Barlucchi.com Privacy Policy

WHAT IS THE PRIVACY POLICY

This information is provided pursuant to EU Regulation 679/2016 and subsequent national legislation on adaptation (hereinafter, collectively "GDPR") and describes how (indicated in the section "Data Controllers" below, jointly in this information "Barlucchi") collect and process personal data of users or customers through its websites, in particular <u>www.barlucchi.com</u>, <u>http://www.barlucchi.com</u>, Gian Luca Barlucchi ("Sites" or "Site"), physical stores, or more generally whenever it is expressly referred to this Privacy Policy. Personal data" means any information about an identified or identifiable individual. For example, personal information is a name, an identification number, location data, an online identifier.

Barlucchi.com may modify, supplement or update this Privacy Policy from time to time, also in consideration of any changes in the applicable legislation or provisions of the Guarantor for the Protection of Personal Data. Substantial changes and updates to the Privacy Policy will be applied and brought to the attention of the parties concerned as soon as they are adopted by updating the link to the Privacy and by notifying registered users via email. In the event of changes that significantly affect the rights of the registered user, the communication will be made with reasonable notice.

1. Introduction

1.1 This Privacy Policy sets out how Barlucchi.com collects and manages your personal information.

1.2 It applies to all your dealings with us, whether through telephone, email or visiting the Barlucchi.com Website. By dealing with us you agree to the Privacy Policy.

1.3 Barlucchi.com is bound by and complies with the EU Regulation 679/2016 and subsequent national legislation on adaptation (hereinafter, collectively "GDPR").

2. Collection

2.1 Information will be collected by Barlucchi.com. If you want to contact Barlucchi.com, our contact details are on our <u>contact page</u>.

2.2 The type of information collected when you become a member of Barlucchi.com includes your name, country of residence, email address password and any other data you provide at sign up or on your profile.

2.3 At your own discretion and timing, you may choose to post additional information including but not limited to your own recipes, articles, blogs, ratings, comments, photographs and videos. By doing so you consent to Barlucchi.com using that information as described in this Privacy Policy.

2.4 If you send us personal correspondence such as emails or letters, or if other users or third parties send us correspondence about your use of the Website, we may collect that information in a file which can be accessed by Barlucchi.com personnel. We may also collect comments from others about you in our complaints records.

2.5 Your email address is never displayed to other members or made available throughout the site. Administrators of the site may contact you using this address.

2.6 If you do not provide the information requested at the sign up page we will not be able to process your application to become a member of Barlucchi.com and you will not be able to access the member only areas of the site.

3. Information which is collected automatically

3.1 We collect and use visitor date contained in server log files. The information in these log files includes your IP address, your ISP, your web browser, the date and time you visited and the pages you accessed throughout the Barlucchi.com Website.

3.2 We use cookies to store information, such as your personal preferences when you visit the Barlucchi.com Website. The main purpose of this is to retain your login information when returning rather than requiring you to login each time. Cookies are also used to store visual preferences set by the user.

3.3 We also use third-party advertisements on the Barlucchi.com Website. Some of these third-parties may use technology such as cookies and web beacons when they advertise on our site, which will also send these advertisers information including your IP address, your ISP, your browser, and in some cases, whether you have Flash installed. This is generally used for geotargeting purposes (i.e. showing ads relevant to your location) or showing certain ads based on other sites you have visited.

3.4 You can choose to disable or selectively turn off our cookies or third-party cookies in your browser settings, or by managing preferences in programs such as Norton Internet Security. However, this can affect how you are able to interact with the Barlucchi.com Website as well as other websites and could include the inability to easily login to your account.

4. Use of information

4.1 The information collected is used for the following purposes:

- 1. to provide you with a log in/profile so that you can access the members only parts of the site ;
- 2. to analyse site usage, to improve our content and product offerings as well as to customize the Website's layout and content.;
- 3. to accurately identify who is using Barlucchi.com and what their interests are;
- 4. to troubleshoot problems, resolve disputes and enforce the Barlucchi.com Terms of Use;
- 5. to send you any newsletters to which you subscribe. If you wish to opt out of receiving any email subscriptions, you can do this by clicking the unsubscribe link provided in emails sent by Barlucchi.com.
- 6. to comply with any law or legal process;
- 7. to protect Barlucchi.com's rights;
- 8. to provide to auditors, lawyers, accountants, insurers or potential insurers.

4.2 Your personal information may also be used in connection with such purposes.

5. Marketing our products and services

5.1 We may collect your personal information for the purpose of letting you know about and developing products or services from Barlucchi.com which might better serve your membership needs or promotions or other opportunities in which you may be interested.

5.2 We do not sell or rent out any personal information about you to any third party. We do disclose information in aggregate for marketing and promotional purposes, however we do not disclose any information which could be used to personally identify you.

5.3 The data may be processed by third parties carefully selected for reliability and competence who act, as data controllers, in the name and on behalf of Barlucchi.com on the basis of contractual agreements and specific instructions, as necessary or appropriate to carry out activities, including instrumental or ancillary, relevant to the purposes of data processing indicated in this statement, the main one of which consists in the provision of goods or services requested by the person concerned (eg: postal service companies, couriers, data entry companies, companies that manage marketing and newsletters, etc..). In any other case, except as provided by applicable law, personal data are not transferred and / or disclosed to third parties.

6. External Websites

You may be able to access external websites by links on Barlucchi.com. Those other websites are not subject to the Barlucchi.com Privacy Policy. Please contact or review those websites directly to ascertain their policies and terms.

7. International Users

Barlucchi.com collects, uses and maintains your information in European Union, which may have different privacy laws than your home country. If you use the Barlucchi.com site from outside of the European Union, by providing your information you are consenting to its transfer to European Union for its collection, processing and maintaining in accordance with this Privacy Policy. If personal data are transferred to countries outside the European Union, they will be transferred in accordance with the provisions of the GDPR to ensure an adequate level of protection. In particular, transfers will be made through the conclusion of Standard Contractual Clauses approved by the European Commission, a copy of which can be obtained by sending a request to the contact details contained in this statement. As soon as the personal data are no longer necessary for the purposes for which they were collected, Barlucchi.com will delete them, unless the law does not require filing obligations or the user has not consented to the processing for a longer time or to their storage.

8. Changes to the Privacy Policy

Barlucchi.com reserves the right to change the Privacy Policy at any time. We encourage you to check the Privacy Policy regularly for any changes.

9. Contacting Barlucchi.com

If you wish to contact Barlucchi.com, our details are on our contact page