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PRIVACY POLICY

Welcome to the website [International Food!](#)

International Food pays the utmost attention to confidentiality, protection and security of your personal data.

Please read our privacy policy carefully, which is applied in all cases when you access the website and decide to navigate its contents and use its services.

This document is also intended to be a policy document, in accordance to Articles 13-14 of EU Regulation 2016/679 (hereafter the "Regulation") and the applicable national legislation concerning the processing of personal data, Legislative Decree 196/2003 and subsequent amendments and additions, for all users who access **International Food**.

This policy is provided and only applies to this website (as indicated above), and not for other sites, which can be accessed by the user through links on the site. **International Food** is not responsible for these sites nor for the procedures they apply to respect data confidentiality, therefore, **International Food** would recommend to read the privacy policies of all parties you come into contact with, before disclosing any personal information.

DATA CONTROLLER

The Data Controller of the data collected through this website is **International Food Srl**, with registered office in Via Canonica 1009 - 47822 Santarcangelo di Romagna (RN) – Italy - VAT No : 04278510401 - Tel. 0541627276 – 0541627160 - Fax: 0541627273 – Email info@intfood.it (hereafter "**International Food**", or "Data Controller"): it decides autonomously on the purposes and methods of processing, as well as on the security procedures to be applied in order to guarantee the confidentiality, integrity and availability of data.

TYPES OF DATA PROCESSED AND PURPOSE OF PROCESSING

Data provided voluntarily by the user

The user is asked for personal data (i.e. name, last name, e-mail, etc.) only if he/she is interested in contacting or using the services provided on this website. In such cases, the user will be provided with appropriate policy information and, where necessary, will be asked to agree. The processing of the data provided will be done in accordance with the purposes and the modes indicated in this privacy policy and in the specific privacy notices provided from time to time.

CONTACTS – INFORMATION REQUEST

Data provided directly by the user by filling out and submitting contact forms.

The explicit and voluntary sending of messages to the contact addresses, as well as filling out and forwarding the forms on the website, entail the acquisition of the sender's contact data, as well as all the personal data included in communications.

Such data are processed for the following purposes and on the relevant legal basis for processing, for a storage period not exceeding that necessary for the purposes for which they were collected and processed.

Type of data processed: name, last name, e-mail, city, telephone and message.

Purpose of processing:

- Management of the request sent by the user;



- Provision of the requested service (i.e. price quotations, information, etc.);

Legal basis:

- Processing is necessary for fulfill requests; for the implementation of pre-contractual and contractual measures taken at the data subject's request;

NEWSLETTERS AND COMMERCIAL COMMUNICATIONS

Data provided directly by the user by filling out and submitting form for subscription to the Newsletter.

Subscription to the Newsletter on this site is optional, explicit and voluntary; this activity entails the acquisition of the sender's contact details.

Such data are processed for the following purpose and on the relevant legal basis for processing, for a storage period not exceeding that necessary for the purposes for which they were collected and processed.

Type of data processed: e-mail

Purpose of processing: sales and marketing activities such as:

- Sending Newsletters in case of subscription to the service;
- With the acquisition of consent, sending of commercial information also via email, to propose products, to conduct surveys on customer satisfaction, market research, promotional activities in general.

Legal basis: Consent of the user - Opt out: Possibility of revoking consent in each newsletter communication or by writing to the Data Controller.

Service Unsubscription

To stop receiving the Newsletter, simply click on the "Unsubscribe" / "Cancellation" button at the bottom of each Newsletter e-mail or send a message to the contact address info@intfood.it

A.2 FURTHER PROCESSING PURPOSES

Legitimate interests

- Contractual purposes, connected and instrumental to the establishment and management of customer relationship and/or service provision, such as the acquisition of information prior to the conclusion of a contract;
- Fulfilment of obligations laid down in State laws, regulations and EU legislation, or provisions issued by relevant authorities authorized by law, and by control or supervisory bodies (i.e. fiscal, accounting, administrative bodies etc.);
- The exercise of the Data Controller's rights in court and the management of any disputes.

Statistics

Collection of data and information in a purely aggregated and anonymous form, in order to verify the proper functioning of the site, finalized to a continuous improvement.

None of this information allows to identify the physical user of the site.

Data security

Collection of data and information in order to protect the security of the site and users (spam filters, firewalls, virus detection) and to prevent or detect fraud or abuse of the website.

The data, including domain names of the user's computers connecting to the site, URIs (Uniform Resource Identifier) of resources requested, timestamps of request, method used to submit the



request to the server, size of the file obtained in response, 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, are recorded automatically and may also include personal data (IP address) that could be used, in accordance with the laws in force, in order to block attempts to damage the site itself or to cause damage to other users, or any other harmful or criminal activities. Such data is never used to identify or profile the user and is periodically deleted.

Cookies

Cookies are small text strings that the sites visited by the user send to his terminal (usually the browser), where they are stored before being re-transmitted to the same sites at the next visit of the same user. While browsing a site, the user may also receive cookies on his terminal which are sent by different sites or web servers. (so-called "third parties"), on which certain elements (such as images, maps, sounds, specific links to pages of other domains) on the site being visited may reside. Cookies, which are usually present in a very high number in the user's browsers, and sometimes with characteristics of wide temporal persistence, are used for different purposes: computer authentication, sessions monitoring, storing information on specific configurations concerning users accessing the server, etc. For further details, see the website's *Cookie policy*.

MANDATORY OR OPTIONAL NATURE OF DATA PROVISION

Users are free to decide whether or not to provide their personal data through this website and/or the services connected to it. Failure to provide data, as indicated on a case-by-case basis in the information provided to the user, may cause the impossibility to provide the requested service. The mandatory nature of any information required is indicated on the website by the symbol (*).

Refusing to communicate certain data marked as mandatory makes it impossible to pursue the main purpose of the specific collection: such refusal could, for example, make it impossible for **International Food** to provide answers to the user, or the other services that may be available on the website.

Providing **International Food** of further data, other than those marked as essential, is optional and has no effect on the pursuit of the main purpose of the collection.

MODE AND PLACE OF PROCESSING

The processing of personal data will always be based on the principles of correctness, lawfulness, transparency and protection of confidentiality by means of technical and organizational security measures, in order to guarantee an adequate level of protection.

SHARING OF THE WEBSITE'S CONTENTS THROUGH SOCIAL MEDIA

Through **International Food's** website is it possible to share contents on Social Network. The user is free to decide whether and which content to share on one or more social networks (Facebook, Instagram, etc.). In this case, we inform you that no personal user data is acquired by **International Food** and the users are invited to check their social network account settings in order to identify any data acquired by external platforms. For further information, please consult the website of the social network to which the user is registered (www.facebook.com, www.instagram.com, etc.).

RECIPIENTS AND DATA TRANSFER

Personal data will be processed by the personnel in charge of developing and managing the website, who are authorized to process them in order to achieve the above mentioned purposes, and who have committed themselves to confidentiality or have been given an appropriate confidentiality legal obligation.



Personal data will be processed by subjects appointed as Processors, as they process data on behalf of the Data Controller (e.g. subjects with whom it is necessary to interact in order to provide the Services such as hosting providers, suppliers of e-mails or sms platforms, or subjects delegated to carry out technical maintenance activities including the maintenance of network equipment and electronics, etc.).

Personal data may be shared with third parties with whom the Data Controller has contractual relationships in place concerning services functional to the performance of the activity (such as, companies in charge of managing and fulfilling sales orders, carriers for the delivery of products, persons, companies or professional firms providing assistance and consultancy in administrative, legal, tax, financial and credit recovery matters relating to the provision of Services, etc.)

The data may be communicated, even without consent, to all the inspection bodies in charge of audits and controls, like the Agenzia delle Entrate, ministerial bodies and competent authorities, local authorities, Tax Commissions of any order and degree, at their express request, which will process them as autonomous data controllers for institutional purposes and/or under the law during investigations and controls.

Personal data are not intended for publication or dissemination.

The Data Controller will provide the full list of appointed external managers.

The data will be processed by the Data Controller in Italy and within the territory of the European Union and the European Economic Area. Should it be necessary, for technical, organizational and/or operational reasons, to make use of subjects (from those indicated in the above list) located outside the European Union or the European Economic Area, please note that **International Food** will ensure that the processing of data by these subjects takes place in compliance with the applicable legislation. Therefore, transfers will be carried out by means of appropriate protections, such as adequacy decisions, model Standard Contractual Clauses approved by the European Commission or other measures deemed appropriate. The interested party may request further information by sending an e-mail to the following address: info@intfood.it.

DATA RETENTION

The personal data processed for the purpose of providing the Services/Products and Contractual Obligations shall be kept by the Data Controller for the time strictly necessary to provide the requested service and to properly execute the contractual relationship with the user. In any event, since such personal data are processed to provide the Services and to allow the execution of the contractual relationship, the Data Controller may retain them for a longer period, in particular as may be necessary to protect the interests of the Data Controller from possible liability relating to the Products. At the end of this period, the data will be deleted.

The user's requests, and the data contained therein, will be kept only for the time necessary to allow the Data Controller to identify the correct fulfillment of the request, and in any case for as long as may be necessary to protect the Data Controller's interests from possible liability. At the end of this period, data which allow the identification, even indirectly, of a natural person (such as name, e-mail) will be made anonymous and kept, in the form of aggregated data, for statistical purposes.

Personal data processed for the purpose of legal obligations will be retained by the Data Controller for the period provided for by specific legal obligations or applicable legislation.

Any personal data processed for Marketing and Profiling purposes will be retained by the Data Controller until the consent given by the user is revoked. Once consent is revoked, the Data Controller will no longer use the personal data for such purposes, but may still retain it, in particular to the extent that may be necessary to protect the Data Controller's interests from possible liability based on such processing.



Unless otherwise specified, personal data will be processed for as long as you use this website and the services provided through it. If consent is revoked, the personal data will be retained by the Data Controller for the purpose of proving the fulfilment of its obligations until the prescription of the same has occurred.

RIGHTS OF THE DATA SUBJECTS

Articles 15 et seq. of the GDPR EU 2016/679, grant the data subjects specific rights.

In particular, the right to obtain confirmation of the existence or otherwise of personal data, access and rectification or erasure of personal data, or restriction of processing concerning them, or to object to the processing of data, as well as the right to data portability, communication of such data and the purposes on which the processing is based. In addition, data subjects have the right to obtain the revocation of consent at any time without prejudice to the lawfulness of processing based on consent given before the revocation, the transformation into anonymous form or the blocking of data processed in violation of the law, as well as the updating or, if there is an interest therein, the integration of data. The data subjects have the right to object, on legitimate grounds, to such processing.

The exercise of these rights is not subject to any time-related constraints, and may be carried out free of charge by contacting the Data Controller at the references given at the beginning of this information notice, by ordinary mail and/or e-mail.

Those who consider that the processing of their personal data carried out through this website is in violation of the provisions of the Regulation, have the right to complain to a supervisory authority (for Italy: the Guarantor for the Protection of Personal Data, www.garanteprivacy.it), in accordance to the art. 77 of the Regulation, or to take appropriate legal action (art. 79 of the Regulation).

CHANGES AND UPDATES TO THE PRIVACY POLICY

International Food reserves the right to modify or update the content of the site's Privacy Policy, in part or entirely, also due to changes in applicable legislation. Such changes will be binding as soon as published on the website. Therefore, the Data Controller invites the user to regularly visit this section in order to take cognizance of the most recent and updated version of the Privacy Policy, in order to be kept up-to-date on the personal data collected and on its use by the Data Controller.