

# PRIVACY POLICY

## 1. **Applicability**

- 1.1. *General Condition.* We inform You pursuant to art. 13 of the European Regulation No. 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC, General Data Protection Regulation (hereinafter the “GDPR”), on the processing of Your Personal Data collected on the Website of MYLucchiniRS CLUB - APS and related rights.

In this privacy and cookies policy of MYLucchiniRS CLUB - APS (“Privacy Policy”) the terms “We”, “Our” and “Us” refers to MYLucchiniRS CLUB - APS and “You” and “User” refers to the user of the Website.

This Privacy Policy applies to the use of any information, pictures, documents and/or other data of the User, which may include name, address, telephone number, email address, gender (“Personal Data”) collected on the website of the MYLucchiniRS CLUB - APS on the following link:

[www.mylucchinirsclub.com](http://www.mylucchinirsclub.com) (the “Website”).

- 1.2. Further specific policies will be provided, where necessary, during the browsing session, by which MYLucchiniRS CLUB - APS will collect data in order to provide You the services of Our Website. This Privacy Policy refers exclusively to data provided by users through Our Website. Any other websites reached through the links available on Our Website are expressly excluded from this Privacy Policy. *Data Controller.* The Data Controller is MYLucchiniRS CLUB - APS., a Social Promotion Association organized and existing under the laws of Italy, with its registered office at, Via G. Paglia,41–24065 Lovere (BG), Fiscal Code number 81001280163 (the “Association”). You can exercise Your rights as per CHAPTER III (Rights of the data subject) of the GDPR by addressing the contacts indicated in the following Article 9 of this Privacy Policy.

Any request and/or claim shall contain name, date and contact details of the User, in order to allow MYLucchiniRS CLUB - APS to respond to Your request and contact You.

## 2. **Terms of use of website**

- 2.1. Data privacy. All Personal Data is treated confidentially, and your rights to protection of your justified concerns are observed strictly in accordance with legal requirements.
- 2.2. Information on the Website. The information on the Website is for general information purposes only. Even though LRS MYLucchiniRS CLUB - APS has composed its Website with care, the information, texts, documents, graphics and/or other services/information on it may contain errors or be otherwise incorrect or incomplete. MYLucchiniRS CLUB - APS does not guarantee that the Website and/or the information is free of errors, defects, malware and viruses or that the Website and/or information is correct, up to date and accurate. MYLucchiniRS CLUB - APS shall not be liable for any damages resulting from the use (or inability to use) of the Website, including damages caused by malware, viruses or any incorrectness or incompleteness of such information or the Website, unless such damage is the result of any willful misconduct or from gross negligence on the part of MYLucchiniRS CLUB - APS . MYLucchiniRS CLUB - APS shall further not be liable for damages resulting from the use of (or the inability to use) electronic means of communication with this Website, including – but not limited to – damages resulting from failure or delay in delivery of electronic communications, interception or manipulation of electronic communications

by third parties or by computer programs used for electronic communications and transmission of viruses.

- 2.3. Intellectual property. All brand names, logo, product names and titles used on the Website are trademarks or trade names of MYLucchiniRS CLUB - APS or third-party trademark or trade name holders. You are not allowed to use or reproduce any such trademarks, logo or trade names as this may constitute an infringement of the holder's rights. All Website design, texts, documents and/or other services and the selection and arrangement thereof, and all software compilations, underlying source codes, software and all other material on this Website are the copyrights of MYLucchiniRS CLUB - APS and/or its suppliers and subcontractors. You are not allowed to make any other use of the information and materials on this Website, including reproduction, modification, distribution or republication. Should You wish to use materials or information from this Website, You need Our prior written approval to do so.
- 2.4. Privacy and cookie policy. MYLucchiniRS CLUB - APS collects and processes the Personal Data of the Users of the Website according to the privacy and cookie policy hereunder.

### 3. Privacy and Cookies Policy

When You visit our Website, We obtain Personal Data which You knowingly disclose to Us, for example, by filling in the application for a job with Our Company. In this context We may combine the Personal Data You give Us online with other information from MYLucchiniRS CLUB - APS sources, transactions and communications collected or processed by MYLucchiniRS CLUB - APS and authorized third parties. Finally, if You publicly post about MYLucchiniRS CLUB - APS or communicate directly with Us, on a social media website, We may collect and process the data contained in such posts or in your public profile for the purpose of addressing any customers services requests You may have and to monitor and influence public opinion about MYLucchiniRS CLUB - APS .

The Personal Data We receive by You visiting the Website is treated as confidential and We strictly observe the applicable national and European protection acts in that respect. Your use of the Website indicates Your acceptance of this Privacy Policy, which may be amended from time to time.

1. *User's Privacy.* We may collect, process and use your Personal Data to carry out our obligations arising from any contracts entered into between You and Us, to provide You with information that You request from Us, and to send You the latest product and promotional information. The Company, as mentioned in the previous Section 1, Article 2, is the Data Controller for the processing of your Personal Data. The collected data will be kept confidential and secure from any potential abuse and therefore will only be used for the limited purposes stated as follows.
2. *Purpose and legal basis of processing Personal Data.* MYLucchiniRS CLUB - APS acquires, holds and processes Your Personal Data for the purposes described below and in accordance with the legal basis provided, with the meaning and for the purposes of Article 6 of the GDPR:

**Purpose**

- a) to allow the proper conduct of all operations necessary to grant User the access to the Website's services requested from time to time
- b) to provide technology services (mailing-list, newsletter, local and/or remote assistance and maintenance services, etc.) performed by MYLucchiniRS CLUB - APS and/or by third-parties expressly authorized

**Legal Basis**

the need to execute User's requests related to the Website's services; this is about User

providing data strictly necessary and related to a pre-contractual and contractual stage; the data collected from time to time by MYLucchiniRS CLUB - APS are mandatory, and if the User does not intend to provide them, MYLucchiniRS CLUB - APS will not be able to provide User the Website's services requested.

**Purpose**

to collect statistical information in aggregated form on the Website's performances.

**Legal Basis**

the present processing is expressly excluded from the field of application of the GDPR and no legal basis is required. In accordance with such purpose the processing of data refers to anonymized data, namely data from which it is not possible to ascertain, directly or indirectly, the natural person whose data are related to.

**Purpose**

to analyze the information provided by Users regarding the use of the Website.

**Legal Basis**

the free and informed consent of the User. In specific sections of Our Website We will ask You to authorize the use of Your Personal Data, prior acceptance of the relevant privacy and cookies policies (please see the below section on cookies). In such case, in the absence of Your consent, no data will be collected, processed and used for the purposes describe above. You have the right at any time to withdraw the consent previously given. After withdrawal of the consent Your data will not more be processed by MYLucchiniRS CLUB - APS; kindly be informed such withdrawal shall not have retroactive effect.

3. *Log Files.* As with most websites, We automatically gather non-personally identifying information and store it in log files. This information includes internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, data/time stamp, and clickstream data. We use this information, which does not identify Users, to analyze trends, to administer the site and to gather demographic information about our user base as a whole. We do not link this automatically-collected information to personally identifiable information. However, such data, by nature, may allow the identification of the Users through the developments and cross-associations with data held by third-parties. It is noted that such data could be used by the competent Authority to determine any possible criminal liability in the event of cybercrimes.
4. *Social platforms.* Please note that, if You choose to select that option, your activity on our Website will also be made available to social platforms such as but not limited to Facebook, Twitter and YouTube. If You choose to share our Website through social media such as Facebook, Twitter and/or YouTube, your Personal Data (such as your name and the fact that You are interested in MYLucchiniRS CLUB - APS ) will also be visible to all the visitors of your personal webpage on Facebook, Twitter and/or YouTube, depending on your account settings. On the use of such social media websites **only the terms and conditions (including the privacy policy) of the social media website apply.** MYLucchiniRS CLUB - APS is not responsible for the processing of Personal Data or the privacy policy of such social media websites. Our General Terms and Conditions this Privacy Policy is therefore not applicable to the use of such websites.
5. *Links to other websites.* On the Website You will find a number of links to other websites. Although these websites are selected with care, We are not responsible for the processing of your Personal Data through these websites. Our General Terms and Conditions and this Privacy Policy are therefore not applicable to the use of such websites.
6. *Cookies on the Website.* The Website uses cookies to allow the proper functioning of the Website and to improve User's experience. Web Cookies are small pieces of data sent by the Website and they are stored by your browser on your computer's hard drive, so that We are able to recognize your browser when You return on the Website. Cookies can collect data on the use of the Website such as which pages are visited and the duration of a User session. We collect

cookies in an aggregated and anonymized form in order to obtain statistics on the use of the Website and be able to improve the relevant performances. When You use the Website, the cookie sends data to MYLucchiniRS CLUB - APS. We do not retain cookies longer than necessary and, in any case, no longer than one year. **On our Website we use two types of cookies: “technical cookies” for the use of which is not required the consent of the User and “third-parties’ cookies” for the use of which is mandatory to inform the User and collect its consent. Technical cookies are: strictly necessary cookies, analytics cookies, functionality cookies, persistent cookies and session cookies.** *Strictly necessary cookies* are essential in order to enable You to move around the Website and use its features, such as accessing secure areas of the Website. *Analytics cookies* collect anonymous information about how You use the Website and the pages that You have visited, for instance which pages You go to most often, and if You get error messages from web pages. **These cookies do not collect information that identifies You.** All information these cookies collect is aggregated and therefore anonymous. It is only used to improve how our Website works. User may disable these cookies at any time without any loss of function of the Website (Further information on Google analytics cookies policies are available on the following link:

<https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>).

*Functionality cookies* remember your selection and choices to improve your experience in Our Website. These cookies allow Our Website to remember choices You make (such as your user name, language or the region You are located) and provide enhanced, more personal features. The Website can also recognize if the User has already signed up for our newsletter or if the User is seeing a certain page for the first time. The information these cookies collect is aggregated and anonymous and they cannot track your browsing activity on other websites.

*Session cookies* are used to store information about your page activities, so You can easily pick up where You left off on the server’s pages. When You close the internet browser, the session is ended, and the cookie is deleted. Most web browsers automatically accept cookies and allow some control of most cookies through the browser settings, though You do not have to. The Website operates in the best way if these technical cookies are enabled; anyway, User may at any time override these cookies by changing its browser settings.

*Third party cookies* are used for analyzing traffic sources and User’s behavior as well as for controlling access and site features across the Website. **We do not control the use of cookies by third parties other than the agents who provide the web analytics service for Our own site.** If You wish to disable cookies, then You can do so by re-adjusting your browser settings. Please note that in that case You may not be able to register with or use all features of our Website. Third party cookies may include “social plugin” such as Facebook and Twitter. The most common use of these cookies is intended to content-sharing on social networks. For the sake of clarity, hereinafter You may find the link to the cookies policies of the social plugin and search engine used by MYLucchiniRS CLUB - APS

- Facebook policy: <https://www.facebook.com/policy/cookies/>
- Twitter policy: <https://twitter.com/privacy>
- YouTube policy: <https://policies.google.com/technologies/cookies?hl=en-US>
- Instagram policy: <https://help.instagram.com/1896641480634370>
- LinkedIn policy: <https://www.linkedin.com/legal/cookie-policy>
- Google –policy: <https://policies.google.com/technologies/cookies?hl=en-US>

Unless, other specific browser settings, if You continue to use the Website, You will automatically give Your consent to the use of cookies. Your consent will be stored in a technical cookie for a period of one year.

7. *How we protect Personal Data.* Your Personal Data are treated strictly confidential and our Website maintains appropriate administrative, technical and physical safeguards and security measures to protect the Personal Data You provide on this Website against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use and any other unlawful forms of processing. To this purpose, MYLucchiniRS CLUB - APS uses several security techniques including secure servers, firewalls and encryptions, as well as physical safeguard of the locations where the data are stored. Your data will be kept for 2 years from the date of communication of such information and/or in any case for a period necessary for the pursuit of the abovementioned purposes and the fulfillment of any other legal compliance. All data are processed in mainly electronic format. Personal Data as well as any other information that can be associated, directly or indirectly, to a specific User, are collected and processed with measures that guarantee an appropriate level of security and confidentiality. Specific security measures are observed to prevent data loss, illicit or incorrect use and unauthorized access at the computers of the Company, the servers it manages and at virtual servers in the context of cloud services. The Company also takes into account, where provided, the security measures prescribed by specific legislation, including but not limited to, the provisions issued by the Authority for the protection of personal data or by any other specific regulations.

Access to Personal Data shall be granted only to authorized and trained staff. With reference to the Personal Data protection aspects, You are invited pursuant to Article 33 of the GDPR to report to MYLucchiniRS CLUB - APS any circumstances or events from which may arise a potential Personal Data breach in order to allow Us to make an immediate assessment of severity and intervene with the relevant corrective actions. You can reach Us by sending a communication to the contacts indicated in the following Art. 9. Please note that “personal data breach” shall mean “*a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed*”. The measures adopted by the Data Controller do not release in any way the User from paying the necessary attention for using the Website.

8. *Categories of recipients.* The data may be communicated to one or more subjects appointed only to the extent of the fulfilment of the purposes mentioned above, mainly consisting of:- data processors, collaborators of MYLucchiniRS CLUB - APS as well as third parties who provide the Association with IT and consultancy services;- all subjects whose rights of access to such data is recognized under regulatory provisions (e.g. police forces, judicial authorities, financial administration, finance guard, judicial offices, etc.).
9. *Contact – right to access and correct Your Personal Data.* You have the following rights as per CHAPTER III (Rights of the data subject) of the GDPR. Specifically, You have the following right: right of access, clarification, cancellation, notification, opposition, data portability as well as the rights to limit the processing of Your Personal Data. If You have any questions, comments or complaints about Us or how We process your Personal Data, or in case You wish not to be contacted by Us for anymore purposes, to obtain confirmation of the existence of Personal Data concerning You and be informed of their contents and origin, verify their accuracy, or else request that such data be supplemented, updated or rectified, please contact Us at the address, phone number or email below. Also, upon request in accordance with the applicable laws We will provide You with a summary of any personally identifiable information collected and retained by us regarding You. This Article also provides for the right to request erasure, anonymization or blocking of any data that is processed in breach of the law as well as to object in all cases, on legitimate grounds, to processing of the data. All requests should be emailed to:

*Data Controller:*  
MYLucchiniRS CLUB - APS

Via Giorgio Paglia, 41

24065 – Lovere (BG)

E-mail: [club@lucchinirs.com](mailto:club@lucchinirs.com)

We remind You that You can always lodge a complaint with the supervisory authority. The Italian authority, *Garante per la protezione dei dati personali*, can be reached at the following website: [www.garanteprivacy.it](http://www.garanteprivacy.it).