



By means of this page, RGI S.p.A., with head office in (20124) Milan, Via S. Gregorio, 34, (the “Data Controller”) provides information on how the Website and its Blog are managed in relation to the processing of the personal data of the data subjects (users) who visit it, with direct access from the home page or from pages within the Website. This information notice is also provided in accordance with Articles 13 and 14 of the General Data Protection Regulation (GDPR) to those who interact with the web services of the Data Controller, which can be accessed electronically from the address [www.rgigroup.it](http://www.rgigroup.it) or [www.rgigroup.com](http://www.rgigroup.com) and <https://blog.rgigroup.com>, (hereinafter also referred to collectively as the “Websites”) and also constitutes an information notice drawn up in compliance with the aforementioned Regulation, as well as with the applicable legislation and the provisions of the applicable supervisory authority.

## **DATA CONTROLLER - DATA PROTECTION OFFICER**

The data controller is RGI s.p.a. with head office at Via San Gregorio 34, 20124 Milan. The Data Protection Officer can be contacted at [dpo@rgigroup.com](mailto:dpo@rgigroup.com)

## **PROCESSED DATA - WHERE WE TAKE YOUR DATA FROM**

### **Browsing data**

Referring for cookies to what is stated below, the Data Controller informs you that the computer systems and software procedures used to operate the Websites acquire, in the course of their normal operations, certain personal data whose transmission is implicit in the use of Internet communication protocols. This information is not collected in order to be associated with identified data subjects, but, by its very nature, it could make it possible to identify Users by means of processing and cross-referencing with data held by third parties. This category of data includes IP addresses or domain names of the computers used by the Users who connect to the Website, the URI (Uniform Resource Identifier) addresses of the resources requested, 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 user’s operating system and computer environment. These data are used in order to obtain information on the use of the Websites and on the preferences expressed by the user when browsing the web and to check that the Websites are working properly.

### **Data provided directly by the user**

The optional, explicit and voluntary sending of e-mails to the addresses indicated on these Websites entails the subsequent acquisition of the sender’s address, which is necessary in order to reply to requests, as well as any other personal data included in the request (for example, when requesting information or explanations by writing to the e-mail addresses on the Websites). Specific summary information notices will be reported or displayed on the pages of the Websites set up for particular services on demand, which may entail the processing of personal data (thus, by way of example, the provision of personal data through forms or similar means, as may be provided for in the sections of the Website, entails that the data provided are processed in order to process the user’s requests; for example, when one spontaneously sends a CV in order to put oneself forward as a candidate or when one fills in the online form to submit one’s application for a specific job position).

## **WHY AND FOR HOW LONG WE PROCESS YOUR DATA - PURPOSE AND LEGAL BASIS OF DATA PROCESSING; STORAGE PERIOD**

**1) To respond to your requests for information and/or clarification.** We may use your e-mail or telephone number, your name, your company name and your role in the company, to assist you following your request for information made by filling in the appropriate form on the Website, or when you write to us through the chat on the Website, or when you send an e-mail to the address on the blog.



The legal basis for this processing is the need to perform a request by the data subject.

The retention period of your data in connection with this processing is equal to the time required to process your request (it being understood that if other processing operations are applicable, the retention period is the one indicated in relation to such processing operations in this information notice).

**2) To prevent or control unlawful conduct or to protect and enforce rights.** For example, we may use your data to prevent infringement of our intellectual property rights (e.g. counterfeiting of our and/or our partners' trademarks) or theft or other unlawful acts, as permitted by applicable law.

The legal basis for such processing is the legitimate interest of the data controller.

The retention period of your data is equal to the time reasonably necessary to assert our rights from the moment we become aware of an offence or a potential offence.

**3) For marketing purposes.** Subject to your consent, we may contact you by e-mail, telephone or other means with commercial communications or newsletters regarding upcoming events, initiatives, products and services.

The legal basis for this processing is your explicit consent.

The retention period for your data is 24 months from when the consent was given.

## **NATURE OF DATA PROVISION**

Apart from what has been specified for browsing data and what has been said for cookies, the user is free to provide the personal data indicated in the forms, enquiry forms or in any case data that are indicated in contacts with the Data Controller to request information, for other communications, etc. Failure to provide them for purposes 1-2 may result in the impossibility of obtaining what has been requested. For purpose 3, the provision of data is optional; refusal will not affect the other purposes. The data subject may revoke his or her consent at any time, but this will in no way affect the processing carried out prior to such revocation.

## **PROCESSING METHODS**

Personal data are processed by automated means for the time strictly necessary to achieve the purposes for which they were collected. Technical data are stored on the Data Controller's servers. Specific security measures are taken to prevent the loss of data, their unlawful or incorrect use, and any unauthorised access.

## **WITH WHOM WE SHARE YOUR DATA - RECIPIENTS OF PERSONAL DATA**

We may give access and disclose your data to third parties, including subsidiaries belonging to the RGI group, so that they can provide services to us, after having entered into an agreement with them in accordance with Article 28 GDPR to protect your data. These parties only come into possession of the data necessary for the performance of their duties and may only use them in order to perform such services on our behalf, or to comply with legal requirements. You can find out the details of these data controllers under Article 28 GDPR by contacting the Data Controller.

Where we believe we need to do so in order to comply with legal obligations or for the purpose of our judicial protection or that of third parties, we may share the requested data with a governmental or judicial body, including for the purpose of limiting or preventing fraud and other unlawful acts.



## **TRANSFERS OUTSIDE EU**

In the case of transfer of personal data outside the European Union, such transfer will take place in accordance with the provisions of the relevant applicable legislation, in particular Articles 45-47 of the GDPR, and in the presence of appropriate safeguards (e.g. an adequacy decision adopted by the European Commission, or the prior stipulation of “Standard Contractual Clauses” between the supplier and RGI S.p.A.).

## **MINORS**

Our Websites are not intended for minors under the age of 18, but for an adult audience. If you are a parent or guardian and you think your child has transmitted data to us, you may contact us.

## **SECURITY MEASURES**

We take security measures to protect your data. The standard security measures we use depend on the type of data we process and meet the requirements of the law and the standards of European government agencies.

## **DATA SUBJECT RIGHTS**

You may contact RGI S.p.A. to request access to, rectification, erasure or restriction of your personal data, to object to their processing and to request their portability; you may also withdraw your consent at any time (this will not affect the lawfulness of the processing based on the consent given before the revocation).

When you exercise your right of access, you have the right to know whether your data are being processed, what the purpose of the processing is, what categories of data are being processed, who the recipients or categories of recipients are to whom your data are disclosed (and, if they reside in a third country on the basis of what safeguards), the retention period of your data (or the criteria for determining the retention period), whether any automated processing is taking place (e.g. by means of profiling) and what the logic of such processing is, and the origin of the data (if not initially collected by us).

You have the right to lodge a complaint with the Italian Data Protection Authority and to ask the Data Controller, at any time, for information about the data processors and the persons authorised by the data controllers to process your data.

You can exercise your rights by contacting the Data Controller or the Data Protection Officer at [dpo@rzigroup.com](mailto:dpo@rzigroup.com)

## **WHAT WE DO IF WE CHANGE THIS NOTICE**

We may make changes to our privacy policy. We will notify you of such changes. We will also publish an updated version on our Websites. It will have a different date and version number from those shown below. Please check our Websites periodically for updates.



## **COOKIE POLICY**

Some general information on cookies is given below. Cookies are small text strings that websites visited by the user send to the user's terminal (usually to the browser), where they are stored and then retransmitted to the same websites the next time the same user visits them. In the course of browsing on a site, the user may also receive cookies on his/her device that are sent from different websites or web servers ("third parties"), on which certain elements on the Website that the user is visiting (such as, for example, images, maps, sounds, specific links to pages of other domains) may reside. Cookies used by the Websites and their purposes. The Websites use cookies, which have the purpose to allow certain sections to function properly, e.g. to access the reserved area of the Website ("technical cookies"), to provide certain customisation functionalities ("functional cookies"), to improve the general browsing experience of the Websites.

With respect to the information collected by the cookies installed directly by the Websites, please note that the data controller is RGI S.p.A. with head office in Via San Gregorio, 34 - 20124 MILAN - ITALY. The Data Protection Officer can be contacted at [dpo@rgigroup.com](mailto:dpo@rgigroup.com);

The Websites use the following categories of cookies:

- **Technical** (or browsing) cookies, which contribute to the functioning of the Websites, e.g. to allow you to browse between pages and access the reserved area of the Website; the legal basis of the processing underlying the use of these cookies is the provision of the service by RGI S.p.A.; the storage period of these cookies starts from the date of the first access to the Websites until the end of the browsing session.
- **Functional cookies**, which enable specific features of the Website and store your preferences (such as language), in order to improve your browsing experience; the legal basis for the processing underlying the use of these cookies is the consent of the data subject; the storage period of these cookies starts from the date they are enabled on the Website until they are disabled, and in no case will they be stored for more than 24 months. The user can accept and disable - at will - these cookies from the table below, as well as from the cookie management tool.

Below is a summary table of the cookies **used on the Website**

<b>Cookie Name</b>	<b>Type</b>	<b>Domain</b>	<b>Duration</b>	<b>Description</b>
K-PHPSESSID-mjeiflie	Technical - session	rgigroup.it rgigroup.com	End of session	Used to track Session
PHPSESSID	Technical - session	rgigroup.it rgigroup.com	End of session	Used to track Session
_fbp	Social Media Plug-in	Facebook	Pixel	Used to track the current Session ID
Jivochat cookies (jv_pages_count_, jv_visits_count_, jv_enter_ts_)	Technical	Jivochat.com	Persistent cookie	Used to track the current Session ID
bcookie	Social Media Plug-in	Linkedin	Pixel	Used to track the current Session ID
Google reCAPTCHA (_NID)*	Technical	Google.com		Used to track the current Session ID



			6 months after use	
YSC	Technical	Youtube	Pixel	Used to track Session
VISITOR_INFO1_LIVE	Technical	Youtube	Pixel	Youtube (bandwidth measurement)
PREF	Technical	Youtube	Pixel	Youtube
auto_load_stats, clips, embed_preferences, has_logged_in, ki_r, ki_t, optimizelyBuckets, optimizelyEndUserId, optimizelySegments, player, site_settings, stats_end_date, stats_start_date, void, __umtm_player	Technical - session	vimeo.com	Pixel	Used to track the current Session ID
_ga	Technical -	Vimeo.com	Pixel	Analytics Vimeo
AnalyticsSyncHistory	Social Media Plug-in	Linkedin	Pixel	Used to track the current Session ID
lidc	Social Media Plug-in	Linkedin	Pixel	Used to track the current Session ID
UserMatchHistory	Social Media Plug-in	Linkedin	Pixel	Used to track the current Session ID
li_gc	Social Media Plug-in	Linkedin	Pixel	Used to track the current Session ID

Below is a table summarising the cookies **used in the Blog**

Cookie Name	Type	Domain	Duration	Description
AnalyticsSyncHistory	Social Media Plug-in	Linkedin	Pixel	Used to track the current Session ID
lidc	Social Media Plug-in	Linkedin	Pixel	Used to track the current Session ID
UserMatchHistory	Social Media Plug-in	Linkedin	Pixel	Used to track the current Session ID
li_gc	Social Media Plug-in	Linkedin	Pixel	Used to track the current Session ID
lang	Social Media Plug-in	Linkedin	Pixel	Used to track the current Session ID
bcookie	Social Media Plug-in	Facebook	Pixel	Used to track the current Session ID
Fr	Social Media Plug-in	Facebook	Pixel	Used to track the current Session ID
YSC	Technical	Youtube	Pixel	Used to track Session
VISITOR_INFO1_LIVE	Technical	Youtube	Pixel	Youtube (bandwidth measurement)
_stid	Technical - Wordpress	blog.rgigroup.com	End of session	Used to track Session



_stidv	Technical - Wordpress	blog.rgigroup.com	End of session	Used to track Session
wordpress_test_cookie	Technical - Wordpress	blog.rgigroup.com	End of session	Used to track Session



The Websites may also contain hyperlinks / widgets / banners referring to external sites and/or platforms operated by third parties. For information on the purposes, type and manner of collection, processing, use and storage of Personal Data by these platforms, please refer to their respective privacy policies.

In addition to the above, you can manage your cookie preferences directly within your browser and prevent - for example - third parties from installing cookies. You can also use your browser preferences to delete cookies installed in the past, including any cookies in which you may have saved your consent to the installation of cookies by our Websites. You can find information on how to manage cookies in your browser at the following addresses:

**Google Chrome:** <https://support.google.com/chrome/answer/95647?hl=en-GB&sjid=3677783397258143046-EU>

**Mozilla Firefox:** <https://www.mozilla.org/en-US/privacy/websites/>

**Apple Safari:** <https://support.apple.com/en-gb/guide/safari/sfri11471/mac>  
<https://www.apple.com/legal/privacy/en-ww/cookies/>

**Microsoft Windows Explorer:** <https://support.microsoft.com/en-gb/windows/delete-and-manage-cookies-168dab11-0753-043d-7c16-ed5947fc64d>