

Route220 S.r.l.

Via G. Carducci n.12
20123 – Milan (MI)
VAT 02206590164



Privacy Policy concerning the processing of personal data pursuant to Articles 13-14 of (EU) Regulation 2016/679

Data subject: Web Site Advisors.

Route220 S.r.l. in its capacity of Data Controller with regard to the processing of your personal data pursuant to (EU) Reg. 2016/679 (hereinafter the 'GDPR'), hereby informs you that the said regulation protects data subjects with regard to the processing of their personal data and that the said processing will take place in a fair, lawful, transparent manner which protects your privacy and your rights.

Your personal data will be processed in accordance with the terms of the above legal provisions and the confidentiality obligations contained therein.

Purposes and legal basis of processing: specifically, your data will be processed for the following purposes, relating to the fulfilment of legal or contractual obligations:

- purposes of statistical research/analysis on aggregate or anonymous data, without therefore the possibility of identifying the user, aimed at measuring the operation of the Web Site, measuring traffic and assessing usability and interest.

Your data will also be used for the following purposes related to the execution of measures related to contractual or pre-contractual obligations:

- purposes related to the execution of a contract to which you are a party or to the execution of pre-contractual measures taken at your request (ex: request contact through the form "Contacts" etc.);
- purposes necessary to ascertain, exercise or defend a right in a court of law or whenever judicial authorities exercise their jurisdictional functions;
- purposes of evolved navigation or personalized content management.

Processing procedures. Your personal data may be processed by the following ways:

- Using electronic calculators running self-managed softwares or directly engineered;
- Using electronic calculators running softwares managed by third parties;
- temporary treatment in anonymous form.

All data are processed in compliance with the procedures specified in Articles 6 and 32 of the GDPR and with the adoption of the appropriate security measures required.

Your data will only be processed by staff specifically authorized by the Data Controller, and specifically by the following categories of staff:

- Programmers and Analysts;
- Administration Office;
- Marketing Office.

Disclosure. Your data may be disclosed to external entities for the correct management of the relationship and specifically for the following categories of recipients, including all the duly designated Data Processors:

- Google: Advertising Service, Advertising Target, Analytics/Masurement, Content Personalization, Optimization;
- To the subjects necessary for the provision of services offered by the website, including, by way of example, the sending of e-mails and the analysis of the functioning of the Site who typically act as Route220 (Evway) data controllers.

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Distribution. Your personal data will not be distributed in any way.

Your personal data may also be transferred, only for the aforesaid purposes, to the following countries:

- some of your Personal Data is transferred to Recipients who may be located outside the European Economic Area. Route 220 S.r.l. (Evway) ensures that the electronic and paper-based processing of your Personal Data by Recipients is carried out in compliance with the Applicable Law. Transfers are based alternatively on an adequacy decision or on Standard Model Clauses approved by the European Commission.

Data Storage Period. In accordance with the principles of lawfulness, limitation of purpose and minimization of data, pursuant to Art. 5 of the GDPR, the data storage period for your personal data is established as a period of time not exceeding the purposes for which the data were collected and processed and complying with the compulsory times required by law.

Data Controller: Data Controller, as defined by the Law, is Route220 S.r.l. (Via G. Carducci n. 12 - 20123 Milano (MI), VAT n. 02206590164) in the person of its legal representative pro tempore.

Cookie management: if you have any doubts or concerns about the use of cookies, you can always take steps to prevent them from being set and read, for example by changing the privacy settings in your browser to block certain types of cookies.

Because every browser - and often different versions of the same browser - differ considerably from one another, if you prefer to act preferences of your browser, you can find detailed information on how to do this in the help section of your browser. For an overview of how to do this for the most common browsers can be found at www.cookiepedia.co.uk.

Advertising companies also allow you to opt out of receiving targeted ads if you wish. This does not prevent cookies from being set, but it does it does stop the use and collection of certain data by those companies.

For more information and opt-out options, please visit www.youonlinechoices.eu/.

Owner: the owner of the data processing, in accordance with the Law, Route220 S.r.l. (Via G. Carducci n. 12 - 20123 Milano (MI), VAT n. 02206590164) in the person of its legal representative.

You have the right to obtain from the owner the cancellation (right to be forgotten), the limitation, the updating, the rectification, the portability, the opposition to the processing of personal data concerning you, as well as in general you can exercise all the rights provided by Articles. 15, 16, 17, 18, 19, 20, 21, 22 of the GDPR.

You are entitled, by application to the Data Controller, to obtain the erasure (right to be forgotten), restriction, updating, rectification and portability of your personal data, to object to their processing, and in general to exercise all your rights under articles 15, 16, 17, 18, 19, 20, 21 and 22 of the GDPR.

Regulation (EU) 2016/679: Articles 15, 16, 17, 18, 19, 20, 21, 22 - Rights of the Data Subject

1. The data subject has the right to obtain confirmation as to whether or not personal data concerning him or her exist, regardless of their being already recorded, and disclosure of such data in intelligible form, and the right to lodge a complaint with the supervisory Authority.

2. The data subject has the right to be informed of:

- a) The source of the personal data;
- b) The purposes and methods of processing;
- c) The logic applied if the data are processed by electronic devices;
- d) The identification data concerning the Data Controller, the Data Processors and the representative designated as per Article 5.2;
- e) The entities or categories of entity to whom or which the personal data may be disclosed and who or which may get to know said data as designated representative in the State's territory, as data processors or as persons in charge of the processing.

3. The data subject is entitled to obtain:

- a) The updating, rectification or, where interested therein, integration of the data;
- b) The erasure, anonymization or blocking of data that have been unlawfully processed, including data whose retention is not necessary for the purposes for which they were collected or subsequently processed;
- c) Certification to the effect that the operations as per letters a) and b) have been notified, as also related to their contents, to the

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entities to whom or which the data were disclosed or disseminated, unless this requirement proves impossible or involves a manifestly disproportionate effort compared to the right that is to be protected;

d) The portability of the data.

4. The data subject has the right to object, in whole or in part:

- a)** On legitimate grounds, to the processing of personal data concerning him/her, even though they are relevant to the purpose of the collection;
- b)** To the processing of personal data concerning him/her, where it is carried out for the purpose of sending advertising materials or direct selling or else for the performance of market or commercial communication surveys.