier) addresses of the resources requested, 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 given by the server (successful, error, etc.) and other parameters relating to the user's operating system and IT environment.

**Purpose and legal basis of the processing**  
(GDPR-Art. 13, paragraph 1, lett. c)

The data subject to processing, such as the identification and contact data indicated in the Application Form, are used for the sole purpose of managing contractual relations and applying the rules of the Implementing Regulation for the subscription and membership to the Packaging Ethical Charter of the Foundation (hereinafter also referred to as the Regulation) and as such do not require any consent (ex GDPR-Article 6, paragraph 1, letter b.).

The data acquired through the Website are used for the sole purpose of obtaining statistical information on the use of the site and to check its correct operation. The data could also be used to ascertain responsibility in the event of hypothetical computer crimes to the detriment of the site (legitimate interests of the owner).

**Scope of communication**  
(GDPR-Art. 13, paragraph 1, lett. e, f)

The data may be processed exclusively by internal staff, duly authorised and trained in data processing (GDPR-Article 29) or by any individuals in charge of the maintenance of the web platform (appointed in this case as external managers) and shall not be communicated to other parties, disseminated or transferred to non-EU countries except as provided for in Point 7 of the Regulation, with regard to the publication of the news of the loss of the title of Ambassador of the Packaging Ethical Charter in relation to the name of the party involved. Only in case of investigation they may be made available to the competent authorities.

**Period of data storage**  
(GDPR-Art. 13, paragraph 2, lett. a)

Data acquired via the website are normally kept for short periods of time, except for any extensions connected with investigative activities. Data relating to the Member conferred for the membership and necessary for the management of the contractual relationship are kept for the entire duration of the contract and subsequently within the terms of the fiscal and accounting laws, for the purpose of possible verifications.

**Awarding**  
(GDPR-Art. 13, paragraph 2, lett. f)

Data are provided by the person concerned when applying for membership, while the data acquired via the web are automatically acquired by the technological systems of the site.

### Cookies

Cookies are short text fragments (letters and/or numbers) that allow the web server to store information on the client (the browser) to be reused during the same visit to the site (session cookies) or later, even after a few days (persistent cookies). Cookies are stored, according to the user's preferences, by the individual browser on the

specific device used (computer, tablet, smartphone). Similar technologies, such as web beacons, transparent GIFs and all forms of local storage introduced with HTML5, may be used to collect information about user behaviour and the use of services. In the remainder of this policy we will refer to cookies and all similar technologies by simply using the term “cookies”.

**Possible types of first part cookies and preferences management methods**

CATEGORY	PURPOSE	MANAGEMENT OF PREFERENCES
Technical navigation cookies or session cookies	Ensuring normal navigation and use of the site	When using the main browsers it is possible to: - Block by default the reception of all (or some) types of cookies - View the analytical list of cookies used - Remove all or some of the cookies installed  For information on how to set individual browsers, see the specific paragraph. Please note that blocking or deleting cookies could compromise the navigability of the site.
Analytical cookies	Collecting information on the number of visitors and pages viewed	
Technical functional cookies	Allowing navigation according to a set of selected criteria	
Profiling cookie	Creating user profiles in order to send advertisements in line with preferences	

The site may contain links to third-party sites and third-party cookies. For more information, please see the privacy policies of any linked sites.

**Management of preferences through the main browsers.**

Users can decide whether or not to accept cookies by using their browser settings (please note that, by default, almost all web browsers are set to automatically “accept cookies”). The setting can be changed and defined specifically for different websites and web applications. Moreover, the best browsers allow different settings for ‘proprietary’ and ‘third-party’ cookies. Usually, the configuration of cookies is done from the menu “Preferences”, “Tools” or “Options”.

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### Specific services

Contractual documentation such as the Application Form contains data collection forms and requests for data aimed at ensuring the performance of the Contract by the Member.

The site may contain data collection forms aimed at ensuring the surfer possible services/functions (e.g. request information, registrations, etc.).

<b>Purpose and legal basis of the processing</b> (GDPR-Art. 13, paragraph 1, lett. c)	Identification and contact data necessary to reply to requests from interested parties may be requested. The sending of the request is subject to specific, free and informed consent (GDPR-Art. 6, paragraph 1, lett. a).
<b>Scope of application</b> (GDPR-Art. 13, paragraph 1, lett. e, f)	Data are processed exclusively by duly authorised and trained personnel (GDPR-Article 29) or by any individuals responsible for the maintenance of the web platform or the provision of the service (appointed in this case as external managers). Data will not be disseminated or transferred to non-EU countries.
<b>Period of data storage</b> (GDPR-Art. 13, paragraph 2, lett. a)	Data are kept for a period of time compatible with the purpose of collection.
<b>Awarding</b> (GDPR-Art. 13, paragraph 2, lett. f)	The provision of data in the compulsory fields is necessary in order to be able to get a reply, while optional fields are intended to provide the staff with additional information to facilitate contact.

### Data provided voluntarily by the user

The optional, explicit and voluntary sending of electronic and/or ordinary mail to the addresses indicated on this site shall entail the subsequent acquisition of the sender's address, which is necessary in order to reply to requests, as well as any other personal data included in the message.

## (3) DATA PROCESSING IN CONNECTION WITH THE ESTABLISHED RELATIONS

### 3.1 Purpose of data processing

The Foundation shall process personal data identifying the Members provided with the Application Form and used for the purposes of implementing the Regulation.

### 3.2 Purpose and legal basis for processing

Data are processed for the following purposes:

- To conclude contractual relationships.
- To fulfil pre-contractual, contractual and fiscal obligations arising from existing relationships, as well as to manage the necessary communications related to them.
- To fulfil the obligations provided for by law, by the Regulation, by Community legislation or by an order of the Authority.

- To exercise a legitimate interest as well as a right of the Controller (for example: the right of defence in court, the protection of credit positions; ordinary internal operational, managerial and accounting requirements).

Failure to provide such data shall result in the impossibility to establish a relationship with the Controller. The aforementioned purposes represent, pursuant to Art. 6, paragraphs b, c, f, suitable legal bases for the lawfulness of the processing. If it is intended to carry out processing for different purposes, specific consent shall be requested to the concerned parties.

### **3.3 Methods of processing**

The processing of personal data is carried out by means of the operations indicated in Art. 4 n. 2) of the GDPR and precisely: collection, recording, organisation, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, cancellation and destruction of data. Personal data shall be subject to both paper and electronic and/or automated processing. The Data Controller shall process personal data for the time necessary to fulfil the purposes for which they were collected and the related legal obligations.

### **3.4 Scope of processing**

The data are processed by duly authorised and trained internal individuals pursuant to Art. 29 of the GDPR. It is also possible to request the scope of communication of personal data, obtaining precise indications on any external individuals who operate as autonomous Data Processors or Data Controllers (consultants, technicians, banks, transporters, etc.).

## **(4) POLICY UPDATE**

Please note that this policy may be subject to periodic revision, also in relation to the reference legislation and case law. In the event of significant changes, appropriate information will be posted on the home page of the website for a reasonable period of time. In any case, the interested party is invited to periodically consult this policy.

Data .....

Signature .....



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