

Privacy Policy and Cookie Policy of the website A-Tono

1. Introduction

In accordance with the commitment and care that **A-Tono S.r.l.** and the **A-Tono Group** is dedicated 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-ono.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-Tone S. r. l., with registered office in Milan in C.so Buenos Aires 77, is the data controller of personal data (hereinafter also the "Owner") collected on the Site pursuant to and for the purposes of the GDPR.

3. Categories of personal data processed by the Data Controller

To offer you the services provided and offered by the **A-Tono S.r.l. Website**. (below **A-Tono**), as Data Controller, must process some of your personal data, necessary for the provision of the services offered by the same through the Site (below the "Services" or, in the singular, the "Service" too).

This data may be provided implicitly by the tools you use to access and use the services 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 or services, the characteristics of the browser and the access times;
- navigation data **aimed at profiling** provided indirectly through the use of the service itself and obtained and analyzed with the consent of the user;
- **common identification data** provided by the user (e.g. name, surname, e-mail, telephone number, etc.) for the use of the services;

4. Purposes and legal bases of the processing

Your personal data will be processed by **A-Tono** with methods and procedures necessary to provide you with the required services, as well as for the fulfillment of legal obligations, in particular accounting and tax obligations. The provision of your data for the aforementioned purposes is necessary to allow the provision of the services presented on the Site and any refusal will therefore make it impossible to use the latter.

Only with your express consent your personal data may be used to carry out statistical analysis, market surveys, promotional activities through social media and sending commercial information on A-Tono's products and promotional initiatives (hereinafter also "Direct marketing purposes").

Always with your consent, your personal data may be used for profiling purposes conducted automatically by collecting information on the navigation you make during access and use of the services and, through statistical correlation algorithms, link them to the same information from other users to identify the common traits and group similar ones within classes of interest. By assigning your browser to a class of interest, our systems will subsequently be able to offer you services that are closer to your tastes and will present services that best meet your needs by reducing the level of disturbance to the use.

At the time you read this Policy, **A-Tono** uses profiling data to aggregate marketing profiles and improve their campaigns, to infer patterns of use of our products and services and to assist commercial directions in the development of digital strategies (below "Profiling Purposes" too).

Communications for market surveys or commercial information on products and promotional initiatives can be made by postal mailing, e-mail, telemarketing, sms, mms.

A-Tone S.r.l.

Registered Office: Corso Buenos Aires 77 | 20124 Milan (MI)
Social capital € 4.260.699 i.v. VAT and C.F: 130755050156

Tel: (+39) 02 32069100
Fax: (+39) 02 32069101

Site: a-ono.com
E-mail: info@a-ono.com
Pec: atono@legalmail.it

The treatments of your personal data for the Finalities of direct marketing and for the profiling purposes are optional and cannot disregard the obtaining of your consent that must necessarily comply with the conditions of Article 7 of the GDPR, thus determining the lawfulness of the treatment of your personal data

5. Methods of data processing

The processing of data will be mainly carried out with the aid of electronic or, in any case, automated tools, according to the methods, 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.

All the technical, IT, organizational, logistical and procedural security measures provided for by art. 32 GDPR, so that the adequate level of data protection required by law 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 provision of the service to:

- third parties who carry out part of the activities of treatment and / or activities connected and instrumental to the services provided by the Owner through the Site;
- 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 or to the judicial authority.

7. Transfer of Data Abroad

Your personal data will be processed by **A-Tono** within the territory of the European Union.

If, for technical and/or operational reasons, it is necessary to use subjects located outside the European Union, or it is necessary to transfer some of the data collected to technical systems and services managed in *the cloud* and located outside the European Union area, the processing will be regulated in accordance with the provisions of Chapter V of the Regulation and authorized on the basis of specific decisions of the European Union. All the necessary precautions will therefore be taken in order to guarantee the most complete protection of personal data based on: a) on adequacy decisions of the recipient third countries expressed by the European Commission; b) on adequate guarantees expressed by the third party recipient pursuant to art. 46 of the Regulation; c) on the adoption of binding corporate rules, *cd. Corporate binding rules*.

8. Duration of Processing and Storage of Personal Data

A-Tono in accordance with Article 5.1 e) of the GDPR will process the personal data you provide for the entire duration of execution of the services requested and will keep them for the following 12 months for the purpose of completing administrative activities, as well as for the time necessary to fulfill legal obligations.

If you have authorized the processing for the purposes of profiling, the anonymous data observed from time to time, will be deleted after 12 months from the beginning of the processing. If, on the other hand, you have authorized the processing of personal data for direct marketing purposes, your personal data will be deleted within two years from the beginning of the processing.

A-Tone S.r.l.

Registered Office: Corso Buenos Aires 77 | 20124 Milan (MI)
Social capital € 4.260.699 i.v. VAT and C.F: 130755050156

Tel: (+39) 02 32069100
Fax: (+39) 02 32069101

Site: a-ono.com
E-mail: info@a-ono.com
Pec: atono@legalmail.it

9. Withdrawal of consent

As required by the GDPR, if you have given your consent to the maintenance of your privacy for one or more purposes for which you have been requested, you may, at any time, revoke it totally and / or partially without prejudice to the lawfulness of the treatment based on the consent given before the revocation. The methods of withdrawing consent are very simple and intuitive, just contact the Owner of the treatment using the contact channels reported in clause n. 10 of this information.

10. 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 in whole or in part to the processing of data for the purpose of sending advertising material and market research (so-called Consent) (art. 21 **Right to object**)
- to oppose in whole or in part the processing of data in automatic or semi-automatic mode for profiling purposes (so-called Consent)
- 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 in the following ways:

- by registered letter sent to Privacy Office c/o A-Tono S. r. l.- Via Battello 44, 95126 Catania;
- by sending an e-mail to the e-mail box privacy@a-tono.com.

A-Tone S.r.l.

Registered Office: Corso Buenos Aires 77 | 20124 Milan (MI)
Social capital € 4.260.699 i.v. VAT and C.F: 130755050156

Tel: (+39) 02 32069100
Fax: (+39) 02 32069101

Site: a-tono.com
E-mail: info@a-tono.com
Pec: atono@legalmail.it

COOKIE POLICY

To make your visit to our website as convenient as possible, we use cookies to present our product range. These are small aggregates of text recorded locally in the temporary memory of your browser, and therefore in your computer, for variable periods of time depending on the need and generally between a few hours and a few years, except for profiling cookies whose maximum duration is 365 calendar days.

Through cookies it is possible to record semi-permanent information relating to your preferences and other technical data that allow easier navigation and greater ease of use and effectiveness of the site itself. For example, cookies can be used to determine if a connection has already been made between your computer and our sites to highlight news or keep "login" information. For your guarantee, only the cookie stored on your computer is identified.

To make your visit to our website as convenient as possible, for the presentation of our assortment of products we use cookies and, occasionally, some analysis tools for the use of our web pages aimed at improving their usability. Cookies are small aggregates of text recorded locally in the temporary memory of your browser, and therefore in your computer, for variable periods of time depending on the need and generally between a few hours and a few years, except for profiling cookies whose maximum duration is 365 calendar days. Usability analysis tools consist of small software programs (scripts) temporarily activated on some of the pages of our sites, which intercept in a completely anonymous way a set of events of interaction with the contents (for example the click, the mouse path, the time spent by the mouse in a certain position). At the end of the collection activities, this information is aggregated and analyzed to understand how to improve the structure of the page or service. **A-Tono does** not collect the content of the fields that the user may have filled in during one of these sessions or any other information of a personal nature but only information of a technical and operational nature. The activation of these scripts is subject to the acceptance of the cookie policy, being like the type of data collected and method of exercise to these.

Through cookies it is possible to record semi-permanent information relating to your preferences and other technical data that allow easier navigation and greater ease of use and effectiveness of the site itself. For example, cookies can be used to determine if a connection has already been made between your computer and our sites to highlight news or keep "login" information. For your guarantee, only the cookie stored on your computer is identified. In addition to cookies, we use scripts for similar purposes.

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 or product, 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

A-Tone S.r.l.

Registered Office: Corso Buenos Aires 77 | 20124 Milan (MI)
Social capital € 4.260.699 i.v. VAT and C.F: 130755050156

Tel: (+39) 02 32069100
Fax: (+39) 02 32069101

Site: a-ono.com
E-mail: info@a-ono.com
Pec: atono@legalmail.it

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 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 for which it is possible to deny consent, to guarantee your privacy.

Appropriately anonymized analytical cookies belong to this category. This site makes use of the following products: - *Google Analytics* for access and traffic statistics for internal use [INFORMATION](#)

Third-party functional and profiling cookies

This category includes both cookies provided by **A-Tono's** partners and known to it, and cookies provided by third parties not directly controlled or controllable by **A-Tono**.

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 sites. The use of data collected by these external operators through cookies is subject to their respective privacy policies and therefore these cookies are identified with the names of the respective subjects reported in the cookie management tool available in the appropriate section of this Policy. These include cookies registered by the main social networks that allow you to share articles on our sites and publicly express your appreciation for our work.

Cookies not coming from **A-Tono** partners are cookies conveyed without the control of **A-Tono**, by third parties who have the opportunity to intercept the user during your navigation even outside the **A-Tono** sites. These cookies, typically profiling, are not directly controllable by **A-Tono** which can therefore not guarantee the use that the third-party owners make of the information collected. The opposition to the use of these cookies is therefore entrusted to external tools or to the direct action on your part on the preferences of your browser. For details see section "**2. Management Cookie**".

2. Managing Cookies

If you have doubts or concerns about the use of cookies, you can always intervene to prevent their setting and reading, for example by changing the privacy settings within your browser in order to block certain types or using the rejection buttons that **A-Tono** makes available to you in this Policy.

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

3. Acceptance or Rejection of Cookies

By continuing to browse this site, closing the information band, or clicking on any part of the page or scrolling to highlight further content, put in place a manifest and explicit act of acceptance of **the A-Tono** Cookie Policy and cookies will be set and collected for which the refusal has not been declared. In case of non-acceptance of cookies by abandonment of navigation, any cookies already registered locally in your browser will remain registered there but will no longer be read or used by **A-Tono** until a subsequent and possible acceptance of the Policy. You will always have the possibility to remove these cookies at any time through the methods referred to in the sites mentioned in the paragraph "Management of cookies or through the site <http://www.youronlinechoices.eu/it/> for those not controlled by **A-Tono**.

A-Tone S.r.l.

Registered Office: Corso Buenos Aires 77 | 20124 Milan (MI)
Social capital € 4.260.699 i.v. VAT and C.F: 130755050156

Tel: (+39) 02 32069100
Fax: (+39) 02 32069101

Site: a-tono.com
E-mail: info@a-tono.com
Pec: atono@legalmail.it

4. Duration of The Processing of Cookies

The cookies managed by **A-Tono** have a maximum duration of 365 days, except for voluntary renewals made by you by reiterating your consent.

The profiling cookies managed by **A-Tono** are anonymous and remain within the statistical systems and profiling platforms for exclusive statistical purposes even if no longer attributable to your browser.

Cookies managed by third parties have the durations indicated in the respective Cookie Policy.

5. Rights of the interested party

You can exercise your right to object to the full use of cookies by abandoning this site and thus also refusing the use of essential technical cookies necessary for its operation.

If you wish to refuse the use of one or more non-essential cookies, you can refuse consent for cookies managed by **A-Tono** or its partners directly from this Policy with the "reject" selectors shown next to the name of the cookie or its supplier.

The renunciation of third-party cookies not governed by **A-Tono** can instead be made according to the instructions available on the website <http://www.youronlinechoices.eu/it/>.

Any request for information or clarification or exercise of rights can be addressed to the Data Processor at the following addresses:

- Privacy Office c/o A-Tono S. r. l.- Via Battello 44, 95126 Catania, Italy
- or 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@gdpd.it or through the <http://www.gdpd.it> website.

A-Tone S.r.l.

Registered Office: Corso Buenos Aires 77 | 20124 Milan (MI)
Social capital € 4.260.699 i.v. VAT and C.F: 130755050156

Tel: (+39) 02 32069100
Fax: (+39) 02 32069101

Site: a-tono.com
E-mail: info@a-tono.com
Pec: atono@legalmail.it