

# VERTIGO

## Privacy Notice

### Italian Law no. 196/2003 - Protection and processing of personal data

#### Cookie policy

This Cookie Policy describes the ways in which cookies are used by Michele Chiarlo S.R.L., proprietor of Resort Palas Cerequio in La Morra and manager of the Vertigo on-line wine store ([www.vertigobarolobackvintages.com](http://www.vertigobarolobackvintages.com)). It also performs the function for users of the website of privacy notice pursuant to art. 13 of Italian Legislative Decree no. 196/2003, in compliance with Italian Data Protection Authority General Provision no. 229 of 8 May 2014.

Michele Chiarlo S.R.L. processes personal data in keeping and compliance with current Italian Privacy Law (Personal Data Protection Act no. 196/2003). The processing of personal data is understood as meaning its collection, recording, organisation, storage, processing, editing, selection, extraction, comparison, use, interconnection, blocking, communication, dissemination, erasure or destruction, or a combination or two or more of these operations. Pursuant to art. 13 of the Law, users are advised that the processing of personal data relating to them will be based on principles of integrity, legality, transparency and the protection of their confidentiality and rights.

The following data will need to be collected in order to respond to requests for information and/or purchases on line: the user's first and last names, address, e-mail address, telephone number, tax code and Vat number (only if an invoice is required by holders of Vat numbers). As it is required for the fulfilment of pre-contract, contract, regulation and tax obligations, failure to provide any of this data will result in it being impossible to supply the goods or perform the service. The processing will be carried out in an automated and/or manual form, using methods and tools designed to guarantee the utmost security and confidentiality, and in compliance with the provisions of art. 31 and subsequent articles of Law 196/03. The data will be stored no longer than is necessary for the purposes for which it has been collected and subsequently processed.

The data provided will be handled for the following purposes:

- to perform the service and/or supply the products you purchase;
- in relation to contractual, pre-contractual and legal obligations, exclusively for administrative and accounting purposes;
- for operational, regulatory, tax and management requirements.

The data may be communicated to third parties, such as associates, consultants, sales representatives, transporters, partners, credit institutes or other parties only if strictly connected with the performance of relations.

#### Browsing data

When users visit our website they are anonymous. During the course of normal operation, the IT systems and software procedures operating the site acquire some personal data whose transmission is implicit in the use of Internet communication protocols. This information is not collected to be associated with identified data subjects, but by its very nature it could allow users to be identified through processing and association with data held by third parties. This category of data includes, for example, IP addresses or the domain names of users' computers, operating system parameters, etc. This data is used for the sole purpose of obtaining anonymous

statistical information on the use of the site and verifying its correct operation. The data could finally be used by the relevant authorities for the establishment of responsibility in the event of hypothetical IT crimes against the site.

## **Information notice on cookies**

### *What are cookies?*

Cookies are small data files sent by a website to a user's browser and then stored on the hard disk of the user's computer. Every time the user returns to the same website, the browser sends these cookies back to enable the administrator of the site to offer a tailored experience that reflects the user's interests and preferences, facilitating access to the services on offer. Our site only uses technical cookies which allow access to the functions offered by the site, some of which could not be accessed otherwise. These cookies allow us to provide the requested services, and to remember settings in order to improve the user's visit to our website.

#### *1. TECHNICAL COOKIES*

These are necessary for the website to operated correctly and enable browsing. Without them, pages might not be displayed correctly, and some services could be unusable. A technical cookie is needed, for example, to keep a user connected throughout a visit to a website, or to store language, display etc. settings.

Technical cookies can be divided into: navigation cookies, analytics cookies and functionality cookies.

Navigation cookies ensure normal browsing and use of the website (for example, making purchases, authentication for access to restricted areas).

Analytics cookies are similar to technical cookies only when they are used directly by the site manager to gather information in aggregate form on the number of users and how they visit the site;

Functionality cookies enable users to navigate based on a series of selected criteria (language, products selected for purchase, etc.) in order to improve the service provided.

#### *2. PROFILING COOKIES*

These are used to profile users, so that advertising messages can be sent to the user's computer in line with the preferences already demonstrated by the users when browsing.

#### *3. THIRD PARTY COOKIES*

These are generated and managed by a different organisation to the owner of the website the user is visiting.

All cookies can also be classified into the following categories:

- session cookies, which are deleted when the browser is closed;
- persistent cookies, which stay in the browser until their expiry date.

The latter are used, for example, to recognize the device connecting to the website, making authentication of the user easier.

### *Features and purposes of the cookies installed by the site*

#### **Technical cookies:**

These cookies are used specifically in order to enable correct operation of the website and use of the services it offers. Technical cookies are used, for example, for user login. They mainly come from the Vertigo on-line wine store's own servers, but they may be set by third parties in the case of additional services provided, for example, by social networks. This site uses so-called "technical"

cookies in accordance with the provisions of art. 122, sub 1, of the Law for the sole purpose of "*carrying out the transmission of a communication over an electronic network, or to the extent that is strictly necessary for the provider of a service which has been explicitly requested by the user in order to provide that service*". In this case they can be classified as *navigation or session cookies*, which ensure normal browsing and use of the website (making it possible, for example, to complete a purchase or access restricted areas).

### ***How to give or withdraw consent***

Consent to the use of cookies is given initially by clicking on the "ok" button in the banner on the home page of our website.

### **Third party sites**

The third party sites which can be accessed via this website are not covered by this information notice. Michele Chiarlo S.R.L. will accept no liability in relation to these sites. The categories of cookies they use and their processing of personal data are regulated in conformity with their own information notices.

### ***Browser setting options relating to the use of cookies by the site***

All cookies - whether from first or third parties - can be disabled via the settings of the browser being used; it should be noted, however, that this could make the sites unusable if any cookies are disabled which are essential for their functionality. The settings for disabling cookies are different for each browser; the following are instructions on how to disable cookies in the most popular browsers.

#### ***Firefox:***

1. Open Firefox
2. Press the "Alt" key
3. Select "Tools", and then "Options" on the tool bar at the top of the browser
4. Select the "Privacy" panel
5. Go to "History Settings", and then "Use custom settings". Deselect "Accept cookies from sites" and save your preferences.

#### ***Internet Explorer:***

1. Open Internet Explorer
2. Click on the "Tools" button, then "Internet Options"
3. Select the "Privacy" tab, then move the slide bar to the level of privacy you want to set (at the top it will block all cookies, and at the bottom it will allow them all)
4. Then click on OK

#### ***Google Chrome:***

1. Open Google Chrome
2. Click on the "Tools" icon
3. Select "Settings", and then "Advanced settings"
4. Select "Content settings" under "Privacy"

5. Deselect cookies in the “Cookies” panel, and save your preferences.

**Safari:**

1. Open Safari
2. Select “Preferences” in the tool bar, then click on the “Security” tab
3. Under “Accept cookies” you can choose if and when Safari should save cookies from websites. For further information, click on the question mark button for Help
4. For further information on the cookies stored on your computer, click on “Show cookies”
5. You can deselect cookies in the “Cookies” panel, and save your preferences.

**Art. 7. Right of access to personal data and other rights**

*1. Data subjects have the right to obtain confirmation of the existence of any personal data relating to them, whether it has already been recorded or not, and its communication in an intelligible form.*

*2. Data subjects have the right to be informed of: a) the source of the personal data; b) the purposes and methods of its processing; c) the criteria applied in the event of processing being carried out by electronic means; d) the ID details of the data controller, data processors and representative appointed pursuant to article 5, sub 2; e) the parties or categories of parties to whom the personal data may be communicated or who may become aware of the data in their capacity as country representative, processor or appointee.*

*3. Data subjects have the right to obtain: a) the updating, correction and - if interested - addition of data; b) the erasure, anonymization or blocking of data processed in breach of the law, including data which does not need to be stored for the purposes for which it was collected or subsequently processed; c) certification that the operations under (a) and (b), including their content, have been brought to the attention of those to whom the data has been communicated or disseminated, unless this proves to be impossible or entails the use of means which are clearly disproportionate in relation to the protected right.*

*4. Data subjects have the right to object, wholly or partially: a) on legitimate grounds to the processing of personal data concerning them, even if it is relevant to the purpose of the collection; b) to the processing of personal data concerning them for the purpose of sending advertising material, direct sales, market research or commercial communications.*

**Data provided voluntarily by the user.** Personal data is only supplied by users to the site in the event of “contact requests” or purchases, and is used for correspondence. The optional, voluntary, express sending of e-mail to the addresses given on this site entails the subsequent acquisition of the sender’s address, which is required for responding to requests, as well as of any other personal data given in the mail.

**Data Controllers and Processors.** The Controller and Processor of the personal data is Michele Chiarlo S.R.L. c/o Palas Cerequio – Barolo Cru Resort - Borgata Cerquio, La Morra (CN), who can be contacted at any time to exercise the rights data subjects are entitled to vis-à-vis the Data Controller pursuant to art. 7 of the Data Protection Act (ex art. 13 of law no. 675/1996).