

Privacy Policy and Cookie Policy of the website A-Tono

1. Introduction

In accordance with the commitment and care that the **A-Tono Group** dedicate to the protection of personal data, we inform you about the methods, purposes and scope of communication and dissemination of your personal data and your rights, in accordance with Article 13 of EU Regulation 679/2016 (hereinafter also "**GDPR**"). This information relates only to the **A-Tono** website accessible at the address <http://www.a-tono.com> (hereinafter also the "**Site**") and does not concern other websites that may be consulted by the user through the respective links.

2. Owner

A-Tono S.r.l. (hereinafter, also "**A-Tono**"), with registered office in Milan in C.so Buenos Aires 77, is the data controller of personal data (hereinafter also the "Data Controller ") collected on the Site pursuant to and for the purposes of the GDPR.

3. Categories of personal data processed by the Data Controller

Browsing the Site and the features on the Site may involve the processing of your personal data that **A-Tono** carries out as Data Controller.

This data may be provided implicitly by the tools you use to access and use the features of the Site or may be provided explicitly by you.

A-Tono may process the following categories of users' personal data:

- **technical navigation** data relating to the IP address, the identification codes of the devices used by the user for the use of the Site, the characteristics of the browser and the access times;
- **personal and contact information** provided intentionally by the user (e.g. name, surname, e-mail, telephone number, etc.).

4. Purposes and legal bases of the processing

Your personal data will be processed by **A-Tono** on the following legal grounds and for the following purposes:

a) Proper functioning of the Site

Navigation data are used to obtain anonymous statistical information on the use of the Site and to check that it is working properly. This data could also be used to ascertain responsibility in the event of potential cybercrime.

b) Interaction with A-Tono

Your personal data are processed for the fulfillment of your possible requests for information or contact transmitted through the Site or A-Tono's social network pages.

Providing your personal data for this purpose is optional, however, without it, we will not be able to provide you with the requested information and clarification.

c) Fulfilment of legal obligations

Your personal data are processed for the fulfillment of specific obligations provided for by laws, regulations, as well as deriving from provisions of judicial and administrative Authorities and of supervisory and control bodies.

For the achievement of these purposes, your specific consent is not required as performances related to legal obligations.

5. Methods of data processing

The processing of your personal data will be mainly carried out with the aid of electronic or, in any case, automated tools, with suitable means to guarantee the security and confidentiality of the data, in accordance with the provisions of the GDPR and within the limits necessary to pursue the purposes indicated in art. 4 above.

A-Tono will adopt all the technical, IT, organizational, logistical and procedural security measures, so that the adequate level of data security required provided by art. 32 of the GDPR is guaranteed, allowing access only to the persons in charge of processing by the Data Controller or by any Data Processors designated by the same.

6. Dissemination, communication and subjects who access your personal data

Your personal data will not be disclosed, but may be communicated where necessary for the purposes set forth in Article 4 of this privacy policy to:

- third parties who carry out part of the activities of treatment and / or activities connected and instrumental to the services provided by the Data Controller through the Site, such as, but not limited to, professional and consulting companies, accounting service providers, customer service companies, IT service providers, and A-Tono Group companies;
- individuals, employees and / or collaborators of the Data Controller, who have been entrusted with specific and / or more treatment activities on your personal data: these individuals have been given specific instructions on safety and correct use of personal data;
- where required by law or to prevent or suppress the commission of a crime, your personal data may be communicated to public bodies, to the judicial authority, to the administrative authority as well as law enforcement bodies.

A detailed and up-to-date list of those who process your data as data processors is available to you upon request.

7. Transfer of your personal data outside the European Economic Area

Your personal data will be processed by **A-Tono** within the European Economic Area (EEA).

If, for technical and/or operational reasons, it is necessary to use subjects located outside the EEA, or it is necessary to transfer some of the data collected to technical systems and services managed in *the cloud* and located outside the EEA, the processing will be regulated in accordance with the provisions of Chapter V of the GDPR. All the provisions contained therein shall be applied in order to ensure that the level of protection of data subjects is not adversely affected and remains, therefore, adequate. In the absence of a decision, regarding the transfer, by the Commission, specific means of protection will have to be provided to the data subject (see, GDPR, Chapter V, Art. 46, paras. 2-3).

8. Duration of Processing and Storage of your Personal Data

A-Tono in accordance with Article 5.1 e) of the GDPR will store your personal data for a period not exceeding the achievement of the purpose for which they were processed:

- interaction with **A-Tono**: for the time necessary to process your request.

Notwithstanding the Data Controller has the legitimate interest to store your personal data for a further period if this is strictly necessary for the protection of your and the Controller's rights, to comply with legal obligations or to comply with orders of the judicial, administrative, supervisory authorities.

9. Rights of the interested party

A-Tono guarantees you to be able to exercise at any time the rights provided for in Article 12 et seq. of the GDPR. You have the right:

- to know if the Data Controller holds and / or processes personal data relating to your person and to access it in full also by obtaining a copy (art. 15 **Right to access**),
- the rectification of inaccurate personal data or the integration of incomplete personal data (Art. 16 **Right to rectification**);
- the cancellation of personal data held by the Data Controller if one of the reasons provided for by the GDPR exists (**Right to Cancellation**, 17);
- to ask the Data Controller to limit the processing only to some personal data, if there is one of the reasons provided for by the Regulation (Art. 18 **Right to limitation of processing**);
- to request and receive all your personal data processed by the owner, in a structured format, commonly used and readable by automatic device or request transmission to another holder without hindrance (Art. 20, **Right to Portability**);
- to object, for legitimate reasons, to the processing of data even if only in relation to certain purposes or ways (art. 21 **Right to object**);
- to lodge a complaint with the competent Data Processing Authority if you believe that the processing of your personal data conducted by the Data Controller is in violation of the GDPR or / or applicable legislation.

To exercise all your rights as identified above, simply contact the Data Controller by sending an e-mail to the e-mail box privacy@a-tono.com.

COOKIE POLICY

A-Tono S.r.l. (hereinafter also "**A-Tono**"), the owner of the website accessible at the address that can be reached at <http://www.a-tono.com> (hereinafter also the "**Site**"), uses cookies and other tracking and analysis tools, in order to ensure the proper functioning of the Site, to make improvements that make it easier to navigate and in order to send you personalized commercial communications.

Cookies are small aggregates of text recorded locally in the temporary memory of your browser, and therefore in your hardware, which can have different functions (technical, analytical, profiling) and duration (limited to the user's visit, fixed deadlines) and can be installed by the website owner or third parties.

1. Type of cookies and purpose

This Site can make use of three different types of cookies:

Essential technical cookies

These cookies are necessary for the proper functioning of the Site. They allow the navigation of the pages, the sharing of our content, the storage of access credentials to make it faster to enter the site and to keep preferences and credentials active while browsing (for example to keep track of the selected language). Without these cookies we could not provide the services for which users access the Site.

This category includes cookies that are essential for the operation of the Site, such as technical cookies for access to the Site or for communication between the parties and the services that compose it.

Technical cookies for statistics and performance analysis

These cookies allow us to know how visitors use the Site, to be able to evaluate and improve its functioning and favor the production of content that best meets the information needs of our users. For example, they allow you to know which pages are the most and least frequented. They consider, among other things, the number of visitors, the time spent on the Site by the average user and how they arrive. In this way, we can know what works well and what to improve, as well as make sure that the pages load quickly and are displayed correctly. All information collected by these cookies is anonymous and not linked to the user's personal data. To perform these functions on our sites we also use third-party services that anonymize the data making it not attributable to individuals (*so-called "single-in"*). Where there are services that are not completely anonymized, you will find them listed among the third-party cookies and they will only be used subject to your consent.

Functional and profiling cookies

This category includes cookies that allow the creation of profiles related to the user and that are used in order to send advertising messages in line with the preferences expressed by the user while browsing the web. The use of such cookies is subject to your consent.

Cookies belonging to this category may be owned by A-Tono, A-Tono's partners and third parties.

Cookies from our partners allow us to offer advanced features, as well as more information and personal functions. This includes the ability to share content through social networks, to access video-streaming services and CDN networks on which we host our content. These services are mainly provided by external operators engaged or knowingly integrated by **A-Tono**. If you have an account or if you use the services of such parties on other sites web, they may be able to know that you have visited our Site.

User interactions with third-party cookies, as tracked in the cookie preference management banner on the Site, are governed by the third parties' policies, and, therefore, for more information, please visit the third parties' websites.

2. Managing Cookies

At any time, the user can manage consent relating to individual categories of cookies, with the exception of those strictly necessary for the operation of the Site, in the dedicated area reachable from the banner and present at the bottom of the Site or by selecting, on the browser, the settings that allow to block or remove them as well as through <http://www.youronlinechoices.eu/it/>.

By accessing the area dedicated to cookie management on the Site, it is possible to know the duration of the cookies used on the Site.

Since each browser - and often different versions of the same browser - also differ significantly from each other if it prefers to act independently through the preferences of your browser can find detailed information on the necessary procedure in the guide of your browser. For an overview of the modes of action for the most common browsers, you can visit the address:

http://www.cookiepedia.co.uk/index.php?title=How_to_Manage_Cookies

3. Rights of the data subject

You can exercise your rights under Art. 12 et seq. of the GDPR at any time.

Any request for information or clarification or exercise of rights can be addressed to the Data Controller by sending an e-mail to: privacy@a-tono.com

In addition, you always have the right to lodge a complaint with the Guarantor Authority for the Protection of Personal Data, which can be contacted at garante@gpdp.it or through the <http://www.gpdp.it> website.