

Privacy Policy for users & Cookie Policy

(“Informativa”)

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1. 1. Why are we asking you to read this document?

Because we want transparency about how we process your personal data (“Data”) and also because it is provided for by the following European and national laws:

- EU Regulation n.679 of 2016 (“**GDPR**”)
- Legislative Decree n.196 of 2003 (“**Privacy Code**”)
- Legislative Decree n.101 of 2018.

We reserve the right to amend and/or update the Privacy Policy whenever we are required to do so by any additions and amendments to the European and national regulations set out above or because of changes in the types of processing or services offered. The new versions of the Privacy Policy will replace the previous ones and will be valid, effective, and applied from the date of publication on the portal or from the date of communication to the interested parties.

2. What does it mean that ANSA is the "Controller" of your personal data?

In short, it means that ANSA decides “**how**” and “**why**” to process your Data when you use the www.ansa.it portal or social channels related to it (“Portal”).

ANSA is in no way responsible (and therefore not a Controller) of the processing of personal data deriving from third-party websites that may be reached from the Portal, or from which the Portal may be reached by means of external links.

3. How to get in touch

If you wish to get in touch with ANSA to request information regarding the processing of your Data, please write to one of the following addresses,

- **Registered office** of the Agency, Agenzia ANSA Società Cooperativa – privacy – Via della Dataria 94, Roma (RM - 00187);
- **Certified company email:** agenzia.ansa@pec.ansa.it;
- Certified email of the **Data Protection Officer**, Avv. Daniela Cavallaro: rpd@pec.ansa.it.

Please read on to find out which information you may request and which privacy rights you may exercise.

4. A brief explanation about how to use the Portal

First, a necessary warning: the use of the Portal is intended for those who are of age (18 years old or older), therefore, from any device you connect (PC, Smartphone, or Tablet), you are also responsible for the use that a minor may make of the device and the Portal itself.

If you wish to access, register, or subscribe to the Portal, first please carefully read the General Terms and Conditions of Service that govern its use.

In short, you can use the Portal and access its contents in different ways:

- a. Guest user** – i.e., no need to register. In this case you can use the Portal's home page, the various channels, and single sections. However, you can only access 20 ANSA articles over 30 consecutive days from the first consulted article. Once the 20 articles have been used up you have three choices:
 - i. Wait for the 30 days to end so as to start a new 30-day run with another 20 articles;
 - ii. Register on the Portal completing the form that will show once the 20 articles are used up, with some advantages as a registered user that we will explain below;
 - iii. Subscribe, after having registered on the Portal, buying one of the subscriptions offers you published on the Portal.
- b. Registered user** – you have a personal account and a User profile on the Portal. When you register, whether or not you wish to enter into a subscription contract (as explained below), ANSA gives you the possibility of subscribing to one of its subscription offers (for a fee) to access services beyond those provided to guest users and to subscribe to newsletters or other services (depending on which services are available at the time).
- c. Subscribed user** – this is basically a registered user who has underwritten a subscription contract with ANSA for a specific offer of paid services (for instance: free access to the Portal without the 20 articles in 30 days limitation; newsletter for subscribed users only or other). The offer of services you subscribe to may suffer

variations according to the General Terms and Conditions of Service, which we suggest you read for further details.

ANSA can at any time propose a change in the offer or service (for example, going from a free service to a paid one), but you will always have the choice of subscribing, changing or withdrawing.

5. A brief explanation of what Data we process and why

From the moment when you connect to the Portal with your device, here at ANSA we process different types of Data concerning you. The purpose of this paragraph is to illustrate as simply as possible **which** data we process and **why** (also known as “**legal basis**” for processing).

A list seems like the best way to explain:

a. Data regarding navigation and cookies – the device you use to connect to the Portal has an i.d. number (the IP address) which, due to internet’s logic, is communicated to and registered by ANSA. Thanks to other IT instruments for tracing and purpose (“Cookies”), at ANSA we can also have other information on how you use the Portal (for example: time of access, clicked content, visited pages, page permanence, preferences, steps taken on the Portal, etc.).

Sometimes we process navigation Data and Cookies to enable you to access Portal use, while in other cases we elaborate said Data for a better understanding of how you use the Portal and make statistical studies – also comparing them with the behaviour from other users – with the intent of improving the Portal and customizing services offered. **Legal basis:** performance of the contract (article 6.1.b. GDPR); consent (article 6.1.a. GDPR).

If you wish to know more about navigation Data and Cookies, please read the Cookie Policy, which explains in detail which Cookies we use and how you can enable (or disable) them giving (or removing) your consent.

b. Registration Data – if you decide to register we ask you to input some Data on the registration form to be able to create an account and a user-profile associated to said Data. More specifically you have to enter: name and surname, province, email address and password to login to your personal account and to the user-profile. This Data is necessary to allow you to access your personal account and to modify your user-profile, as well as to access services and further contents provided by ANSA at the time of registration. **Legal basis:** performance of the contract (article 6.1.b. GDPR).

c. Major interest sections and news –if you register, this means that you have requested a service from us (free or paid, as the case may be), and therefore a contract is entered into between you and ANSA (for more details see our General Terms and Conditions of Service). In order to comply with the contract and provide you with the service you have registered for, we need to know which news items are of greatest interest to you (e.g., news, sport, politics, health...). This is why, when you complete the registration form, in addition to the Data to create your account, we ask you to enter your preferences regarding the sections of the Portal. **Legal basis:**

performance of the contract (article 6.1.b. GDPR).

d. User profile Data –once you have created your personal account, you can access your user profile freely, choosing yourself whether to enrich it with additional information and Data, if any, in addition to those we requested in the previous points (for example, you may decide to provide us with your date of birth, educational qualification, profession, gender, residence or domicile, your telephone number). We may use this Data, either one at a time or in combination with other Data you have provided to us, only for the following purposes:

i. *newsletter* – if you decide to receive our newsletter, we will send you a periodic e-mail containing ANSA news in line with your preferences. You may revoke your consent or object to receiving the newsletter at any time. **Legal basis:** consent (Article 6.1.a. GDPR); ANSA's legitimate interest (Article 6.1.f.) only when the newsletter is sent after the purchase of similar services (so-called soft spam), regarding which, however, you can always exercise your right to object, as specified below;

ii. *profiling* – if you authorise us, with your express consent we can:

- use the Data and information we have pointed out in the above points to combine them with other information and Data concerning your user profile:
- collect (also by means of Cookies) information relating to the way you use the Portal, your browsing experience, your preferences, and consumer habits;
- analyse this information in order to understand/forecast which offers may be best suited to you or to the group of users to which you belong (in technical terms this is called "Profiling"). Profiling follows statistical and probabilistic methods of Data analysis and is carried out with the technical support of an external service provider appointed as a data controller in accordance with Article 28 GDPR. **Legal basis:** consent (Article 6.1.a. GDPR)

iii. *commercial communication by ANSA* - always with your consent, we may send you: promotional and advertising material (printed and digital), discounts and offers for products and services, invitations to events directly organised by ANSA. Such a commercial communication activity may be based on profiling. **Legal basis:** consent (Article 6.1.a. GDPR); legitimate interest (Article 6.1.f.) only in cases where the commercial communication is made on the basis of previously purchased similar services (so-called soft spam).

iv. *commercial communication by other parties* - with your authorisation we may communicate your Contact Data and certain information relating to your User Profile and Profiling to parties other than ANSA who will send you commercial communications (by way of example, the sectors to which such parties belong may be as follows: social platforms, financial, insurance, automotive, humanitarian and charitable services, telecommunications). **Legal basis:** consent (Article 6.1.a. GDPR);

v. **customer care** – we can assist you, should you request it, by offering you support in all activities concerning use of the Portal, your account, and your user profile (e.g., for registration and subscription, managing your user profile, navigating the Portal, cancellation, etc.), as well as providing you with all information relating to our products and services. In order to provide you with the best possible customer care experience, we avail ourselves of a specialist supplier. **Legal basis:** performance of the contract and pre-contractual measures (Article 6.1.b. GDPR).

e. **Payment and invoicing Data** – in case of a subscription or, at any rate, in case in which the offer or service you requested entails the payment of a fee, we process and keep:

- Data relating to the payment method and type of payment you chose (e.g., IBAN and number of payment cards, automatic renewal by direct debit), which you can always modify by accessing your user profile, and
- Invoicing data to meet our administrative, tax, accounting, and contractual obligations.

In order to pursue these purposes, this Data may/must be communicated to subjects outside our organisation, such as: public Bodies (Inland Revenue), online payment intermediaries (PayPal©, Braintree©, etc.) tax and accounting consultants, accountants, lawyers. **Legal basis:** performance of the contract (Article 6.1.b. GDPR); fulfilment of legal obligations (Article 6.1.c. GDPR).

f. **Data relating to opinion surveys, customer satisfaction questionnaires and market research** - we may use your Contact Data - which you provided us during registration - to send you opinion surveys, customer satisfaction questionnaires and market research, in order to better understand how you perceive/rate our products and, consequently, to improve our offer. You are under no obligation to participate, so we will only process your Data if you decide to give your consent by participating in the specific project, concerning which, if needed, we may send you a specific notice. For certain projects your Data may also be processed by our partners/suppliers of customer satisfaction services. **Legal basis:** ANSA's legitimate interest (article 6.1.f.) for sending invitations to participate in surveys, questionnaires, and research, against which you may, however, always exercise your right to object, as specified below; consent (article 6.1.a. GDPR) for processing resulting from participation (including processing by external partners and suppliers).

6. Who has access to your Data and to whom may it be disclosed?

At ANSA each employee/collaborator has received specific authorisations and instructions on how and within which limits to process your Data, and is committed to the utmost confidentiality, security in processing and compliance with the instructions given, especially when your Data is processed by IT tools.

Not all ANSA staff have access to your Data. Processing, by reason of their respective purposes and competences, is carried out by those working in the following departments: Customers/Tenders/Sales Areas; IT Desk Service, Systems, and Infrastructure.

Your Data may be communicated and shared with external subjects (persons, companies, public Bodies and Authorities), among which, merely as an example:

- website and webpage development and implementation services providers;
- e-mail service providers;
- hosting and cloud service providers;
- providers of technology services and platforms (CRM, marketing, advertising);
- providers of user behavioural analysis and profiling software platform;
- social platform operators;
- banks and online payment intermediaries;
- consultants and professionals (e.g., lawyers, accountants and labour, tax, and accounting consultants)
- insurance companies;
- public Bodies and authorities;

In some cases, the listed entities act completely independently, so they will themselves be data controllers of your Data (for example, in case of public Bodies to whom we disclose your Data to fulfil tax obligations).

At other times, however, the listed entities act and process your Data on our behalf and within the limits of the service contract or agreements in place with us and are specifically appointed as data controllers in accordance with Article 28 GDPR. We can provide the list of data controllers contracted by ANSA upon request.

As to the managers of social platforms, let us point out that, by using the sharing tools integrated into the Portal (so-called social plug-ins), you are able to share and comment on ANSA's content and articles directly on the social networks to which the plug-ins refer (for example, by clicking the Facebook© "Like" button) and with which you are registered. In this case, ANSA only knows the Data relating to the sharing, but we cannot know how that Data is processed by the managers of the social platforms concerned. For details on this point, we suggest you read the privacy policies adopted by each social platform manager.

7. Data transfer outside the EU

ANSA may transfer your Data to third parties located in countries outside the European Union or the European Economic Area. In such a case, said third parties will be appointed as Data Processors pursuant to and for the purposes of article 28 of the GDPR and the transfer of personal data to such parties, limited to the performance of specific processing activities, will be regulated in accordance with the provisions of chapter V of the GDPR. All necessary precautions will therefore be taken to ensure adequate protection of your personal data by basing such transfer: (a) on adequacy decisions of the receiving third countries as stated by the European Commission; (b) on adequate guarantees given by the receiving third party pursuant to Article 46 of the GDPR; (c) on the adoption of corporate binding rules.

8. How long is your Data stored for?

We keep your Data according to different criteria depending on the legal basis and the context of the processing and will provide specific information regarding this at your request.

Generally speaking, according to our storage policies:

- Navigation logs are stored for 12 months from registration;
- Contractual Data relating to your registration and subscription are stored for the entire duration of the contractual relationship and thereafter for a further 10 years to exercise the right of defence, without prejudice to further storage to comply with orders from the Authorities;
- Invoicing and accounting Data are kept for 10 years after registration (in accordance with article 2220 of the Civil Code);
- Data for which processing is based on your consent is processed until you revoke your consent.

Notwithstanding the fact that you may always exercise your right to opt-out of receiving any further commercial communications for the aforementioned soft-spam purposes, your email will be used for this purpose for the duration of your subscription contract with ANSA and afterwards only for as long as you hold an account as a registered user. This storage policy may vary according to specific internal procedures aimed at further reducing the retention time, in accordance with the principle of storage limitation (Article 5.1.e. GDPR).

If you want your personal account and related services to be deactivated, you can send us an e-mail specifying your request to the following address: register@ansa.it.

9. What rights can you exercise over your Data?

The GDPR and the Privacy Code **allow you to exercise a series of rights with regard to the Data Controller** (i.e., ANSA), and the following is a brief description of what these rights are and what they are for:

- **Right to access** - allows you to request information on what personal data is being processed by the data controller and to obtain access to it;
- **Right to rectification** - you can ask for inaccurate data to be corrected and updated, and be notified of the rectification;
- **Right to deletion** - under certain conditions, you may request the permanent deletion of your personal data, with the right to be notified of such deletion;
- **Right to restrict** - under certain conditions, you can ask the data controller to restrict the processing of your personal data, with the right to be notified of said restriction;
- **Right to object** - allows you to object at any time to the processing of your Data as carried out on the basis of a legitimate interest of ANSA, unless there be legitimate reasons for ANSA to proceed with the processing which override those of the data subject, for example, for the exercise or defence of ANSA in court;
- **Right to portability** - allows you to ask the data controller processing your data electronically - on the basis of your consent or for the performance of contractual

obligations - to obtain the data in digital format and, if necessary, to communicate them to another controller you indicate.

ANSA.it

If you would like further information on this subject, **all of the rights above are listed and (legally) described in Articles 15 to 22 GDPR**. You can send us requests relating to your rights to the contact details indicated in section 3) "**How to get in touch**".

10. What can you do if you are not satisfied with the way we process your Data?

Despite our focus on data protection, you may still feel that **your rights have been compromised** or that **the way in which we process your data is contrary to or inconsistent with the law**.

Should this be the case, if you wish **you can lodge a complaint or a report with the national authority that monitors compliance with the law**. In Italy this is the Italian Data Protection Authority (here is the link to the web portal:

<https://www.garanteprivacy.it/>).

In any case, **you can always contact us** before turning to the Authorities, **for clarification and to discuss your requests**.

11. Journalistic purposes and the right to be forgotten regarding information content published on ANSA

Notwithstanding the fact that the addressees of this Information Notice are exclusively the users of the Portal - as described in paragraph 4) **A brief explanation about how to use the Portal** concerning 5) **A brief explanation of what Data we process and why** - with regard to the processing of personal data contained within the articles and information content published on the Portal (text, audio, video and images), we specify that the purposes justifying such processing are exclusively of a journalistic nature and that they follow the specific discipline provided for by:

- Articles 85 and 89 GDPR;
- Articles 136 and subsequent of the Privacy Code;
- Deontological rules on the processing of personal data in the exercise of journalistic activity published pursuant to Article 20, paragraph 4, of Legislative Decree No. 101 of 10 August 2018 - 29 November 2018.

Having said that, anyone wishing to assert the right to be forgotten provided for in Article 17 GDPR or the rights specified in paragraph 9) "**What rights can you exercise over your Data?**" in relation to personal data contained in the information content and articles published on the Portal, for which we at ANSA are the data controllers, may send a request, specifying its subject, to the following addresses:

- **Registered office** of the Agency, Agenzia ANSA Società Cooperativa – privacy – Via della Dataria 94, Roma (RM - 00187);
- **Certified company email:** agenzia.ansa@pec.ansa.it;
- Certified email of the **Data Protection Officer**, Avv. Daniela Cavallaro: rpd@pec.ansa.it

12. Data Protection Officer

In order to better ensure compliance with the legislation on the protection of personal data, ANSA, as Data Controller, has appointed, through its pro tempore Chief Executive Officer, a Data Protection Officer (DPO) with support and control, advisory, training and information purposes. The DPO of the Ansa Agency, in the person of Avv. Daniela Cavallaro can be contacted at the certified email address rpdc@pec.ansa.it.

13. Reference to other ANSA information notices

In order to read other information published by ANSA, aimed at recipients other than Portal users (in particular, but not limited to: video surveillance and processing of candidates' CVs), please refer to the following page: [Privacy Policy](#).

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