

## PRIVACY POLICY

### REGULATORY FRAMEWORK

- Directive 2002/58/EC – on “personal data processing and protection of private life in the field of electronic communications”.
- Regulation (EU) 2016/679 of the European Parliament and of the Council 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, and repealing Directive 95/46/EC (“General Data Protection Regulation”).

### DATA CONTROLLER AND DATA PROTECTION OFFICER

While consulting this web site, data on identified or identifiable people can be processed. The Data Controller is Vitalab s.r.l., which is based in via B. Brin, 69, 80142 Napoli (NA), Italy, e-mail: info@vitalabactive.com.

### DATA PROCESSING PLACE AND STORAGE TIME

The treatments related to the web services of this website take place at the service provider appropriately appointed as Data Processor ex art. 28 of Regulation (EU) 2016/679 and are only handled by technical staff authorized of occasional maintenance operations. The data collected will be stored - for each type of data processed - exclusively for the time necessary to fulfill the specific purposes indicated in the specific summary information displayed on the website pages and prepared for particular services.

### TYPE OF DATA PROCESSED

#### Surfing data

The information systems and the software procedures necessary for the functioning of this web site acquire, during their normal exercise, some personal data whose transfer is implicit in the employment of communication protocols on the Internet. This information is not gathered to be associated to identified Data Subjects, but – due to its nature – it could allow the users to be identified. To this category belong the IP addresses and the domain names of the PCs used by the users that connect to the web site, the URI (Uniform Resource Identifier) notation addresses of the resources requested, the time of the request, the method used to submit the request to the server, the dimension of the file obtained, the numeric code indicating the status of the answer given by the server (successful, error, uest, the metho etc.) and other parameters concerning the operation system and the user’s information environment. These data are used only to obtain anonymous statistic information on the employment of the web site and to control it works correctly and are cancelled immediately after the processing. The data, besides, could be used to assess the responsibility in case of possible cyber-crimes against the web site.

#### Data provided freely by the user

The optional, explicit and voluntary forwarding of personal data from the user on registration forms present on this website implies the subsequent acquisition of such data provided by the sender, which is essential to the procession of the required service. Specific, concise information to dat subjects will progressively be reported or displayed on the pages of the website set up for particular services on demand.

### COOKIES

Cookies are small text files that are deposited on the user’s personal computer by the web sites he/she visits. Their main task is allowing the web site to work and operate in a more efficient way, as well as providing information to the web site owners.

Here is a list of the cookies stored by our web site.

- 1- **Technical cookies**, to the extent strictly necessary to use and visit the web site. In particular, the use of session technical cookies is limited to the transmission of sessions identifiers (made by random numbers generated by the server) needed to allow the safe and efficient surfing of the web site. Such cookies avoid having recourse to other information techniques potentially prejudicial for the secrecy of the users’ surfing and they don’t allow the acquisition of personal data that could identify the user. Users’ personal data aren’t acquired by the web site for this purpose. No cookie is used to transmit information of personal nature, nor is any type of so-called persistent cookie used, i.e. user-tracking systems. In case the user doesn’t wish to receive any kind of cookie in his/her personal computer, either from this web site or from other ones, he/she can elevate the data protection level of his/her browser thanks to the special function.

Here is a detailed list:

NAME OF THE COOKIE	DEFAULT EXPIRATION	DESCRIPTION OF THE COOKIE
JSESSIONID	Session	To identify the session's name

- 2- **Google Analytics Cookies**, used to gather and anonymously analyse the information concerning the behaviours while using the web sites (for example the time and day of the visit, possible previous visits to the web site by the same user, the origin site, etc.). Such information (including the user's IP address) is gathered by Google Analytics, that processes it in order to make a report for Vitalab s.r.l., concerning the activities on its web site and used by it in order to improve the web site. Google doesn't connect the IP address to any other datum it owns, nor tries to connect an IP address with the user's identity. Google can also communicate this information to third parties, in case it's provided by the law or in case these third parties process the information on behalf of Google.

A more detailed explanation can be read below.

NOME COOKIE	SCADENZA PREDEFINITA	TIPO	DESCRIZIONE COOKIE
<b>__utma</b>	The default expiration is set after 2 years	<b>Third-party</b>	Used by Google Analytics. Each unique browser that visits a page of the site has a unique ID through the cookie. The <b>__utma</b> cookie contains the data of the last visit, the previous one and the first recorded one. This information is sent to Google's servers every time you open a page with the tracking code, and are used to calculate, among other things, the visitor's recency and the time since the last visit.
<b>__utmb</b>	Expires when the browser session is closed	<b>Third-party</b>	It is a Google Analytics cookie used to determine new sessions / visits. Contains the timestamp of the moment you entered the site. It is updated whenever data is sent to Google Analytics.
<b>__utmc</b>	Expires when the browser session is closed	<b>Third-party</b>	Google Analytics uses this cookie to establish a session. Through these two cookies ( <b>__utmb</b> , <b>__utmc</b> ) Google Analytics is able to calculate, for example, the average time spent on the pages.
<b>__utmt</b>	The default expiration is every 10 minutes	<b>Third-party</b>	It is a Google Analytics cookie used to limit the collection of data on the site in case of high traffic.

<b>__utmz</b>	The default expiry date is set after 6 months	<b>Third-party</b>	It is a Google Analytics cookie that stores the traffic source, indicates how the user has reached the site (search engine and which keywords, links, bookmarks, etc.).
<b>JSESSIONID</b>	Session	<b>Third-party</b>	Technical cookies used to monitor the status and performance of the site

For further information on the methods to gather and employ the data by Google, please visit the web site: [www.google.it/policies/privacy/partners/](http://www.google.it/policies/privacy/partners/) (or another URL that Google may provide from time to time).

## COOKIES PROCESSING

Here are the methods you can use to disable the cookies.

### 1- Technical cookies

Vitalab s.r.l., reminds that the total or partial disabling of the so-called technical cookies can compromise the web site functions. Anyway, users can decide whether to accept the cookies or not, by modifying the safety settings of their browser.

- Chrome: <https://support.google.com/chrome/answer/95647?hl=it>
- Firefox: <https://support.mozilla.org/it/kb/Gestione%20dei%20cookie>
- Internet Explorer: <http://windows.microsoft.com/it-it/windows7/how-to-manage-cookies-in-internet-explorer-9>
- Opera: <http://help.opera.com/Windows/10.00/it/cookies.html>
- Safari: [http://support.apple.com/kb/HT1677?viewlocale=it\\_IT](http://support.apple.com/kb/HT1677?viewlocale=it_IT)

### 2- Google Analytics Cookies

Vitalab s.r.l., reminds that Google Analytics' action can be selectively disabled by installing on the browser the opt-out component provided by Google. To disable Google Analytics' action, please follow the link: <https://tools.google.com/dlpage/gaoptout>.

## LINKS TO OTHER WEBSITES

This website may contain links or references for access to other websites, such as social networks Facebook, Instagram, Google+, Twitter and Pinterest. By clicking on the appropriate links you can, for example, share our contents. We inform you that the Data Controller does not control cookies or other monitoring technologies of these websites to which this Policy does not apply.

## DISCRETIONARY NATURE OF THE DATA PROVIDING

Apart from what has been specified concerning the surfing data, users are free to provide their personal data or not. However, the non-providing can entail the impossibility of obtaining what they asked.

## PROCESSING METHODS AND STORAGE PERIOD

Personal data are processed, even through the use of automated tools, for the time strictly necessary to achieve the purposes for which they were collected.

Personal data are processed also with automated tools, for the time strictly necessary to achieve the purposes for which they have been gathered. Specific safety measures are observed in order to prevent the loss of data, the illegal or wrong use of them and any unauthorized access. Vitalab s.r.l., took all minimum security measures provided by the law and inspiring to the main international standards it took further

security measures in order to minimize the risks concerning secrecy, availability and integrity of the personal data gathered and processed.

### **SHARING, COMMUNICATION AND SPREADAING OF DATA**

The data we collect may be transferred or communicated to other related to Vitalab s.r.l., for activities closely connected and instrumental to the efficiency of the service, such as the management of the data processing system, or for processing made by the other companies for the same purposes. Apart from said cases, data will not be disclosed nor given to anybody unless this is in compliance with contractual and legal obligations or users have given their consent. Therefore, personal information may be transmitted to third parties solely and exclusively if:

- there is an explicit consent to share data with third parties;
- there is the need to share the information in order to process users' requirements;
- this is essential to execute requests from Judicial Authorities or from the Police.

No data whatsoever coming from the Web is ever disclosed or circulated.

### **RIGHTS OF THE INTERESTED PARTIES**

Regarding the processing of the aforementioned data, pursuant to 15 et seq of the EU Regulation 2016/679, We remind you the right to obtain the access of Personal Data concerning you; the right to obtain the rectification (correction of inaccurate data or integration), the right to erasure the Personal Data processed unlawfully or in case one of the reasons specified in Article 17 of the EU Regulation exists. Furthermore, you have the right to lodge a complaint with a supervisory authority in case you consider that the rights indicated above have not been recognized.

### **MODIFICATIONS TO THIS PRIVACY POLICY**

Data Controllor verifies its personal data protection and security policy at regular intervals and revises it if needed according to regulatory or organizational changes or to the ones derived from the technological evolution. If the policy should be changed, the new version will be published in this page of the web site.

### **QUESTIONS, CLAIMS, SUGGESTIONS AND EXERCISE OF THE RIGHTS**

All those who are interested in obtaining more information, providing suggestions or sending claims or objections concerning the personal data protection policy or the way our Company processes the personal data, as well as to assert the rights foreseen by the legislation concerning the protection of personal data, can make it in writing to Data Controller Vitalab s.r.l., which is based in via B. Brin, 69, 80142 Napoli (NA), Italy, or send an email to: [info@vitalabactive.com](mailto:info@vitalabactive.com).