



Privacy Policy – website

Effective date – February 24th, 2021



We are providing this information not only to comply with legal data protection obligations established in Regulation (EU) 2016/679 or “Regulation”, but also because we believe that protecting personal data is a fundamental value of our company activities, and we want to provide you with all information you could need to protect your privacy and control the use made of your data when you navigate our website. According to article 13 of the GDPR, therefore, we inform you that:

1. **DATA CATEGORIES:** Plenisfer Investments Sgr S.p.A. will process your personal data such as:
 - Data collected automatically. The computer systems and the applications dedicated to the functioning of this website detect, during their normal functioning, some data (the transmission of which is implicit in the use of Internet communication protocols) potentially associated with identifiable users. The collected data includes the IP addresses and the domain names of the computers used by the users connecting to the site, the addresses in the Uniform Resource Identifier (URI) notation of the requested resources, the time of the request, the method used to submit the request to the server, the file size obtained in response, the numerical code indicating the status of the response given by the server and other parameters concerning the operating system, the browser and the IT environment used by the user. These data are processed, for the time strictly necessary, for the sole purpose of obtaining statistical information on the use of the site and to check its regular operation. The provision of such data is mandatory as it is directly connected to the web browsing experience.
 - Data provided voluntarily by the user. The voluntary and explicit sending of e-mails to the addresses indicated in the different access channels of this site does not imply a request for consent and the possible compilation of specifically prepared forms entail the subsequent acquisition of the address and data of the sender / user, necessary to respond to the requests produced and / or provide the requested service. The voluntary submission by you of e-mails to our e-mail addresses does not require further information or requests for consent. On the contrary, specific summary information can be reported or displayed on the pages of the site prepared for particular services on request (form). The user must therefore explicitly consent to the use of the data reported in these forms in order to send the request.
 - Cookies. The site does use technical / profiling cookies of third parties which may collect user browsing data, whose conferment is optional and takes place through the expression of a free and informed consent. Cookies work in order to analyze the effectiveness of the site and make it easier and more intuitive over time. The data collected through cookies are used to make the browsing experience more enjoyable and more efficient in the future, trying to assess the behavior of users and to change the offer of content according to their behavior. For more information, a special cookie policy is available.
2. **SOURCE OF PERSONAL DATA:** The personal data of which Plenisfer Investments Sgr S.p.A. is in possession are collected directly from the interested.
3. **DATA CONTROLLER:** The data controller is Plenisfer Investments Sgr S.p.A., which can be contacted by e-mail at privacy@plenisfer.com
4. **PURPOSE OF DATA PROCESSING AND LEGAL BASIS:** The data processing of your data has your consent as its legal basis and is carried out for the management of the following purposes:

- For the management of any user requests;
- For monitoring the correct functioning of the portal;

In addition, the data will be processed in anonymized and / or aggregated form to improve the web browsing experience and to monitor the proper functioning of the portal, as well as for its protection. Finally, your data will be processed for the fulfillment of obligations established by laws, regulations and / or community regulations, or ordered by the supervisory and control authorities; In this case, the legal basis of the processing is the fulfillment of the legal obligations to which the Data Controller is subject. This site processes your data in a lawful and correct manner, adopting the appropriate security measures aimed at preventing unauthorized access, disclosure, modification or unauthorized destruction of your data.

5. **RECIPIENTS OF DATA:** Within the limits relevant to the purposes of processing indicated, your data may be disclosed to partners, consulting companies, private companies, appointed by the Data Controller or for legal obligations or to fulfill your specific requests. The Data Processors and Data Processors are promptly identified in the Privacy Document, which is updated on a regular basis.
6. **TRANSFER OF DATA ABROAD:** The data collected are not subject to transfer abroad.
7. **STORAGE PERIOD:** The data collected will be kept for a period of time not exceeding the achievement of the purposes for which they are processed ("conservation limitation principle", art.5, GDPR) or according to the deadlines set by the regulations of law. The verification of the obsolescence of the data stored in relation to the purposes for which they were collected is carried out periodically.
8. **RIGHTS OF THE INTERESTED PARTICIPANT:** The interested party is always entitled to request the Data Controller to access your data, correct or cancel it, limit the processing or the possibility of objecting to the processing, requesting data portability, to revoke the consent to the processing by relying on these and other rights provided by the GDPR through a simple communication to the Owner.
9. **DATA PROCESSING METHODS:** The personal data you have provided will form the subject of processing operations in compliance with the aforementioned regulations and the confidentiality obligations to which the activity of the Data Controller is based. The data will be processed both with computer tools and on paper and on any other type of suitable support, in compliance with the appropriate security measures pursuant to Article 5 par. 1 lett. F of the GDPR.
10. The policy is not to be considered valid for other websites that may be consulted through links on the websites under the domain of the Owner, who is not to be considered in any way responsible for the websites of third parties.