

COOKIE POLICY

This extensive circular letter specifically and analytically describes how to use the cookies given on the site, <http://www.sugherificiocastello.com/>, for the personal data processing of identified or identifiable users who enter the site.

The circular contains all the elements provided by Art. 13 of the EU Regulation 2016/679 and is laid out in compliance with the General Provision of the Supervisory Authority dated 8.5.2014.

DATA CONTROLLER (AND DATA PROCESSOR)

The Data Controller is **SUGHERIFICIO CASTELLO SRL** – Via Casa Perizzi, 17 - 42035 Castelnuovo Ne' Monti (RE) - Italy, VAT Number: IT 02563480355, which avails of its own processing managers or those of external processing companies.

1) WHAT ARE COOKIES AND THEIR PURPOSES

Cookies are small text files which the sites visited by the user send directly to the user's computer, where they are memorized to be then retransmitted to the sites themselves on the same user's next visit (so-called **first-party cookies**). When surfing a site, the user may receive on his computer also cookies of sites or of different web servers (so-called **third-party cookies**); this occurs because the web site visited may contain elements like images, maps, and sounds, specific links to web pages of other domains that reside on different services other than those on which the page requested is found. In other words, these are cookies that are set on a web site other than the one actually visited.

The duration of the cookies may be limited to a single surfing session on the browser (so-called **session cookies**), and in this case automatically deactivate when the visitor closes the browser; or they may also have a preset expiry, and in this case, will remain memorized and active in the user's hard disk up to the given expiry date, continuing to gather information during the various surfing sessions on the browser (so-called **permanent cookies**).

The cookies are used for different functions. Some are necessary to allow you to surf on the Site and use its features (so-called **technical cookies**). Others are used to obtain statistical information, whether or not in aggregate form, on the users that access the Site and on how the Site is used (so-called **monitoring** or **analytical cookies**). Lastly, they are used to track a consumer profile of the user and allow him/her to view advertisements on the Site, which may be interesting and in line with the user's taste and consumption habits (so-called **profiling cookies**).

To learn more in detail about these different categories of cookies, please continue reading this circular. Discover how they work and their purposes, and freely choose whether to consent or block their usage.

2) FIRST-PARTY TECHNICAL AND ANALYTICAL COOKIES

These are cookies installed directly by the site visited. The technical cookies serve to carry out the surfing or to furnish a service requested by the user. They are not used for further aims and are usually installed directly by the web site controller. Without turning to such cookies, some operations could not be done or would be more complex and/or less safe, like for example the activities for which the cookies, which allow to carry out and maintain the user identification in the session, are indispensable.

Analytical cookies are necessary to gather user information and statistics and help to assess the surfing experience. Without using these cookies, the site owner cannot gather information and feedback regarding the surfing, which would be useful in improving future experiences.

Cookie name	Cookie category	Cookie function	Privacy policy
_cml_language	Technical cookie	Session cookie that automatically sets the site display language.	
__utmt	Technical cookie	Used to regulate the flow of requests.	https://policies.google.com/?hl=it&gl=it
__utma	Technical cookie	Used to distinguish the user and the session.	https://policies.google.com/?hl=it&gl=it
__utmb	Technical cookie	Used to determine new sessions/visits to the site.	https://policies.google.com/?hl=it&gl=it
__utmc	Technical cookie	Used to guarantee functionality of the cookies.	https://policies.google.com/?hl=it&gl=it
__utmz	Analytical cookie	Detects the source through which the user reached the site.	https://policies.google.com/?hl=it&gl=it

3) THIRD-PARTY ANONYMISED ANALYTICAL COOKIES

The following third-party analytical cookies are installed on the Site without the prior consent of the user, because they are less aggressive since they are

anonymised, and as such are less invasive and third parties cannot access the disaggregated analysis data at IP address level (in other words, by using these cookies, third-party subjects cannot trace the user's identity).

The website does not use third-party anonymised analytical cookies.

3.A) NON-ANONYMISED THIRD-PARTY ANALYTICAL COOKIES

Other third-party analytical cookies instead, are installed on the Site only with the user's prior consent, because they are not anonymised, and thus third parties may access disaggregated analysis data at IP address level (in other words, by using these cookies, third-party subjects may track the user's identity through the IP address).

The site does not use non-anonymised third-party analytical cookies.

4) PROFILING COOKIES

The purpose of profiling cookies is to create user profiles and are used to send advertisement messages in line with the preference shown by the same in the field of network surfing . Due to the particular invasiveness which such device may have within the user's private sphere, the European and Italian norms provide that the user has to be suitably informed on the use of these and **thus express his/her valid consent**: the use of said cookies in fact requires the user's prior consent through the banners viewable to the users before the first visit to the Site.

The site does not use first or third-party profiling cookies.

5) SOCIAL BUTTON AND WIDGET

Social buttons are particular "buttons", displayed on the Web site depicting the icons of social networks (example, Facebook and Twitter) and allow users browsing to interact with a click directly with social platforms.

Widgets are spaces where, through a graphic interface, the user can interact with an application, a software or another web site. The use of these interfaces is subject to the terms and conditions of use of the service provider, also on personal data. Here is the list of widgets available on the site:

[Google Maps](#).

The social buttons displayed on the site are links to the holder's account on social networks depicted. By using these buttons are not installed on the site and third-party cookies.

[Facebook](#), [Google +](#).

6) TRACKER

Trackers are useful tools and technologies to deliver engaging and interlinked experiences, composed of snippets that send information about site users to other companies.

The tracker can use the information you submit for a variety of purposes, like sending personalized advertising material, analyze user behavior or provide services within the site, such as access to social networks or areas comments, and other features. In most cases, the information collected is anonymized information or pseudonomized; Sometimes the personal data do not undergo such treatment, which means they can directly identify a specific user.

The use of this technology could slow down the browsing experience, and, above all, make it less certain the confidentiality of user personal data.

The website uses the following tracker:

Name Tracker (Owner)	Type	Link to Privacy Policy
Google Analytics (Google)	Site analysis	http://www.google.com/intl/en/policies/privacy/

7) OPTIONAL SUBMISSION

Many of the data submissions of the user done through cookies are optional. To see how one can handle the cookies according to the browser used (Edge, internet Explorer, Mozilla, Safari, Chrome), you can connect to the site aboutcookies.org to erase them, or to the direct addresses of the single producers of the browsers:

[Chrome](#); [Firefox](#); [Internet Explorer](#); [Opera](#); [Safari](#); [Edge](#)

8) PROCESSING METHOD AND RETENTION TIME

The personal data are processed with automatized instruments, for the time strictly necessary to pursue the objectives explained earlier.

Specific security measures are adopted to prevent the loss of the data, their illicit or incorrect use and unauthorised access.

9) DATA SUBJECTS' RIGHTS

As per Regulation (Articles 15 to 22 GDPR) the rights of the data subject are summarised hereunder:

- request access, rectification, erasure, limitation, oppose the processing of your data,
- revoke the consent any time;
- send complaints to a supervisory authority.

The specific complaint to the Data Controller can be presented by contacting the same e-mail address:

info@sugherificiocalcastello.com

You are entitled to file your complaints with the control authority at the Supervisory Authority address for the protection of personal data, by sending a registered letter with return slip to: Piazza Monte Citorio no. 121, 00186 ROMA; or a certified e-mail to the address protocollo@pec.gdpd.it, or with the control authority of another EU member country.

This circular was updated on 11 October 2018.