

VERSION 1.0 dated 25/04/2018

“PRIVACY & COOKIES WEBSITE POLICY” jet.spencer.it

Information provided by Spencer Italia S.r.l. a socio unico, according to and for the purposes of the ex Article 13 of the EU Regulation 679/2016 and the Article 13 of the Legislative Decree 196/2003 (Privacy Code)

1. PREMISE

In compliance with the EU Regulation 679/2016, we hereby provide the necessary information regarding the purposes and the methods used for processing the personal data of those who consult the company website's pages of the **Spencer Italia S.r.l. a socio unico (jet.spencer.it)**, as the owner of the data processing methods (later Data Controller).

This information is valid only for this particular website (**jet.spencer.it**) and not for any other websites that may be consulted by accessing the links published on this site; the data controller is not to be considered in any way responsible for such third-party websites.

The Users are informed that the hosting of this website is provided by the company Amazon Web Services Inc, with registered office in Via 410 Terry Ave North a Seattle WA 98109-5210, United States.

2. TYPES OF PROCESSED DATA

Navigation data

Only with regard to the technical aspects and protocols, we wish to inform you that:

- The computer systems and software procedures used to operate this website may acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols.
- This information is not collected with the purpose to be associated with specific interested third parties, but they might, by their very nature, allow the user's identification, through data processing and various associations with data held by third parties.
- This category of data includes IP addresses or the domain names of the computers that the Users utilize in order to connect to the site, the addresses contained in the URI (Uniform Resource Identifier), notation of the requested resources, 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 (success, error, etc.), and other parameters related to the operating system and the User's IT environment.
- These data can be used to ascertain the responsibility in case of hypothetical computer crimes against the site.

Cookies

Cookies are small text files that are sent from the visited website to the User's device (usually to the browser), where they are mostly stored in order to recognize this device at the next visit. In fact, at every subsequent visit, cookies are re-sent to the site by the User's device.

Each cookie generally contains: the name of the server from which the cookie was sent, the expiration date and a value, usually a unique number randomly generated by the computer. The server of the website that transfers the cookie uses this number in order to recognize the User when he returns to visit a site or when he browses from one page to another.

The cookies can be installed not only by the website's owner when the User visits their website (first-party cookies), but also by a different site that installs cookies through the first site (third-party cookies) and is able to recognize them. This happens because a visited site may contain elements (images, maps, sounds, links to web pages that belong to other domains, etc) hosted on other servers than the server of the visited site.

Generally, cookies can be classified into different typologies based on the following criteria:

A. Duration:

- session cookies (temporary) which are automatically deleted when the browser is closed.
- persistent cookies which are active until their expiration date or until they are canceled by the user.

B. Origin:

- first-party cookies which are sent to the browser directly from the site that is being visited.
- third-party cookies which are sent to the browser from other sites and not from the site you are visiting.

C. Purpose

- technical cookies
 - navigation / indispensable / performance / process / security cookies contribute to the operating of the website, giving, for example, the possibility to browse through the pages or access protected areas. If the cookies are blocked, the site can not function properly.
 - functionality / preferences / localization / session status cookies allow the storage of information that changes the appearance or the behavior of the site (preferred language, texts size and characters size, geographical area where the User is located). If these cookies are blocked, the experience is less functional but not fully compromised.
 - statistical / analytic a) first-party or b) third-party cookies with IP masking, without data crossing (similar to technical cookie, purpose wise), are used to collect information and generate statistics of website usage in order to understand how visitors interaction works.
- non-technical cookie

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- third-party statistical / analytic cookies without IP masking, with data crossing, are used to collect information, generate usage statistics, with possible identification and tracking of the website User, in order to understand how visitors interact.
- profiling / publicity / advertising / tracking / conversion cookies for advertising selection, based on what is relevant for a specific User (personalized ads). Profiling cookies are designed to create specific profiles for Users and are then used in order to send advertising messages aligned with the preferences expressed by the same User during his net surfing experience.

Spencer Italia S.r.l. a socio unico, has implemented the obligations prescribed by the Personal Data Protection Authority [Identification of the simplified procedures for information and consent acquisition for cookies use - May 8th, 2014](#) (Published in the Official Journal No. 126 of June 3rd, 2014) ", with subsequent interventions regarding "cookies", amended by the Guarantor Authority.

All information regarding the cookies installed through this site, and the necessary instructions on how to manage the relative User preferences are reported below.

Spencer Italia S.r.l. a socio unico wishes to inform their Users that the site (jet.spencer.it) may be using the following types of cookies:

- First Party Technical Cookies, which do not require the User's consent;
- Third Party Analytical Cookies, assimilated to technical cookies because various types of tools that reduce the cookies' identifying power have been adopted (by masking significant portions of the IP address) and, the third parties do not cross the information collected with other information that they already have.
- Profiling cookies.

To be specific, in addition to what was previously indicated, we hereby report that the website (jet.spencer.it) uses:

- **First-party technical cookies**

These cookies are necessary for the proper functioning of our website: these are the cookies that are used for browsing or to provide a service which has been requested by the User; they are never used for other purposes and they are installed directly by the Data Controller. Without the use of these cookies, some operations could not be performed or they would far be more complex and / or less secure. Below is a brief description of this type of cookies that are used by our website:

Name	Function	Duration
CookieConsent	Stores the status of the user's cookie consent for the current domain	1 year

- **Third-party analytical cookies, assimilated to technical cookies**

Our website uses third-party cookies for statistics' management. In particular, our website uses Google Analytics: this is a web analytic service provided by Google Inc. ("Google") who uses the cookies stored on the User's computer in order to allow statistical analysis in an aggregated form, as per the visited website. Please note that there are tools which have been adopted in order to reduce the identifying power of the cookies (by masking significant portions of the IP address) and the third parties do not cross the collected information with other information which is already available. For this type of cookies we provide the name of the third parties that are managing it, and the link to the page where the User can receive information related to these cookies' treatment and express their consent. Below is a brief description of this type of cookies that are used by our website:

Name	Function	Duration	Third Party	Link to the Third Party's Privacy Policy
_ga	Registers a unique ID that is used to generate statistical data on how the visitor uses the web site.	2 years	Google LLC	https://policies.google.com/privacy/update?hl=it
_gid	Registers a unique ID that is used to generate statistical data on how the visitor uses the web site.	Session	Google LLC	https://policies.google.com/privacy/update?hl=it

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_gat	<i>Used by Google Analytics to throttle request rate</i>	Session	Google LLC	https://policies.google.com/privacy/update?hl=it
_utm.gif	<i>Google Analytics Tracking Code that logs details about the visitor's browser and computer.</i>	Session	Google LLC	https://policies.google.com/privacy/update?hl=it
_utma	<i>Collects data on the number of times a user has visited the web site as well as dates for the first and most recent visit. Used by Google Analytics.</i>	2 years	Google LLC	https://policies.google.com/privacy/update?hl=it
_utmb	<i>Registers a timestamp with the exact time of when the user accessed the web site. Used by Google Analytics to calculate the duration of a web site visit.</i>	Session	Google LLC	https://policies.google.com/privacy/update?hl=it
_utmc	<i>Registers a timestamp with the exact time of when the user accessed the web site. Used by Google Analytics to calculate the duration of a web site visit.</i>	Session	Google LLC	https://policies.google.com/privacy/update?hl=it
_utmt	<i>Used to throttle the speed of requests to the server.</i>	Session	Google LLC	https://policies.google.com/privacy/update?hl=it
_utmz	<i>Collects data on where the user came from, what search engine was used, what link was</i>	6 months	Google LLC	https://policies.google.com/privacy/update?hl=it

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	<p>clicked and what search term was used. Used by Google Analytics.</p>			
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Profiling cookies

Finally, we inform Users that the website uses the so-called "Profiling" cookies exclusively by third parties. Profiling cookies are designed to create specific profiles for users and are then used in order to send advertising messages aligned with the preferences expressed by the same user during his net surfing experience. Below is a list of "Profiling" c.d. cookies of third parties, which are currently used by the website, with the indication of their name, the function they perform and their duration:

Name	Function	Duration	Third Party	Link to the Third Party's Privacy Policy
ads/ga-audiences	Used by Google AdWords to re-engage visitors that are likely to convert to customers based on the visitor's on line behaviour across web sites.	Session	Google LLC	https://policies.google.com/privacy/update?hl=it
collect	Used to send data to Google Analytics about the visitor's device and behaviour. Tracks the visitor across devices and marketing channels.	Session	Google LLC	https://policies.google.com/privacy/update?hl=it

Social network buttons

The Social Network Buttons are the buttons available on the website, depicting the icons of social networks (eg Facebook, Twitter, etc...) and allow the users who are browsing to interact directly with the social platforms with only one click. The Social Buttons used by the site (jet.spencer.it) are in fact links to the social network accounts owned by the Data Controller. Therefore, through the use of these buttons, third-party cookies are not installed through our site. However, we provide references for the Social Network Buttons used by the site (jet.spencer.it) and also the links where the User can view the data management's privacy policy regarding the social networks to which the buttons refer to.

No social network buttons are used in this site

In general, besides the types of cookies used by this website, we wish to also inform our Users that, in addition to the protection required by the current legislation, also options to browse without cookies are available, such as:

- Block third-party cookies: third-party cookies are generally not essential for browsing, so you can reject them by default, by using the adequate functions of your browser.
- Activate the Do Not Track option: the Do Not Track option is available in most of the latest generation browsers. Web sites that were designed to respect this option, once it is activated, should automatically stop collecting some browsing data. As mentioned before, however, not all websites are set to respect this option (discretionary).
- Activate the "anonymous browsing" mode: this function allows you to browse without leaving a trace in the navigation data browser. The sites will not remember the User, the pages that are visited will not be stored in the history, and the new cookies will be deleted. The anonymous browsing function does not guarantee

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anonymity on the Internet, because it is only used in order not to keep the browsing data in your browser, thus navigation data will continue to be available to web site managers and connectivity providers.

- Delete cookies directly: there are special functions to do it in all browsers. Remember, however, that every time you connect to the Internet, new cookies are downloaded, so the deletion operation should be performed periodically. Should you wish to have the cookies deleted, you must know that some browsers offer automated systems for the periodic cancellation of cookies.

For any further needs or for further information regarding the so-called "Cookies", we recommend that you consult the following link: <http://www.garanteprivacy.it/cookie>

Besides, in order to find out how to limit, block and / or remove cookies set on your device, please visit the following link: <http://www.aboutcookies.org>

As previously mentioned, the User can also manage his own cookie preferences directly through his browser. In order to know the browser type and browser version that you are using, it is advisable to click on the "Help" button in the browser window at the top, it is where you can access all the necessary information. If, on the other hand, you know the browser type and the browser version that you are using, just click on the adequate link, corresponding to the browser you are using in order to access the cookie management page.

- **Microsoft Internet Explorer**
<http://windows.microsoft.com/en-us/windows-vista/block-or-allow-cookies>
- **Google Chrome**
<https://support.google.com/accounts/answer/61416?hl=it>
- **Mozilla Firefox**
<http://support.mozilla.org/en-US/kb/Enabling%20and%20disabling%20cookies>
- **Safari**
<http://www.apple.com/legal/privacy/>

Finally, for more information on how cookies should be managed, we recommend that you visit the following web pages: <http://www.youronlinechoices.eu> , <http://www.allaboutcookies.org> , <https://tools.google.com/dlpage/gaoptout> , <http://aboutads.info/choices> , <http://www.networkadvertising.org/choices> .

Data provided voluntarily by the User.

Pursuant to the consultation of this site, various data related to identified or identifiable persons may be processed. In particular, it is specified that such processing may occur in relation to personal data freely provided by Users who have sent their data to the data controller through the contact details present on the website (jet.spencer.it), such as, for example, company e-mail addresses, and / or derived from filling out specific forms for collecting information available on the site. In fact, the optional, explicit and voluntary sending of e-mails to the addresses indicated on this website entails the subsequent acquisition of the sender's address, necessary for the purpose of responding to their requests, as well as the acquisition of any other personal data included in the message. Detailed, informative specifications regarding data processing according to the art. 13 of the EU Regulation 679/2016 are, from time to time, reported in the pages that contain visitor's data collection modules. This information is intended to define the limits, purposes and methods of data processing for each data collection form and therefore, each visitor can freely express their consent and authorize the collection of data and the subsequent use.

It should be noted that, for neither section of the site nor for granting access to any functionality of the site, no "special categories of personal data" and / or "personal data relating to criminal convictions and crimes" is required, as defined by the articles 9 and 10 of the EU Regulation 679/2016; if, however, the User spontaneously sends such data to the Data Controller, the Data Controller will process all information of the aforementioned type in compliance with the current legislation regarding the protection of personal data (EU Regulation 679/2016), and limited to what is strictly necessary in relation to the specific requests of the interested User.

In general, with respect to the data provided voluntarily by the User, we wish to inform Users that the EU Regulation 679/2016 (and the Legislative Decree no. 196/2003) provide for the protection of individuals with regard to the processing of personal data. According to this legislation, the personal data processing will be based on correctness, lawfulness and transparency principles, firstly protecting your privacy and your rights.

According to the aforementioned article 13 of the EU Regulation 679/2016 and the Legislative Decree no. 196/2003, we provide you with the following information:

- a) The personal data processing that the Data Controller may perform, will be carried out through an automated process and / or based on paper documents' collection.
- b) the User is free to provide his own information by sending it to the Data Controller via the contact details fields on the website (jet.spencer.it) and / or by filling out specific forms for collecting information available on the site; in the latter case, failure to provide certain data could, depending on the case, could make it impossible to proceed with the activities requested by the User (for example, see "mandatory fields" marked with << * >> within the information collection forms).
- c) the User's personal data will be processed by subjects specifically appointed by the data controller as Data Control Responsible and / or by anyone acting under his authority and having access to personal data; these subjects will only process your data when it will be required and only when performing actions related to the purpose of conferment for the tasks assigned to them by the Data Controller, undertaking to only process the necessary data for carrying out these tasks and to perform only the necessary operations, required for the completion of these tasks.

Furthermore, personal data may be disclosed to third parties only if this is strictly necessary in order to provide specific services or information requested by the User.

Finally, we point out that the Data Controller may use internal or external IT technicians for occasional maintenance, website updating or assistance, in case of malfunctioning. No data deriving from the web service will, however, be communicated or disseminated outside the company.

All communications regarding the above mentioned data are strictly connected to normal business operations in the context of the User Experience and relationship management, when strictly required, for the specific purposes they were initially provided for;

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- c1)** the Data Controller may transfer personal data to a third party country or an international organization; in these cases the Data Controller undertakes to carry out the processing only based upon appropriate guarantees;
- c2)** in compliance with the provisions indicated within the "Measures and precautions prescribed to the Data Controllers with regards to the processing of their functions as system administrators and relative assignment by means of electronic instruments - November 27th, 2008" (Official Journal No. 300 of December 24th, 2008) with subsequent changes and amendments, the data controller may appoint specific "**System Administrators**" who might, while performing their functions, even indirectly, have access to services or systems that process or allow the processing of personal information.
- c3)** the data will not be disclosed to other third parties, if the express consent of the User was not obtained, in advance.
- Your personal data will not be disseminated.**
- d)** The data will be stored for as long as it is necessary in order to achieve the purposes for which the data were initially provided for; The data will be stored in a form that allows the identification of the user concerned for a time period not exceeding the necessary framework of their collection or subsequent processing purposes; afterwards, if not expressly once again confirmed by the interested party, that relative personal data will be deleted, unless transformed into anonymous data.
- e)** The personal data provided will not be processed in order to implement an automated decision-making process (the so-called profiling).
- f)** In the hypothesis in which the personal data provided must be processed for other purposes than the ones indicated above, the Data Controller will inform the User regarding this different purpose and will provide any other relevant information.

Considering the state of the art and the implementation costs as well as the nature, scope, context and purpose of the personal data processing, both when it is determining the processing means, and at the time of the processing itself (the so-called risk analysis-accountability), the Data Controller has to put in place the adequate technical and organizational measures, aimed at effectively implementing the data protection principles, and integrating the necessary guarantees in order to meet the requirements of the EU Regulation 679/2016 and protect the rights of the interested parties.

Data will be processed by using the suitable methods and instruments in order to guarantee security (Article 24, 25 and 32 of the EU Regulation 679/2016) and will be carried out through an automated process and through non-automated means (paper archives), to which all technical and organizational measures must be applied in order to ensure an appropriate security level for the relative risk, so as to ensure, on a permanent basis, their confidentiality, integrity, availability and resilience of the processing systems and services (by way of example but not limited to: control of tasks' assignment to the Data Processing Responsible, and on the data classification itself; procedures, if sustainable, pseudonymisation and encryption, disaster recovery mechanisms, etc.).

We inform you that the processing of data is based on the provisions of art. 6, paragraph 1, letter a) of the EU Regulation 679/2016, and the User is free to provide his own information by sending it to the Data Controller via the contact details fields on the website (jet.spencer.it) and / or by filling out specific forms for collecting information available on the site; in the latter case, failure to provide certain data could, depending on the case, make it impossible to proceed with the activities requested by the User (for example, see "mandatory fields" marked with << * >> within the information collection forms).

The **Data Controller** is: **Spencer Italia S.r.l. a socio unico**, with headquarters in Via Provinciale, 12 - 43038, on Sala Baganza (PR), Fiscal Code - VAT Number IT01633870348, Phone: IT01633870348, Fax 0039 0521 541222, E-mail privacy@spencer.it, CEM (Certified Electronic Mail) spencer@pec.it

Pursuant to the art. 28 of the EU Regulation 679/2016, the Data Controller may use third parties who would process data on their behalf, formally appointed as Data Controllers. The complete and updated list of data processors appointed by the Data Controller will be provided to the User upon request, after sending a written communication in this regard to the addresses indicated above.

According to the art. 29 of the EU Regulation 679/2016, the Data Controller may use anyone acting under his authority and / or under the authority of the appointed manager; these subjects will be adequately trained.

The Data Controller has not designated the D.P.O. (Data Protection Officer) (Article 37 of the EU Regulation 679/2016 and the Article 29 of the WP Guidelines issued on December 13th, 2016), as it is an unnecessary figure within the structure, given that the characteristics of the data processing do not fall within the cases referred to in the aforementioned Article 37.

The Data Controller also informs that:

- g)** the interested party (the User) has the right to ask the Data Controller to provide access to their personal data and the means to correct it, or cancel it, or limit its processing or to refuse their processing, in addition to the data portability right (Article 15, 16, 17, 18, 20 of the EU Regulation 679/2016); while exercising their access rights, the interested party / User has the right to obtain from the Data Controller the confirmation that his personal data is or is not currently subjected to data processing, while exercising the data portability right allows the interested party to obtain from the Data Controller the personal data in object, in a common, readable and structured format, or the transfer of such data from the original Data Controller to another (see WP 242 issued on December 13th, 2016);
- h)** in case that the data processing is based on the article 6, paragraph 1, letter a) or on article 9, paragraph 2, letter a), the interested party has the right to withdraw his consent for personal data processing at any time, without jeopardizing the lawfulness of the data processing occurred on the basis of the given consent, before the revocation;
- i)** the interested party has the right to file a complaint towards a supervisory authority;
- j)** the interested party has the right to be informed, by the care of the Data Controller, without justified delay, regarding the fact that a violation of personal data is likely to present a high risk for the individual human rights and individual freedoms (art. 34 of the EU Regulation / 679/2016).

The full text of the articles of the EU Regulation 679/2016 related to individual rights (articles 15 to 23 inclusively) are available at any time at the following link on the website of the Personal Data Protection Authority:

- <http://194.242.234.211/documents/10160/0/Regolamento+UE+2016+679.+Con+riferimenti+ai+considerando>

or, alternatively, the data controller will provide this information upon User's request, by sending a communication to the previously indicated addresses.

3. CHANGES TO THE "PRIVACY & COOKIES POLICY" DOCUMENT

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The data controller reserves the right to make changes to this Privacy & Cookies Policy, at any time, by publicly sharing it to the Users, on this web page. Therefore, we kindly ask the Users to frequently consult this page, and take as reference the date of the last modification indicated at the bottom.

The Users will be in the position to be able to understand and evaluate the changes made to this document by comparing it to the different versions of the information that may have occurred over time, because the previous versions of the document will still be available for Users' consultation on the website.

In case that the User does not accept the changes made to this privacy statement, he is required to cease using this website and to send the specific, relative communication to the data controller, at the previously indicated addresses, requesting the deletion of their personal data.

Unless otherwise specified, this Privacy & Cookies Policy will continue to be applicable to all previously collected personal data.

For any questions, comments and requests related to this privacy statement, please contact us at the following addresses:

E-MAIL privacy@spencer.it – FAX 00390521541222

In any case, we invite our Users to report any difficulties they encountered in viewing this Privacy & Cookies Policy, in order to be able to provide, if necessary, alternative information methods.

Date of last modification 18/05/2018