

PRIVACY & COOKIE POLICY

1. Information about website privacy policy

This section represents the Terms & Conditions of personal data processing referring to users surfing the website Incomo.com (hereinafter: This Site) or using the services provided on it. Surfing this Site may determine the processing of personal data of identified or identifiable people. Disclosure of such information has legal value to the purposes indicated in Art. 13 of UE Regulation 2016/679 (GDPR - General Data Protection Regulation) for users who surf This Site. They are not valid for other websites that may be visited by users through links contained in it. Purpose of the present document is to give information about methods, timing and nature of information that Data Holder must provide to users when they visit the web pages of This Site, independently from the purposes of the connection itself, according to the Italian and European Law.

With reference to proposal of direct services, in case of users under 14, personal data processing shall be legitimated only upon authorization by their parents or legal guardians.

2. Data processing

2.1 Data Holder

Data Holder of this site is Incomo srl, Como, via P.Paoli, 43.

For any clarification or reference to exercise of rights, please, contact nicoletta@incomo.com.

2.2 Data Protection Controller

Data Holder has not elected a Data Protection Controller, as per Art. 37-39 of UE Regulation 2016/679.

2.3 Data Processing Controller

Data Holder has not elected a Data Processing Controller, as per Art. 28 of UE Regulation 2016/679.

2.4 Place of data processing

Place of data processing generated by the use of this Site is: Data Holder's Headquarters.

3. Data processed

3.1 Data Processing Policy

Like all websites, This Site also uses log files storing information automatically collected by users surfing in. They may be:

- internet protocol address (IP);
- type of browser and access keys;
- name of internet service provider (ISP);
- date and time of visit;
- web page of origin of the visitor (referral) and exit;

The above mentioned info are processed automatically and collected in an aggregate way only to check that the website works correctly and as safety measures. They shall be processed according to the Holder's legitimate respect.

As a safety measure (antispam filters, firewall, virus check), data collected automatically can also include personal data like the IP address that may be used, in line with the applicable laws, to block all possible attempts to damage the Site itself or the other users, as well as any other harmful or criminal activities.

Data are never used to trace the surfer's profile, but only to protect the Site and its users and shall be processed according to the Holder's legitimate respect.

If the Site allows to save comments or to ask for specific services, like the chance to send a CV for a possible professional collaboration, it gathers and records automatically some identification data like the email address. Such data are meant to be willingly left by users when making their request. By saving a comment or another piece of information, the surfer expressly accepts the privacy

policy adopted and, in particular, that the content introduced can be freely spread to third parties. The data collected shall be used exclusively to supply the service required and for the sole time needed to this operation.

The information that the website surfers decide to get published by means of the above mentioned services and the instruments available, are given consciously and voluntarily, exempting This Site from any liability for any violation of laws. It is duty of the website users to check their permits to the entry of personal data of third parties or contents protected by national and international laws.

3.2 Purposes of data processing

Data collected by This Site, when entered, are used to the purpose mentioned above and to marketing actions, too, also by means of newsletters.

3.3 Data storage

Data shall be stored only for the time necessary to the above mentioned purposes, in line with the current Italian and European laws.

Data collected as a safety measure (blockage of all possible attempts to damage This Site) shall be stored for the period strictly necessary to this purpose.

3.4 Data given by the user

As aforementioned, the optional, explicit and voluntary sending of e-mails to the addresses indicated on This Site leads to the subsequent acquisition of the e-mail address, necessary to meet the users' requests, as well as any other personal data included in the message.

Specific summary information shall be progressively reported or displayed on the pages of the Site prepared for special services upon request.

4. Users rights

Art. 13, Par. 2 of UE Regulation 2016/679 states the users' rights.

In particular, users have the right to ask the Data Holder for: personal data access (Art. 15), modification (Art. 16), cancellation (Art.17), processing restriction (Art.18) or total obstruction (Art. 21); furthermore, they can ask for: data portability (Art. 20), consent revocation (Art. 7, Par. 3), make a complaint to the Guarantor - Italian Data Protection Authority (Art. 77).

The user could at any time exercise his rights by sending a request to Data Holder, without formalities, to the above mentioned email address.

5. Data transfer to extra-eu countries

This Site may share some of the data collected with services located outside the European Union, in particular with Google, Facebook and Microsoft (LinkedIn) through social plugins and Google Analytics service. The transfer is authorized and strictly regulated by Art. 45, Par. 1 of EU Regulation 2016/679 as these companies guarantee their own adherence to the Privacy Shield. Data will never be transferred to third countries that do not comply with the conditions foreseen in Section V of EU Regulation 2016/679.

6. Data safety

This Site processes the users' data in a lawful and correct way, adopting the appropriate safety measures aimed to prevent any unauthorized access, disclosure, modification or cancellation. Processing is carried out using IT and/or telematic tools, with organizational methods and with logics strictly related to these very purposes.

There shall be times when, in addition to the Data Holder, other internal people involved in the Site organization may have access to the data (administrative, commercial and marketing employees, lawyers, system administrators) or external people (for instance: technical services suppliers, postal couriers, hosting providers, IT companies, communication agencies).

7. Cookies

7.1 What are Cookies?

Cookies are used by websites to make the users' browsing experience easier and more intuitive. In fact, they are small strings of text used to store some information that may concern the users, their preferences or their device used to access the Internet (pc, tablet or mobile phone) and are mainly

used to adapt the Site operation to the users' expectations, offering a more personalized browsing experience and saving all previous choices.

A Cookie consists of reduced sets of data transferred from a server to the users' browser; it can be read only by the server that made the transfer. They are not executable codes and do not transmit any virus.

Cookies do not record any personal information; any identifiable data will not be stored.

7.2 How to disable cookies by configuring the browser?

Some users prefer configuring the browser so as to disable cookies even though, by doing so, the use of the Site and of its services may be compromised. For further information, please, visit the specific help page of the most widespread web browser:

- Internet Explorer:

<http://windows.microsoft.com/en-us/windows-vista/block-or-allow-cookies>

- Firefox:

<https://support.mozilla.org/en-us/kb/enable-and-disable-cookies-website-preferences>

- Safari:

<http://www.apple.com/legal/privacy/it/>

- Chrome:

<https://support.google.com/accounts/answer/61416?hl=it>

- Opera:

<http://www.opera.com/help/tutorials/security/cookies/>

7.3 What types of cookies exist?

Please, find below the types of cookies generally used in websites:

7.3.1 Technical cookies

There are many technologies used to store information in the users' PC; then, such information are collected by other sites. The technology most appreciated, well known and used is that of HTML cookies. HTML cookies are used to surf the net and to allow an easy access and use of websites by users. They are necessary for the transmission of communication on the electronic network, i.e. to the service supplier to meet the users' requests.

Cookies introduced into the browser and re-transmitted by means of Google Analytics or by the statistic service of bloggers or similar are to be considered technical only if used by this Site owner to

optimize it; in this case, the owner shall, in an aggregate way, collect information about the number of the users and how they visit this Site. Under these conditions, the same rules provided for technical cookies apply for analytics cookies, in terms of disclosure and consent.

From the point of view of duration we can distinguish the temporary session cookies, automatically deleted after every single browsing session and used to identify the user, avoiding the log in for every page visited, from the permanent cookies, which remain active in the PC until the expiring date or cancellation by users.

Session cookies may be installed in order to allow access and stay in the reserved area of the web-portal

as an authenticated user.

They are not stored permanently but only for the duration of the net surfing until the browser is closed; then, they disappear when it gets closed. Their use is strictly limited to the transmission of session identifiers consisting of random numbers generated by the server and necessary to allow a safe and efficient Site surfing.

7.3.2 Third Party Cookies

According to their origin, cookies can be distinguished the cookies sent to the browser directly from the Site surfed and those sent to the PC by Third Parties from other websites.

Permanent cookies are often Third Party cookies.

Most Third Parties cookies are tracking cookies used to identify online behavior and understand the general interests so as to customize advertising and proposals for the final users.

Third Party analytics cookies are used to detect information on general users' behavior when surfing the net. Data collection is carried on anonymously, so as to monitor performances and improve the Site usability. Third Parties profiling cookies are used to create profiles related to users, so as to submit ad messages in line with the choices expressed by the users themselves while surfing the net.

The use of such cookies is ruled by the regulation set by the Third Parties themselves. Therefore users are always invited to read the various privacy policies and indications to manage or disable the cookies published on every single web page (see below).

7.3.3 Profiling Cookies

Profiling cookies are those aimed at creating user profiles and are used to send ad messages in line with the preferences expressed by users while surfing the net. When these types of cookies are used, users shall give explicit consent to data processing. Art. 22 of UE regulation 2016/679 (GDPR - General Data Protection Regulation) and Art. 122 of Italian D.Lgs. 196/2003 (Personal Data Protection Code) shall be applied to data processing. In this sense, the provision on use of cookies edited by the Guarantor on 2014, May 8th – as well as its subsequent clarifications – shall also be taken into account.

7.4 What types of cookies are used in This Site?

This Site uses many types of cookies (see chart below) to recognize the many users' technical surfing devices and offer some special functionalities like:

- allow an easier and more correct Site surfing;
- count the number of visitors on a single page;
- facilitate the access to services requiring authentication;
- know exactly which areas of This Site have been visited.

COOKIE	TYPE	DURATION	DESCRIPTION
Google Analytics	Third Parties –Profiling	Session	Allows to obtain information on users' surfing
Google Tag Manager	Third Parties –Technical	Session	Allows to create and update tags for users' websites
Facebook Connect	Third Parties –Profiling	Permanent	Allows users already registered to Facebook to authenticate on the site without requesting login credentials entered during authentication; in addition, it makes it easier for users to share content through Facebook
Facebook Custom Audience Permanente	Third Parties –Profiling	Permanent	Allows, through the use of conversion pixels, the identification of users who visited This Site and the pages of some specific products, accessing from any device with a Facebook ID; in this way the owner can monitor the adherence to a campaign advertised on Facebook..

7.5 - Plugin Social Network

This Site also incorporates plugins and/or buttons for social networks, in order to allow easy sharing of content on your favorite social networks (for ex. Facebook, Instagram, Pinterest, Flickr, Twitter). These plugins are programmed so as not to set any cookies when accessing the page, to safeguard the privacy of users. Cookies are possible, if allowed by the social networks themselves, when the user makes effective and voluntary use of the plugin. Please, kindly note that if the user surfs the net being logged into the social network, then he has already consented to the use of cookies conveyed through This Site at the time of registration to the social network.

The collection and use of the information obtained by means of the plugin are governed by the respective privacy policies of the social networks; in this sense, please, refer to:

- Facebook:

<https://www.facebook.com/help/cookies>

- Instagram:

<https://help.instagram.com/1896641480634370>

- Pinterest:

<https://policy.pinterest.com/it/cookies>

- Flickr:

<https://www.flickr.com/help/cookies>

- Twitter:

<https://support.twitter.com/articles/20170519-uso-dei-cookie-e-di-altre-tecnologie-simili-da-parte-di-twitter>

8. Modifications to the present document

The present document, published on <https://www.incomo.com/pdf/privacy.pdf> and reachable directly from the home page by the specific link, represents the privacy & cookie policy of This Site.

It may be subject to modifications or updates. Users are therefore invited to periodically consult this page to always get updated with the latest legislative rules.

In particular, this very version has been updated on 2018 September 19th to be in line with the Italian D. Lgs. 101/18 which has aligned the Italian law to the UE Regulation 2016/679, repealing – among the others – Art. 7 and Art. 9 of the Italian Privacy Code (D. Lgs. 196/03) and introducing the new Art. 2-quinquies which sets as 14 years as the age under which the consent for personal data processing, referring to direct proposal of services by This Site, shall be legitimate only upon authorization by parents or legal guardians.