Privacy and Cookie Policy

**Policy governing the processing of personal data of website users pursuant to Article 13 of Regulation EU**

This document was prepared pursuant to Article 13 of Regulation EU 2016/679 (hereinafter the “Regulation”) to allow users to become acquainted with our privacy policy, to understand how their personal data are handled when they use our site ([outlet.woodco.it](http://outlet.woodco.it), hereinafter the “Site”) and, if appropriate, to provide their express and informed consent to the processing of their personal data. The information and data provided by the users or otherwise collected when they use the navigation services and services to access the Site restricted area (hereinafter the “Services”) will be processed in compliance with the Regulation provisions and confidentiality requirements guiding Woodco’s business.
 In accordance with the Regulation provisions, data processing operations carried out by Woodco will comply with the principles of lawfulness, fairness, transparency, restriction of purposes and retention, data minimisation, accuracy, integrity and confidentiality, as well as the principle of accountability as under Article 5 of the Regulation.

**1.  DATA CONTROLLER**

Woodco soc. Coop., having its registered office in Via Antonio Detassis 17, 38121 Trento – Italy (hereinafter “Woodco” or “Controller”) is constantly committed to protecting the online privacy of its users. Before providing any personal data to the Controller, you are kindly requested to read this privacy carefully as it contains important information regarding the protection of personal data.
Any enquiries must be addressed to +39 0461 40511 or to info@woodco.it or mailed to the Privacy Office of Woodco Soc. Coop. – Via Antonio Detassis 17 – 38121 Trento – Italy.

**2.  PERSONAL DATA SUBJECT TO PROCESSING**

The personal data that are subject to processing may include identifiers such as name, ID number, information regarding location, an online ID or one or more distinguished features regarding the physical, physiological, psychic, financial, cultural or social identity that may identify the data subject or make him/her identifiable, depending on the type of services requested.
More specifically, the personal data processed when accessing the Site include:

**(a) Navigation data**

The information systems and software procedures underlying the running of the Site will, during normal operations, collect some web surfing-related information, the transmission of which is considered as implied in the use of Internet communication protocols. This information is not collected for the purpose of being associated with identified data subjects. However, due to its nature it may, through associations with and processing of data held by third parties, allow the users or surfers to be identified. This type of data includes the IP addresses and domain names of the computers used by the users to access the website, addresses in URI (Uniform Resource Identifier) notation of the resources requested, time of request, method used to submit the request to the web server, size of the file received in response, numerical code representing the status of the response provided by the web server (successful, error, etc.) and other metrics related to the user’s operating system and IT environment. These data are used for the sole purpose of gathering anonymous statistical data regarding the use of this Site and to check its proper running, to identify faults and/or abuses and are deleted immediately after processing. These data may be used to investigate and establish liability in the event of possible cybercrimes against the Site or third parties.
Specific notices are provided in the website sections regarding special services — which may also require registration in order to be accessed — where the personal data of the Site user may be requested.

**(b)Categories of personal data**

When using the “Contacts” (http://outlet.woodco.it/IT/contactus) section of the Site, users may be requested to provide personal data falling within the special categories of Personal Data as under Article 9 of the Regulation, quoting verbatim “[...] data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.” We encourage our users not to disclose such data, unless this is strictly necessary. Indeed, we should like to point out that if Personal Data falling within special categories are provided without any specific consent to the processing of such data being given (in any such event, however, requests for information may still be submitted), then Woodco will not be held responsible in any way nor may any complaint be lodged against it, inasmuch as processing will, in this case, be allowed due to the fact that the relevant data will be considered as made manifestly public by the data subject, consistent with Article 9.1(e) of the Regulation. As mentioned earlier, however, we should like to underscore the importance of expressing your explicit consent to the processing of special categories of Personal Data if you decide to share such data.
Woodco may, in any event and for recruiting purposes, analyse the social professional profiles freely available on the Internet (e.g. through LinkedIn).

**(c) DATA COLLECTED THROUGH COOKIES**

**What are cookies?**

Navigation on this Site involves receiving cookies, i.e. short text strings that the websites visited by the users send to the latter’s browser (a browser being the application required to navigate, such as Chrome, Explorer, Mozilla, etc.) where they are stored in order to be sent back to the same websites during later visits by the users. When users access a site, their computer may also receive cookies from websites or servers other than the one being visited (known as “third party” cookies). Cookies include technical cookies, which allow tasks that are strictly related to the site operation to be performed and which may be used freely, as well as profiling cookies, which are used to show advertising messages to the user in line with the preference he/she has shown while surfing and in respect of which his/her consent is required.
When accessing this site, users may receive technical cookies and profiling cookies from third parties.

**Technical cookies**

Reliance is made in particular on navigation technical cookies to store navigation preferences and improve site navigation as well as analytical cookies (specifically, Google Analytics provided by Google Inc. - hereinafter “Google”) to collect, in an anonymous and aggregate form, statistical information about user navigation experience (e.g. number of pages visited and number of accesses, time spent on the site) which help understand what aspects of the website may be improved.
 To learn more about the processing of data performed by Google using the Google Analytics service, please visit <http://www.google.com/analytics/learn/privacy.html> and read Google privacy policy at web <http://www.google.com/intl/it/policies/privacy/>.
The use of these cookies does not require the consent of the user, who may at any rate decide to disable the use of cookies on his/her browser. In addition, Google Analytics cookies may be simply rejected using the special tool provided by Google (v. [https://support.google.com/analytics/answer/181881?hl=it&ref\_topic=2919…](https://support.google.com/analytics/answer/181881?hl=it&ref_topic=2919631&vid=1-635775549103353382-1182928194)).

**(d) Third party profiling cookies**

In addition, when accessing certain pages of this Site, the user’s browser may also receive third party profiling cookies, e.g. to allow contents hosted on external platforms to be viewed and to interact with such contents (e.g. YouTube), or cookies connected to Google AdWords service, the purpose being to allow the user to view advertisements based on websites visited earlier as he/she continues to surf. For this reason, when accessing such pages a banner will pop up to inform the user and allow him/her to give his/her consent to receiving such cookies by closing the banner or clicking on any other item shown on the page outside the banner itself. Woodco does not have access to information collected by third party cookies, as these are used by the operators of the aforesaid services as they deem fit. To learn more about how data collected through such cookies are used, please view the privacy notices provided by the entities supplying the relevant services. More specifically, third party cookies used within the Site include:

* • YouTube: <https://www.youtube.com/static?template=privacy_guidelines>
* • Vimeo: <https://vimeo.com/cookie_policy>
* • AdWords: <https://support.google.com/adwordspolicy/answer/6008942?hl=it>

Users may disable the cookies installed by aforesaid third parties by clicking on the relevant links. Where no link is provided, reference may be made to the following site: [www.youronlinechoices.com/it/](http://www.youronlinechoices.com/it/), where user preferences related to cookies may be managed.

**(e) How to handle cookies within your browser**
 You may set your browser to warn you about the presence of cookies and decide whether to accept or not a specific cookie or reject all cookies automatically. Reference links are provided below to learn how to enable/disable cookies in the main browsers:

* • Google Chrome: <https://support.google.com/accounts/answer/61416?hl=it>
* • Mozilla Firefox: [https://support.mozilla.org/it/kb/Attivare%20e%20disattivare%20i%20cook…](https://support.mozilla.org/it/kb/Attivare%20e%20disattivare%20i%20cookie)
* • Apple Safari: <https://support.apple.com/kb/PH19214?locale=it_IT>
* • Opera: <http://help.opera.com/Windows/10.00/it/cookies.html>
* • Microsoft Internet Explorer e Microsoft Edge: [https://support.microsoft.com/it-it/help/17442/windows-internet-explore…](https://support.microsoft.com/it-it/help/17442/windows-internet-explorer-delete-manage-cookies)

If you decide to reject cookies, some or all of the interactive functions of the Site may not be used.

**3.  PURPOSES OF PROCESSING**

Your personal data will be processed for the following purposes:

3.1 To ensure and manage your subscription to and registration with the Site, Site navigation and the delivery of the services provided by the Controller, including the security management of the Site;

3.2 To comply with any obligations under applicable law provisions, regulations or community standards or meet requests submitted by the authorities;

3.3 To process statistics, without the possibility for the identity of the data subject to be tracked;

3.4 To review requests and reach out to the users who submit their requests through the “Contacts” section;

3.5 To send, directly, newsletters and communications for direct marketing purposes by email, sms, mms, push notices, fax, paper-based mail, in relation to the products sold by Woodco;

3.6 To perform profiling tasks by collecting and analysing information regarding choices and selections made by the users within the Site with a view to sending customised offers concerning other products and/or services.

Specific security measures have been adopted to prevent loss of data, illegal or inappropriate use and unauthorised access.

**4.  LEGAL BASIS AND MANDATORY OR OPTIONAL NATURE OF PROCESSING**

The legal basis of the processing of personal data for the purposes as under 3.1 above is stated under Article 6.1(b) of the Regulation, since processing is required to deliver the services or to respond to the data subject’s requests. On the other hand, the legal basis of the processing of personal data for the purposes as under 3.2 above is stated under Article 6.1(c) of the Regulation (“processing is necessary for compliance with a legal obligation to which the controller is subject”). While providing your personal data for these purposes is optional, your failure to do so may prevent the requested services from being activated.
 Kindly note, however, that processing as under 3.3 above is not carried out based on personal data and, as such, it may be freely performed by the Controller.
The legal basis of the processing of personal data for the purposes as under 3.5 and 3.6 above is stated under Article 6.1.(a) of the Regulation, inasmuch as processing is based on consent. Consent is optional and may be withdrawn at any time without any consequences (except that you will no longer receive marketing communications and/or be subject to profiling). The consents provided previously may be withdrawn by following the instructions provided under section 8 of this Policy.
With regard to processing related to (i) the direct delivery of its advertising materials or (ii) direct sale or (iii) the conduct of its own market research or (iv) the delivery of commercial communications in relation to Controller’s products and services which are similar to those used by the user, Woodco may use the email addresses pursuant to, and to the extent as allowed by, Article 130(4) of the [Italian] Privacy Code (Legislative Decree No. 196/2003) and by measure dated 19 June 2008 issued by the Supervisory Authority for the protection of personal data, including when explicit consent has not been provided. The legal basis of the processing of personal data for these purposes is stated under Article 6(1)(f) of the Regulation. Data subjects have the right to object to such processing at any time, either from the outset or on the occasion of future communications. To this end, an easy and free of charge procedure will be in place, including by writing to the contacts provided under section 1 “DATA CONTROLLER” of this policy. They are also entitled to obtained immediate feedback confirming the interruption of such processing (Article 15 of the Regulation).

**5.  PERSONAL DATA RECIPIENTS**

The personal data so collected may, for the purposes as under 3 of this privacy policy, be shared with:
 5.1 individuals who typically act as data processors pursuant to Article 28 of the Regulation, i.e. individuals who co-operate with the Controller in the pursuit of the aforesaid purposes, including individuals entrusted with technical maintenance tasks (jointly, the “Recipients”); the list of external data processors may be obtained from the Controller by writing to the contacts as shown in section 1 “DATA CONTROLLER” of this privacy policy;
5.2 individuals, organisations or authorities to whom such data must be disclosed pursuant to law provisions or orders issued by the relevant authorities;
5.3 people authorised by the Controller — pursuant to Article 29 of the Regulation — to process personal data in order to carry out activities strictly related to the supply of services, such people having committed themselves to confidentiality or being at any rate bound by adequate confidentiality legal obligations.
The updated list of individuals who may process your personal data in their capacity as data processors may be obtained by sending a written request to the Controller to the contacts shown in section 1 “DATA CONTROLLER” of this privacy policy.

 **6.  TRANSFER OF PERSONAL DATA**

The Controller hereby informs you that Woodco does not transfer data to countries outside the European Economic Area.

 **7.  DATA RETENTION**

The personal data processed for the purposes under section 3.1 above will be retained for such a period of time as may be strictly necessary to achieve these purposes. In any event, since processing pertains to the supply of services, the Controller will retain your personal data for the period of time required and permitted under Italian law provisions in order to protect its own interests (Section 2946 et seq. of the Civil Code).
Any personal data processed for the purposes as under section 3.2 above will be retained until required by the specific applicable law obligation or provisions.
More information about the period of retention of the data and the criteria used to establish such period may be obtained by sending a written request to the Controller using the contacts provided in section 1 “DATA CONTROLLER” of this privacy policy.
The foregoing will, however, be without prejudice to the Controller’s right to retain your personal data for the period of time required and permitted under Italian law provisions in order to protect its own interests (Section 2947 of the Civil Code).

**8.  DATA SUBJECT RIGHTS**

Pursuant to Articles 15 et seq. of the Regulation, the data subject has the right to (i) obtain from Woodco, at any time, access to his/her own Personal Data, the rectification or erasure of such data, or (ii) object to their processing, request the restriction of processing in the cases as under Article 18 of the Regulation, and (iii) obtain the data concerning him/her in a structured, commonly used and machine-readable format in the cases as listed under Article 20 of the Regulation.
Any such requests must be made in writing to the Controller using the contacts shown in the “Contacts” section of this privacy policy.
In any event, the data subject will — pursuant to Article 77 of the Regulation — always have the right to file a complaint with the Supervisory Authority (locally known as *Garante per la Protezione dei Dati Personali*) if he/she believes that the processing of his/her Personal Data is in breach of applicable law provisions.

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