



Information on data processing and cookie policy

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The company IMPact SGR S.p.a.- company IMPact SGR S.p.A.- Asset Management Companies (below "IMPact SGR") knows that personal data protection of natural persons is a fundamental right. Personal data of users of the Site <https://impactsgr.it> (below, 'The Site') will be processed in compliance with the General Data Protection Regulation (UE) 2016/679 of 27 april 2016 and in compliance with the Lgs. D. 30 june 2003, n. 196 and subsequent amendments.

With this document are highlighted the purposes of the data processing, technical and organisational measures that guarantee a lawfulness data processing.

1. PLACE OF DATA PROCESSING

The Site is located on physical machines managed by a company incorporated under italian law, located in Italy and subjected to the legislation mentioned above. IMPact SGR verifies and controls periodically and receives a report about hardware configuration on which the software of the Site is installed.

2. TYPES OF DATA PROCESSED

Through the Site, IMPact SGR collects and process personal data (name, surname, e-mail address, telephone number) directly and voluntary given by the user through the form available on the Site. No data is subject to diffusion.

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2.1. Browsing data

Computer systems and software procedures for the collect browsing data about users of the website whose transmission is implicit in the use of internet communication protocols. we refer to those informations that are not associated to specific users, but for their nature, they could, through processing and associations with other data, allow users to be identified.

In this category there are IP address or domain names of the users, URL address, the hour of the request, the method used to request to the server, the dimension of the file, the number code that indicates the request status of the server response (success, error etc.) and other parameters related to the operating system and to the computer environment of the user.

Browsing data are process to:

- guarantee the correct functioning of the Site;
- collect anonymous statistical informations about the use of the Site;
- establish the liability in cyber crimes situations; in other way, browsing data are stored for a period of 7 days.

Specific security measures are observed in order to avoid data loss, illicit or incorrect use and unauthorized access.

2.2 Cookies

Cookies are text files with small pieces of data that are downloaded on the computer when a user visits a Site. To every visit cookies are sent to the Site that generated them (first-party cookies) or to a Site that recognizes them (third-party cookies). Cookies are useful because allow a Site to recognize the user's device. They have different purposes such as allow to surf through pages, remember favorite sites and improve the browsing experience. They guarantee that advertising content are user-centred. There could be technical cookies and profiling cookies (first o third party).

Below, main informations about cookies categories:

1. Technical cookies

Technical cookies are those which don't require the consent of the user. Among them, there are essentials cookies that are "strictly necessary" that enable functions without which it could not be possible to use the full Site. Technical cookies are used by IMPact SGR and are saved on the user's computer only for the time necessary. These cookies

facilitate the transition from http to https when the page is switched in order to guarantee data protection. Technical cookies do not require user's consent because they are necessary to provide the service.

Technical cookies			
Name	Function	Type	Expiry
CookieConsent	It stores the status of the consent to cookies for the current domain.	HTTP	1 year
rc::a	This cookie can distinguish human from robot. This is useful for the Site in order to make valid reports on the use of the Site.	HTML	Persistent
rc::c	This cookie can distinguish human from robot.	HTML	Session
__cf_bm	This cookie can distinguish human from robot. This is useful for the Site in order to make valid reports on the use of the Site.	HTTP	1 day

2. Third-party cookies

When browsing the IMPact SGR site, you may also receive on your device cookies from different sites or web servers (so-called “third-party cookies”): this occurs because the Site may contain elements such as, for example, images, maps, sounds, specific links to webpages on other domains that are stored on servers other than those on which the requested page is stored. In other words, these cookies are set directly by the managers of websites or servers other than this Site. The name of these cookies, their intended purpose and their duration are defined by the third party; as such, it is necessary to consult the documentation provided by that party in order to obtain more information on them.

Our site uses third-party cookies managed by providers of third-party services (e.g. Google Analytics). IMPact SGR does not monitor third-party cookies and as such for more information on them you should consult the cookie policies of the third parties in question. Google’s cookie policy can be found at this link:

The cookies installed on your browser can be deleted at any time. Below you will find the links to the cookie-management guides of the main browsers:

- [Firefox](#)
- [Chrome](#)
- [Chrome Mobile](#)
- [Internet Explorer](#)
- [Microsoft Edge](#)
- [Opera](#)
- [Safari](#)
- [Safari Mobile](#)

The user can also monitor and/or cancel cookies via the following links:

aboutcookies.org;

www.youronlinechoices.com;

www.networkadvertising.org/choices/

You can delete all of the cookies on your computer and set most browsers to prevent cookies being accepted. In this case, however, it may be necessary to set certain preferences manually every time you visit a site, and certain services and functions may not work properly.

3. RIGHTS OF THE DATA SUBJECTS

For the storage time of the personal details of the data subjects as set out in the preceding paragraphs 2.1 and 2.2, you, as the data subject, may exercise your rights to access the

data, in order to obtain confirmation of whether or not your personal details are being processed and to be informed as to the content and source of said details. You are also entitled to correct, cancel, limit and oppose the processing operations. The user has also the right to request the erasure, the anonymous update or the block of data in case of law infringement, and it has the right to oppose to their treatment for legitimate reasons.

4. PURPOSES OF THE PROCESSING OPERATIONS

Your personal information may be processed in order to fulfil your requests for information and material, and to put you in contact with the company's departments.

5. REQUIREMENT TO SUPPLY DETAILS

Your personal details will be collected and stored by means of a specific form on this site when it is essential to do so in order to fulfil the purposes set out in this policy. The supplying of your details is necessary when you wish to get in contact with the company, so that it then becomes possible to re-contact you to provide you with any information you have requested.

You will, however, still be able to browse the site without having to register or identify yourself.

6. METHODS OF DATA PROCESSING

Your personal information will be processed using automated and paper-based methods, and strictly to the extent and for the period of time required for the specific purposes for which the information was originally collected.

The IMPact SGR website is protected by security measures that are adequate to guarantee the integrity, confidentiality and availability of your personal information.

Despite our best efforts, we cannot guarantee fully that the measures implemented to ensure the security of the site, the transmission of your details and the information itself are capable of eliminating entirely any potential risk of unauthorised access or loss of data.

7. DATA TRANSFER

Referring to cookies on the Site, your personal data, after you explicit consent, could be transferred, limited to the purposes mentioned above, to extra EU States. So, your data could be transferred to States where there is an adequate data protection decided by the European Commission pursuant to Art. 45 of GDPR or when are provided appropriate safeguards as long as data subject have enforceable rights and effective legal remedies

pursuant to Art. 46 of GDPR, or when there is one of the conditions laid down in Art. 49 of GDPR.

8. CONTACT DETAILS

Any request relating to the processing of the personal details referred to in this statement may be submitted to the following email address: privacy@impactsgr.it

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