

The logo for SIVAM is a vertical rectangle divided into two horizontal sections. The top section is green and contains the word "SIVAM" in white, bold, uppercase letters. The bottom section is yellow. The text "SIVAM" is positioned at the top of the green section, with its bottom edge slightly overlapping the yellow section.

**SIVAM**

## **PRIVACY POLICY**

Information provided pursuant to Art.13 of EU Reg. 2016/679 (here in after GDPR)



## 1. INFORMATION OF A GENERAL NATURE

The data subjects are informed of the following general profiles, valid for all processing areas:

- all the data of the data subjects with whom we interface are processed in accordance with the current regulations on privacy (EU Reg. 2016/679 "GDPR" and Italian Leg. Decree 196/2003, as amended and supplemented by Leg. Decree 101/2018);
- all the data of the data subjects with whom we interface are processed in a lawful, correct and transparent way, in accordance with the general principles laid down in Art.5 of the GDPR;
- specific security measures are observed to prevent the loss of data, illicit or incorrect use and unauthorised access, in accordance with Art.32 of the GDPR.

### DATA CONTROLLER

SIVAM (Società Italiana Veterinaria Agricola Milano) - Via XXV Aprile, 4 - 26841 Casalpuusterlengo (LO)  
– VAT no. 06290050159 Tel.: +39 0377 8341  
Certified email: [sivam@pec.sivamspa.it](mailto:sivam@pec.sivamspa.it)

### DATA PROTECTION OFFICER (DPO)

Galli Data Service Srl - Strada della Viggioletta, 8 - 29121 Piacenza – VAT no.: 01690860331 Tel. +39 0523 1865049  
Certified email: [gallidataservicesrl@pec.it](mailto:gallidataservicesrl@pec.it)

### DEDICATED EMAIL ADDRESS FOR ANY PRIVACY REQUEST:

[privacy@sivamspa.it](mailto:privacy@sivamspa.it)

### DATA SUBJECTS' RIGHTS

- right to request the presence and access to personal data concerning the data subject (Art.15 "Right of access")
- right to obtain rectification/supplementing of inaccurate or incomplete data (Art.16 "Right to rectification")
- right to obtain, if there are justified reasons, the erasure of data (Art.17 "Right to erasure")
- right to obtain the restriction of processing (Art.18 "Right to restriction")
- right to receive data concerning the data subject in a structured format (Art.20 "Right to portability")
- right to object to processing and automated decision-making processes, including profiling (Art.21, 22)
- right to revoke previously given consent;
- right to submit a complaint, in the absence of a reply, to the Supervisory Authority.

## 2. DATA PROCESSING RELATED TO THE OPERATION OF THIS SITE

### Browsing data

The computer systems and software procedures used to operate this website acquire, during their normal operation, a quantity of personal data the transmission of which 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 could, through processing and association with data held by third parties, allow users to be identified. This category of data includes IP addresses or domain names of computers used by users who connect to the site, the addresses in 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 (successful, error, etc.) and other parameters relating to the operating system and the user's computer environment.

|   |   |
|---|---|
| <b>Purpose and legal basis of processing</b><br>(GDPR-Art.13, sub-section 1, lett. c) | These data are used for the sole purpose of obtaining statistical information on the use of the website and to check its correct functioning. 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 data controller).  |
| <b>Scope of communication</b><br>(GDPR-Art.13, sub-section 1, lett. e,f)              | The data may only be processed by internal personnel, regularly authorised and instructed to carry out such processing (GDPR-Art.29) or by persons in charge of the maintenance of the web platform (appointed in this case as external processors) and will not be communicated to other entities, disseminated or transferred to countries outside the EU. The data will only be placed at the disposal of the competent authorities in case of an investigation. |
| <b>Data storage period</b><br>(GDPR-Art.13, sub-section 2, lett.a)                    | The data are normally stored for short periods of time, excepting any extensions related to investigation activities.   |
| <b>Data provision</b><br>(GDPR-Art.13, comma 2, lett.f)                               | The data are not provided by the data subject but acquired automatically by the website's technological systems.  |

### Cookies

For detailed information regarding the use of cookies, please refer to the specific cookie policy [https://www.sivamspa.it/resources/pdf/sivam\\_cookie\\_policy.pdf](https://www.sivamspa.it/resources/pdf/sivam_cookie_policy.pdf)

### Specific services

The website could contain data collection forms aimed at providing the browser with a number of services/functions (e.g.: request information, recordings, etc.).

|   |  |
|---|--|
| <b>Purpose and legal basis of processing</b><br>(GDPR-Art.13, sub-section 1, lett. c) | If necessary, identification and contact details will be requested necessary to respond to the requests of the data subjects. The sending of the request is subject to specific, free and informed consent (GDPR-Art.6, paragraph 1, lett.a)   |
| <b>Scope of communication</b><br>(GDPR-Art.13, sub-section 1, lett. e, f)             | The data are processed exclusively by personnel regularly authorised and instructed to carry out processing (GDPR-Art.29) or by any entities in charge of the maintenance of the web platform or the provision of the service (appointed in this case as external processors). The data will not be disseminated or transferred to countries outside the EU. |
| <b>Data storage period</b><br>(GDPR-Art.13, sub-section 2, lett. a)                   | The data are stored for periods of time compatible with the purposes of collection   |
| <b>Data provision</b><br>(GDPR-Art.13, comma 2, lett. f)                              | The provision of data with reference to the mandatory fields is necessary to obtain a reply, while the optional fields aim at providing the staff with further elements useful for making contact easier.  |

### **Data provided voluntarily by the user**

The optional, explicit and voluntary sending of electronic and/or ordinary mail to the addresses indicated on this website involves the subsequent acquisition of the sender's address, necessary to respond to requests, as well as any other personal data included in the message. Should the sender send his or her curriculum vitae to submit his or her professional application, he or she alone shall be responsible for the relevance and accuracy of the data sent. Please note that any curricula without the authorisation to process the data will be immediately deleted.

## **3. PROCESSING OF DATA CONCERNING RELATIONSHIPS ESTABLISHED WITH CUSTOMERS AND SUPPLIERS**

### **3.1 Purpose of processing**

The organisation processes personal identification data of customers/suppliers (e.g. first name, last name, company name, personal/tax data, address, telephone, email, bank and payment details) and their operational contacts (first name, last name and contact details) acquired and used to provide the services.

### **3.2 Purpose and legal basis of processing**

The data are processed to:

- enter into contractual/professional agreements;
- fulfil pre-contractual, contractual and tax obligations arising from existing relationships, as well as manage the necessary communications related thereto;
- fulfil the obligations required by law, regulations, Community legislation or an order of the Authorities
- exercise a legitimate interest as well as a right of the Data Controller (e.g.: the right to defence in court, protection of credit positions; ordinary internal operational, management and accounting requirements).

Failure to provide the above data will make it impossible to establish a relationship with the Data Controller. The above-mentioned purposes represent, according to Art.6, paragraphs b, c, f, suitable legal bases for the lawfulness of processing. If it is intended to carry out processing for different purposes, the specific consent of the data subjects will be requested.

### **3.3 Processing methods**

The processing of personal data is carried out through the operations indicated in Art. 4 no. 2) GDPR and precisely: collection, recording, organisation, storage, reference, processing, amendment, selection, extraction, comparison, use, interconnection, blocking, communication, erasure and destruction of data. Personal data are subject to both paper and electronic and/or automated processing. The Data Controller will process personal data for the time necessary to fulfil the purposes for which they were collected and related legal obligations.

### **3.4 Scope of processing**

The data are processed by internal entities duly authorised and instructed in accordance with Art.29 of the GDPR. It is also possible to request the scope of communication of personal data, obtaining precise information on any external entities operating as Data Processors or independent Data Controllers (consultants, technicians, banks, carriers, etc.).

## **4. POLICY UPDATING**

It should be noted that this data policy may be subject to periodic review, including in relation to the relevant legislation and case law. In the event of significant changes, appropriate evidence will be given on the home-page of the website for an appropriate period of time. In any case, the data subject is invited to periodically refer to this policy



## COOKIE POLICY | FULL POLICY

### DEFINITION OF COOKIES:

Cookies are short fragments of text (letters and/or numbers) that allow the web server to store information on the customer (the browser) to be reused during the same visit to the website (session cookies) or later, even days later (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, for example, web beacons, transparent GIFs and all forms of local storage introduced with HTML5, can be used to collect information on user behaviour and use of services. Cookies are used to ensure that procedures work properly and to improve the user experience of online applications. Detailed information is provided below on the use of cookies and how to manage them, in relation to the website **[WWW.SIVAMSPA.IT](http://WWW.SIVAMSPA.IT)**

### TYPES OF COOKIES

By visiting this website, cookies may be received both from the visited website ("proprietary") and from websites operated by other organisations ("third parties"). The presence of the latter involves the transmission of cookies to and from websites operated by these third parties. The management of information collected by "third parties" is governed by the relevant policy to which reference should be made. For the sake of greater transparency and convenience, the table next to each "third party" shows the web addresses of the different policies and how to manage cookies.

Depending on the characteristics and use of cookies, these can be split into different categories:

a) **Technical Cookies:** are those used for the sole purpose of sending a communication over an electronic communication network, or to the extent strictly necessary for the provider of an information company service explicitly requested by the subscriber or user to provide such service. They are not used for any other purpose and are normally installed directly by the owner or operator of the website. Technical cookies do not require the user's consent, so they are installed automatically upon access to the website. It is however important to underline that in order to duly provide its on-line services, the owner of the site, i.e. SIVAM SpA, needs to use technical cookies. If, therefore, the use of these cookies is disabled, for exclusively technical reasons, SIVAM SpA will be unable to provide all or some services or to provide them in the manner requested.

**Technical cookies are in turn split into:**

Navigation or Session cookies which ensure normal browsing activity and use of the website.

| PURPOSE          | ORIGIN | DURATION |
|------------------|--------|----------|
| Variable session | Own    | Session  |

- Functionality cookies which allow the user to browse the website according to a set of selected criteria (e.g. language) in order to improve the service provided to the user.

| PURPOSE       | ORIGIN | THIRD-PARTY POLICY | DURATION   |
|---------------|--------|--------------------|------------|
| Language      | Own    | n.a.               | Persistent |
| Nationality   | Own    | n.a.               | Session    |
| Cookie policy | Own    | n.a.               | Persistent |

- Cookie Analytics which are used directly by the website operator to collect information, in aggregate form, on the number of users and how they visit the site

| PURPOSE             | ORIGIN           | THIRD-PARTY POLICY | DURATION   |
|---------------------|------------------|--------------------|------------|
| Campaign monitoring | Own              | n.a.               | Persistent |
| Visit tracing       | Google Analytics | See policy         | Persistent |



- a) Third-party cookies in particular Social Networks, which allow users to interact with social networks (e.g. Facebook, Twitter, YouTube, Vimeo, etc.) and in particular to share site content through these channels.

| PURPOSE                | ORIGIN                     | THIRD-PARTY POLICY | DURATION                     |
|------------------------|----------------------------|--------------------|------------------------------|
| Social Network sharing | Third-parties (Share This) | n.a.               | Persistent (up to a 2 years) |

In particular, for the SIVAM S.p.A website:

**I Like button and social widgets of Facebook (Facebook, Inc.)**

The "I Like" button and social widgets of Facebook are services of interaction with the Facebook social network, provided by Facebook, Inc.

Collected personal data: Cookies and Usage Data.

Place of processing: USA – Privacy Policy

Since the installation of cookies and other tracking systems operated by third parties through the services used within this Application cannot be technically controlled by the Data Controller, any specific reference to cookies and tracking system installed by third parties is to be considered approximate. To obtain complete information, please read the privacy policy of any third party services indicated in this document. Given the objective complexity linked to the identification of cookie-based technologies and their very close integration with the functioning of the web, the User is invited to contact the Data Controller if he or she would like to receive any further information regarding the use of cookies and any use of the same, for example by third parties, made through this site.

**CONSENTING TO THE USE OF COOKIES**

User consent is not required for technical cookies.

Instead, the user must give his or her consent to the use of profiling cookies – his or her own or those of third parties - (the aim of which is to create profiles related to the user in order to send him or her advertising messages in line with his or her preferences), or analytical cookies of third parties (which do not collect information about the user in aggregate form) and continues browsing the website, either by active intervention through the selection of an element contained in the page below the banner (for example, by clicking on an image or link) or by clicking on the "OK" button on the banner itself.



## COOKIE MANAGEMENT

The user can also decide whether or not to accept cookies by using his or her browser settings. Disabling "third party" cookies in no way affects browsing. The setting can be defined specifically for different websites and web applications. What is more, the best browsers allow defining different settings for "proprietary" and "third party" cookies. By way of example, in Firefox, through the menu Tools -> Options -> Privacy, a control panel can be accessed where it is possible to define whether or not to accept different types of cookies and proceed with their removal.

**Chrome:** <https://support.google.com/chrome/answer/95647?hl=it>

**Firefox:** <https://support.mozilla.org/it/kb/Gestione%20dei%20cookie>

**Internet Explorer:** <http://windows.microsoft.com/it-it/windows7/how-to-manage-cookies-in-internet-explorer-9>

**Opera:** <http://help.opera.com/Windows/10.00/it/cookies.html>

**Safari:** [http://support.apple.com/kb/HT1677?viewlocale=it\\_IT](http://support.apple.com/kb/HT1677?viewlocale=it_IT)