

## COMPANY WEBSITE POLICY PRIVACY

EU Regulation 2016/679 of 27 April 2016 on the “Protection of natural persons with regard to the processing of personal data and on the free movement of such data” (the so-called “General Data Protection Regulation” or “Regulation”) provides for the protection of personal data, the processing of which must be carried out in accordance with the fundamental rights and freedoms, with particular reference to the confidentiality rights.

In accordance with Art. 13 and Art. 14 of the Regulation, Copan Italia S.p.A., with registered office at via F. Perotti 10, 25125 Brescia (Italy) (hereafter referred to as “Copan”), in the capacity of Data Controller of the personal data managed through company website [www.copangroup.com](http://www.copangroup.com) (or also “Site”) hereby informs you that the processing of your personal data will be based on the principles of correctness, lawfulness and transparency, protecting your confidentiality and your rights.

Before providing any personal data to the Data Controller please read this Privacy Policy carefully as it contains important information on the protection of your data.

In particular, in accordance with Art. 13 of the regulation, please note the following points:

### 1. Identity and contact details of Data Controller

The Data Controller for your personal data is Copan Italia S.p.A., with registered office at via Perotti 10, 25125 Brescia (Italy).

### 2. Contact details of Data Protection Officer

Copan has not deemed it necessary to designate a Data Protection Officer (DPO) since the data processing carried out does not fall within the requirements for designation of the DPO specified under Art. 37 of the Regulation.

The following e-mail address may be used by the data subjects as a communication channel with the Data Protection Officer regarding privacy issues [privacy@copangroup.com](mailto:privacy@copangroup.com)

### 3. Purposes of processing

The processing of your personal data by Copan will be carried out for purposes related to the management and administration of the company website.

In particular, the processing of your personal data will be carried out to

- enable browsing of the website
- statistically analyse the visits to the website in an aggregate manner

### 4. Legal basis of processing

The legal basis is represented by the legislation on Simplified Arrangements to Provide Information and Obtain Consent Regarding Cookies of 8 May 2014.

In view of the type of data, prior opt-in consent by the user is not requested on the condition that the user is provided with simplified means to opt-out.

### 5. Method of processing

The personal data is processed with automated systems for the time strictly necessary to achieve the purposes for which it has been collected.

Specific security measures are complied with in order to prevent loss of data, illegal or incorrect use and unauthorised access.

## 6. Personal Data Subject to Processing

*Browsing data:* the IT systems and the software procedures provided for operation of this website acquire some personal data (so-called log files), during their normal operation of which the transmission is implicit in the use of the Internet communication protocols. This information is not collected to be associated with identified data subjects, but it could, due to its very nature, through processing and association with data held by third parties, allow the users to be identified. This data category includes the IP addresses or the domain names of the computers used by the users who connect to the Site, the *URLs (Uniform Resource Identifiers)* of the requested resources, the time of the request, the method used for submitting the request to the server, the size of the file obtained in reply, the numerical code indicating the status of the reply given by the server (good result, error, etc.) and other parameters relative to the operating system and the user's IT environment. This data is only used to obtain anonymous statistical information regarding use of the Site and to check the correct operation. The data could be used for checking responsibilities in the event of hypothetical cybercrimes harmful for the site and may be exhibited to the Judicial Authorities, if this is specifically requested.

*Data provided voluntarily by the user:* the facultative, explicit and voluntary sending of e-mails to the addresses indicated on this site results in the subsequent acquisition of the sender's address, which is necessary to reply to the request, as well as any other personal data entered in the message.

Specific summarising information will be progressively shown or displayed in the pages of the site prepared for particular services upon request.

## 7. Categories of recipients of personal data

The data collected via internet will not be divulged or communicated to third parties who have not been appointed.

## 8. Personal data storage

The personal data processed for the purposes listed in this privacy policy will be stored for the time strictly necessary to achieve these purposes.

## 9. Rights of the data subject

You can exercise your rights at any time in accordance with Article 13, point b) and Articles 15, 16, 17, 18 and 20 of the Regulations by sending a registered letter to Copan Italia S.p.A. – Legal Department– via F. Perotti 10, 25125 Brescia, Italy or an e-mail to [privacy@copangroup.com](mailto:privacy@copangroup.com).

In particular, in the capacity of data subject, you may request:

1. access to your personal data, in accordance with the provisions of Article 15 of the Regulation;
2. rectification of your personal data, in accordance with the provisions of Article 16 of the Regulation;
3. erasure of your personal data ("*right to be forgotten*"), in accordance with the provisions of Article 17 of the Regulation;
4. restriction of processing of your personal data, in accordance with the provisions of Article 18 of the Regulation.

Lastly, you may also object to the processing of your personal data at any time, in accordance with Article 21 of the Regulation, in the event of any situations specified under Article 6, paragraph 1, points e) and f) of the Regulation.

#### **10. Complaint to a Supervisory Authority**

Lastly, in accordance with Article 77 of the Regulation, it should be noted that you have the right to lodge a complaint with the Supervisory Authority (Personal Data Protection Commission) if you consider that the processing of your personal data infringes the Regulation.

#### **11. Nature of processing and mandatory requirement to provide personal data**

Much of the data requested is necessary (also in the execution of obligations deriving from legal regulations) for setting up and continuing the business relationship. In some cases, failure to provide the data may result in failure to continue the relationship.

#### **12. Existence of automated decision-making processes for data processing**

It should be noted that there is no type of automated decision-making process for the personal data processing, in accordance with Article 22 of the Regulation.

### **COOKIES POLICY**

This cookies policy refers solely to the company website [www.copangroup.com](http://www.copangroup.com) ("Site") and must be considered as an integral part of the corresponding Privacy Policy.

#### **DEFINITIONS, CHARACTERISTICS AND APPLICATION OF THE REGULATIONS**

Cookies are small text files which the websites visited by the user send to and store on the user's computer or mobile device, for retransmission to the same websites at the next visit.

Thanks to the cookies a site remembers the user's actions and preferences (such as, for example, login data, chosen language, font size, other display settings, etc.) so that they do not need to be indicated again when the user returns to the site or browses from one page of the site to another. The cookies are used to carry out information authentication, monitor sessions and store information relating to the activities of the users who access a site and can also contain a unique identification code which allows the user's browsing to be tracked inside the site itself for statistics or advertising purposes.

Whilst browsing a site the user may also receive cookies on his/her computer or mobile device from sites or web servers different from the one being visited (so-called third-party cookies).

It may not be possible to carry out certain operations without the use of the cookies, which in some cases are therefore technically necessary for the operation of the site.

There are various types of cookies, depending on their characteristics and functions, and these can remain in the user's computer or mobile device for different lengths of time: session cookies, which are automatically deleted when the browser is closed; persistent cookies, which remain on the user's equipment until a predetermined expiry date.

In accordance with the current regulations in Italy, explicit consent for the use of cookies is not always requested. In particular, this consent is not requested for the use of "technical cookies", that is, those used only to carry out the transmission of a communication on an electronic communication network, or to the extent strictly necessary to provide a service explicitly requested by the user.

In other words, these are cookies which are essential for operation of the site or necessary to carry out activities requested by the user.

Amongst the technical cookies, which do not require explicit consent for their use, the Italian Data Protection Authority (ref. Legislation **Simplified Arrangements to Provide Information and**

**Obtain Consent Regarding Cookies** of 8 May 2014, hereafter referred to as "Legislation") also includes:

- "analytics cookies" where they are used directly by the site controller to collect information, in an aggregate manner, on the number of users and on how they visit the site;
- browsing or session cookies (for authentication);
- functional cookies, which allow browsing by the user according to a series of selected criteria (for example, language, products selected for purchase) in order to improve the service provided.

On the other hand, prior consent by the user is required for the use of "profiling cookies", that is, those cookies aimed at creating profiles relative to the user and used in order to send advertising messages in line with preferences shown by the user whilst browsing.

## TYPE OF COOKIES USED BY THE SITE

Copan uses cookies in order to provide its customers with a browsing experience modelled as much as possible around his/her preferences. By using cookies Copan ensures that the same information does not need to be received or entered every time the site is visited. The cookies are also used in order to optimise the performance of the website: in fact, they make the final purchasing procedure and the rapid search for specific items and products inside the site easier. In order to protect the users' personal data against possible loss and any form of unlawful processing, Copan has implemented opportune technical and organisational measures. *First-party cookies*

First-party cookies are the cookies generated and used by the controller of the site on which the user is browsing. These cookies, both technical and performance, are limited: in the first case to the transmission of session identifiers (consisting of random numbers generated by the server) which allow a secure and efficient browsing of the website; in the second case they are used for statistical purposes for detecting unique users, content displayed or downloaded etc.; an example is Google Analytics. The data is stored anonymously and is used in an aggregate manner. In particular, in order to disable the Google Analytics cookies, it is possible to use a special additional component made available by Google. To install it click [here](#).

### *Third-party cookies*

Third-party cookies, such as, for example, those setups using the Facebook "Like" button, are cookies generated and used by parties other than the controller of the site on which the user is browsing, on the basis of agreements between the website owner and the relative third party. Some advertisers use these cookies to track the user's visits to sites on which they offer their services.

The browser can be modified to deactivate the cookies by using a very simple procedure. Warning: if these cookies are deactivated the username and the password will no longer be stored on the website login box.

## HOW TO MANAGE YOUR PREFERENCES FOR COOKIES USING THE BROWSER

The user can select which cookies to authorise using the procedure in the *Cookie settings* section, as well as authorise, block or delete (fully or partly) the cookies using the specific functions of the relative browser or by using specific software: however, **if all or some of the cookies are disabled it may no longer be possible to consult the Site or some services or certain functions of the Site may no longer be available or not operate correctly and/or the user may be forced to modify or enter manually some information or preferences every time the Site is visited.** In order to obtain further information on how to set the preferences on use of the cookies through the particular browser consult the relative instructions:

- **Internet Explorer:**  
<https://support.microsoft.com/it-it/help/17442/windows-internet-explorer-delete-manage-cookies>
- **Firefox:**  
<https://support.mozilla.org/it/kb/Attivare%2520e%2520disattivare%2520i%2520cookie>
- **Chrome:**  
<https://support.google.com/chrome/answer/95647?hl=it&topic=14666&ctx=topic>
- **Safari:** <https://support.apple.com/kb/index?page=search&fac=all&q=cookies%2520safari>

It should be noted that Google (<https://support.google.com/analytics/answer/6004245>) provides visitors, who do not want information relative to their browsing to be sent to Google Analytics, the possibility of installing an "opt-out browser add-on" which is available for more modern browsers (see <https://tools.google.com/dlpage/gaoptout>).