

Privacy & Cookie Policy

Privacy Policy

1. Preamble

This document describes (i) the methods used to manage the website <https://www.traversieassociati.com> (hereinafter, the “**Site**”) in relation to the processing of personal data of users who consult the Site, as well as (ii) the processing of personal data of those who, as clients or for any other reason, have relationships or contacts with Traversi & Associati or otherwise provide to Traversi & Associati their personal data, for the purposes and on the further terms and conditions of this information notice, or whose personal data are processed by Traversi & Associati (hereinafter “**Data Subjects**”). This information is provided pursuant to Section 13 of (EU) Regulation no. 2016/679 (hereinafter “**GDPR**”).

2. Data Controller

The Data Controller is Traversi & Associati owned by Stefano Traversi (the “**Data Controller**”), with registered office in Via Don Minzoni 52, 03100 Frosinone and Via Taro 35 Rome (Italy), e-mail: info@traversieassociati.com. The updated list of any data processors is available at the office of the Data Controller.

3. Place of Data Processing

Data relating to the web services of this Site, as well as data collected by Traversi & Associati for any other reason pursuant to this information notice, are processed at the office of the Data Controller and are handled by Mr. Stefano Traversi and/or internal technical personnel (if present/involved), specifically appointed in writing as Person in charge of the processing, pursuant to the GDPR and/or by personnel outside the Data Controller’s organisation, duly appointed, in writing, as Processor, pursuant to Section 28 of the GDPR.

All personal data are processed both in paper format and, mainly, in electronic format. Data will be stored in a form that allows the identification of the user only for the time strictly necessary to achieve the purposes for which they were originally collected and, in any case, within the limits provided by law. Specific security measures are observed to prevent the loss of data, their unlawful or improper use and unauthorised accesses to the data, in compliance with the provisions of the GDPR.

In order to assure that personal data are always accurate, updated, complete and pertinent, Data Subjects are kindly requested to report any changes therein to the following e-mail address: info@traversieassociati.com

4. Purposes of data processing

Personal data are not processed by the Data Controller, as:

- a) the website has the only purpose to provide to users to know in depth the activities, services (a company profile) of the Data Controller;
- b) Data Controller, could only and eventually receive contact' emails from users by the page named "Contacts". In this case, users clicking on Traversi & Associati' s email address link (for example: info@traversieassociati.com), implicitly and automatically provide to Traversi & Associati their own and prior consent to receive their personal data or Data Subjects.
- c) consequently, Data Controller could send communications by emails to Data Subjects;

So, the carrying out of the activities under letters a), b) and c) above does not require the Data Subject's consent, being the services or performances, in most cases, carried out at the direct request of the parties concerned pursuant to Section 6, paragraph 1.

5. Provision of data and consequences in case of failure to provide data

The provision of personal data for the above purposes is optional and the failure to provide said data will have the only consequence to prevent the Data Controller from managing and processing the Data Subject's requests or from sending the communications mentioned above.

6. Types of data processed

i. Navigation data

IT systems and software procedures set up for the correct functioning of this Site collect, during their normal operation, certain personal data, which are transmitted in the context of the use of Internet communication protocols. Said data are not collected in order to be associated with identified persons, but may, on account of their nature, allow users to be identified through processing and associations with other data held by third parties.

This category of data includes IP addresses or the domain names of computers used by persons accessing the Site, URIs (Uniform Resource Identifiers), the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the digital code indicating the state of the server's response (successful, error, etc.) and other parameters relating to the operating system and to the user's IT environment.

These data are used for the sole purpose of obtaining anonymous statistical information on the use of the Site and to verify its correct operation and are deleted immediately after processing. The data may be used to ascertain responsibility in the event of any IT crimes against the Site. This category includes also data processed by using cookies. For such purpose, please see the provisions of the Cookie Policy drawn up by Traversi & Associati, as per the following Section.

ii. Data provided voluntarily by users or collected from third parties

The optional, explicit and voluntary submission of an email address as well as of the relevant message to the addresses indicated on this Site, results in the collection of the sender's address and of other personal data that may be included in the request, which are necessary for responding to requests. In addition to the foregoing, further personal data (such as personal details, data concerning professional activity, position and/or role within the company, contact details such as business and/or private telephone number, e-mail address) provided to the Data Controller or anyway collected by the Data Controller from third parties, will be processed by the Data Controller in compliance with this information notice and within the limits imposed by the GDPR.

7. Recipients and Categories of Recipients

Data will not be circulated or assigned to third parties unless with the consent of the Data Subject. Should disclosure to third party suppliers or partners of Traversi & Associati be necessary for organisational or administrative requirements or to support the services provided, the Data Controller shall appoint said entities as processors pursuant to the GDPR. It is understood that the personal data of Data Subjects may be freely disclosed to third parties, such as the police, whenever this is permitted by the law or required by an order or decision of a competent authority.

8. Retention period

Personal data will be retained only as long as strictly necessary to achieve the purposes for which they had been collected and processed. Upon completion of the processing purpose, or in case of exercise of the right to object to the processing or withdrawal of the consent given, the Data Controller will be anyway entitled to further retain, in whole or in part, personal data for the purposes permitted by the GDPR (such as the need to enforce a right in court proceedings). As a rule, personal data will be stored for 2 years from their recording, or for 12 months for profiling purpose, without prejudice to the legitimate interest of the Data Controller pursuant to the GDPR, or any longer period that may be established in the future with reference to cases regulated from time to time by the applicable laws or by the competent authorities.

9. Rights of the data subjects

9.1 Right of access, erasure, restriction and data portability

Data Subjects have the rights as provided and reported from Section 15 to 20 of the GDPR. By way of example, each Data Subject may:

- a) obtain confirmation of the processing or non-processing of personal data;
- b) if personal data are being processed, obtain access to personal data and information relating to the processing as well as request a copy of the personal data;
- c) obtain the rectification of inaccurate personal data and have incomplete personal data completed;
- d) obtain the erasure of personal data concerning him or her where one of the grounds provided for by Section 17 of the GDPR applies;
- e) obtain restriction of processing where one of the cases provided for by Section 18 of the GDPR applies;
- f) receive personal data concerning him or her which he or she has provided to a controller in a structured, commonly used, machine-readable and interoperable format, and request their transmission to another controller, if technically feasible.

9.2 Right to object

Each Data Subject shall have the right to object at any time to processing of his or her personal data carried out to pursue a legitimate interest of Data Controllers. In case of objection, his or her personal data will no longer be processed, unless legitimate reasons exist for the processing, which override the interests, rights and freedoms of the Data Subject or for the establishment, exercise or defence of legal claims.

9.3 Right to withdraw consent

Where personal data are processed based on consent, each Data Subject has a right to withdraw at any time the consent given, without affecting the lawfulness of any processing based on said consent and carried out before the withdrawal. Consent may be withdrawn by writing an email to the address info@traversieassociati.com.

10. Right to lodge a complaint with a Supervisory Authority.

Every Data Subject has the right to lodge a complaint with a Supervisory Authority if he or she considers that the processing of personal data relating to him or her infringes his or her rights under the GDPR, according to the methods set out on the website of the Supervisory Authority accessible from the following link: www.garanteprivacy.it.

11. Updates

This Privacy Policy will be subject to updates. Therefore the Data Controller encourages Data Subjects who wish to know how their personal data are processed to regularly visit this page.

Cookie Policy

1. Preamble

This document has been drawn up by Traversi & Associati owned by Stefano Traversi, with registered office in Via Don Minzoni 52, 03100 Frosinone and Via Taro 35 Rome (Italy) (hereinafter, “T&A” or the “Controller”), as data controller for the processing of personal data, pursuant to Article 13 of Regulation (EU) 2016/679, collected during the navigation of the website www.traversieassociati.com (hereinafter, the “Site”).

The information below complies with the provision issued by the Italian Data Protection Authority on 8 May 2014, containing Simplified procedures for the information and to gain consent to use cookies (hereinafter, the “Cookies Provision”). T&A wishes to inform users that its Site uses cookies in order to improve their navigation experience.

2. Data Controller

The Data Controller is Traversi & Associati owned by Stefano Traversi, with registered office in Via Don Minzoni 52, 03100 Frosinone and Via Taro 35 Rome (Italy), e-mail info@traversieassociati.com. The updated list of any data processors is available at the Controller’s offices.

3. What are Cookies?

Cookies are small text files used to compile statistics concerning the use of the Site, to understand navigation experiences and the visitors’ possible requirements. Data collected through cookies are used to improve the navigation experience and the Site performance in the future. Cookies can be divided into two categories:

“first-party cookies”, set directly by the domain and/or editor of the website visited by the user; and/or

“third-party cookies”, set by a domain other than the one of the website being visited by the user.

Cookies may be further divided based on the purposes for which they are used: some of them offer an improved navigation experience, remembering visitors’ choices regarding specific settings (the so-called “technical cookies”) and hence ensure enhanced functionalities, while others allow to monitor the user’s navigation also in order to send advertisements and/or to offer services in line with the user’s preferences (“profiling cookies”).

a) First-party cookies

This Site uses technical cookies, and in particular:

Navigation or session cookies: which are required for normal browsing within the Site and to properly use the relevant services. They are not stored in the user’s computer and expire when the browser session is closed;

Functional cookies: which are solely used to improve and speed up the browsing of the Site, by remembering certain user’s choices (such as language preferences);

These types of cookies ensure the normal navigation and use of the Site, and allow to properly enjoy the contents published by T&A. Such cookies also allow to collect aggregate information on number of users and how they visit the Site. Cookies do not collect personal information on visitors, and personally identifiable data, if any, will not be stored. Users may refuse the use of cookies. However it should be noted that by totally disabling browser cookies, the user may not be able to use all interactive functions offered by the browser.

With regard to these cookies, the Cookies Provision imposes an opt-out regime. Users have the right to be informed, by means of this information notice prepared by the

Controller, and may as well decide to refuse their consent to the use of such instruments.

b) Third-party cookies

When a user is navigating some cookies that are not directly controlled by the Controller may be stored on his/her device, for example when the user visits a page including contents of a third party website. Moreover, the Site uses third-party profiling cookies. With regard to these cookies, the user's consent will be deemed to have been given every time the user clicks the "Accept" button present in the banner appearing in the homepage. In any case, users may subsequently withdraw their consent to the installation of said cookies.

Said cookies, the so-called "third party cookies", may be divided into:

Analytical cookies, used to collect and analyse statistical information on the number of users and on the visits to the Site (Google Analytics or similar). The disabling of such third party cookies does not affect the use of the Site;

Widgets/Plugin: some widgets and plugin made available by social networks (such as, by way of example only and without limitation, LinkedIn button or the display of YouTube videos directly within the websites where the user is navigating) may use their own cookies to facilitate the interaction with the reference site. Their disabling does not affect the use of the Site, unless for the possibility of quick sharing of contents and/or of displaying multimedia contents present therein;

Profiling cookies: used to collect information concerning preferences and habits expressed by the user during the navigation and hence to make advertisements published by third parties more captivating and focused.

This Site uses Google Analytics, a web analysis service provided by Google, Inc. (hereinafter, "Google"). Google Analytics uses cookies, which are text files placed on the devices used by users in order to analyse how they use the Site. Anonymous and aggregate information generated by the cookie on how users use the Site will be transmitted to and stored in Google servers in the United States.

Google will use such information for the purpose to track and examine the use of the Site, to compile reports on the Site activities for Site managers and to provide other services relating to the activities of the Site and to Internet use.

In order to understand how Google cookies actually work, as well as to be able to refuse one's consent to the use of such files, reference should be made to relevant information drawn up in such respect by Google, which can be found at the following link: http://www.google.com/intl/it_ALL/analytics/learn/privacy.html.

4. Giving consent

In line with the provisions of the legislation in force, when first accessing the Site (homepage or any other page thereof), T&A will ask for the user's consent, pursuant to Article 4, paragraph 1, of the GDPR, to send the cookies indicated above as follows:

- clicking the "Accept" button or the "X" closing button in the banner that will be displayed;
- clicking on any other element of the Site web page, even using the scroll, outside said banner;
- accessing at any time, both on the occasion of the first visit to the Site or afterward via the specific link provided by the Data Controller, this extended information notice ("Cookies Policy") and disabling the use of Cookies.

In all other cases and on any subsequent visit to the Site, the user may access this information (by clicking the "Cookies Policy" link at the bottom of the Site homepage) and refuse the consent to the installation of cookies in the ways described above. We repeat that the user's consent is only necessary for the installation of third-party cookies.

5. Limiting or disabling the use of Third-party Cookies

The Site uses Cookibot, to allow users to manage cookie preferences, as well as to amend and/or remove any third-party profiling and analytical cookies.

6. Rights of access, to erasure, to restriction and to data portability

Data subjects have the rights under Articles 15 to 20 of the GDPR. By way of example, every data subject will have the right :

- a) to obtain confirmation as to whether or not Personal Data are being processed;
- b) where Data are being processed, to obtain access to the Data and to the information relating to the processing as well as to request a copy of the Data;
- c) to obtain the rectification of inaccurate Data and to have incomplete Data completed;
- d) where any of the conditions provided for by Article 17 of the GDPR exists, to obtain the erasure of the Data concerning him or her;
- e) in the cases provided for by Article 18 of the GDPR, to obtain restriction of processing;
- f) to receive the Data concerning him or her in a structured, commonly used and machine-readable format, and to transmit it to another controller, if technically feasible.

7. Right to object

Every data subject has the right to object at any time to the processing of Data concerning him or her carried out for the purposes of the legitimate interests pursued by the controllers. In case of objection, the controller shall no longer process his or her Data unless the controller demonstrates legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

8. Right to withdraw consent

If the consent is necessary for the processing of the Data, every data subject shall also have the right to withdraw his or her consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal. The consent may be withdrawn by writing an email to the address: info@traversieassociati.com.

9. Right to lodge a complaint with the Supervisory Authority

Moreover, every data subject has the right to lodge a complaint with the Data Protection Supervisor if the data subject considers that his or her rights under the GDPR are infringed, according to the methods indicated on the Data Protection Supervisor website at the address: www.garanteprivacy.it.

10. Following the cookies activated in the site www.traverseassociati.com:

Cookie Name	Purpose	Duration	Cookie Type
XSRF-TOKEN	Used for security reasons	Session	Essential
hs	Used for security reasons	Session	Essential
svSession	Used in connection with user login	2 years	Essential
SSR-caching	Used to indicate the system from which the site was rendered	1 minute	Essential
_wixCIDX	Used for system monitoring/debugging	3 months	Essential
_wix_browser_sess	Used for system monitoring/debugging	session	Essential
consent-policy	Used for cookie banner parameters	12 months	Essential
smSession	Used to identify logged in site members	Session	Essential
TS*	Used for security and anti-fraud reasons	Session	Essential
bSession	Used for system effectiveness measurement	30 minutes	Essential
fedops.logger.sessionId	Used for stability/effectiveness measurement	12 months	Essential
wixLanguage	Used on multilingual websites to save user language preference	12 months	Functional