

COOKIE POLICY

Pursuant to the current legislation on the protection of personal data (“**Privacy Legislation**”), including the EU Regulation 2016/679 (“**GDPR**”) and the provisions of the Italian Data Protection Authority (“**Garante Privacy**”), Pevero Golf S.r.l., as the data controller (the “**Company**” or the “**Data Controller**”), provides users (hereinafter referred to as the “**Users**” or the “**User**”) with the following information relating to the cookies installed on the domain www.peverogolfclub.com (the “**Website**”) and its subdomains accessible through the Website.

What are cookies?

Cookies are text and numeric files which are installed through the browser application in the memory of the User’s device (PC, smartphone or tablet) connected to the Internet. These files allow to collect information on the User’s browsing activities on the Website, in order to ensure the operativity of the latter and to improve the User’s browsing experience.

Cookies can be permanently stored on the User’s device (the so-called “persistent cookies”) until their established expiring date (minutes, days, years) or deleted automatically when the User closes the browser (the so-called “session cookies”).

Cookies can be installed by the Website (the so-called “first-party cookies”) or by other websites (the so-called “third-party cookies”).

Types of Cookies Used and their Purposes

- Technical cookies

These cookies are used to ensure and simplify activities which are strictly necessary for the operativity and functionality of the Website (e.g. saving browsing session and the selected settings such as language and browsing preferences, managing the distribution of data traffic, etc.), for the browsing on the Website as well as for the collection of certain information about Users, in aggregate form, following their anonymisation.

The Website uses first-party and third-party technical cookies.

- Analytical cookies

These cookies are used to collect information on Users’ browsing activities on the Website (e.g. number of visitors, pages visited, time spent on the Website, etc.).

The Website uses first-party and third-party analytical cookies.

- Profiling cookies

These cookies are necessary to create User’s profiles and perform actions in line with the User’s preferences expressed while visiting the Website.

The Website does not use profiling cookies.

Cookies used on the Website

The characteristics of the cookies used on the Website are detailed in the tables below.

The Website uses the following first-party cookies:

Cookie	Domain	Type of cookie	Purposes	Duration	Disabling cookies
--------	--------	----------------	----------	----------	-------------------

[name of the cookie]	www.peverogolfclub.com	[e.g. technical, analytical or profiling cookies]	[e . g . operativity ; marketing; market analysis by means of anonymised data]	[e.g. 1h; session or permanent cookie]	See also next section (“ Managing cookie preferences ”).
[•]			[•]	[•]	[•]
[•]			[•]	[•]	[•]
[•]			[•]	[•]	[•]

The Website uses the following third-party cookies:

Cookie	Domain	Type	Purposes	Duration	Disabling cookies
[name of the cookie]	[www.google.com]	[e.g. technical, analytical or profiling cookies]	[e . g . operativity ; marketing; market analysis and by means of anonymised data]	[e.g. 1h; session or permanent cookie]	[www.[•]] See also next section (“ Managing cookie preferences ”).
[•]			[•]	[•]	[•]
[•]			[•]	[•]	[•]
[•]			[•]	[•]	[•]

Please note that third-party cookies are under the direct control and liability of the third-party itself. Third-party cookie providers are therefore obliged to comply with the relevant legislation. For this reason, please refer to the links to the third-party’s websites and find third party’s forms for collecting consent to the use of cookies as well as related cookie policies.

Managing cookie preferences

A banner containing a brief notice is displayed at first access to the Website. By continuing to browse, accessing another area or selecting an element of the Website (e.g. an image or a link), the User consents to the use of cookies. Such consent is recorded with a “technical cookie”.

To find out how to disable third-party cookies, please click on the links in the “Disabling cookies” column of the related above table.

The User can find here below instructions on how to disable cookies directly from User’ browser:

- **Internet Explorer**

1. Open Internet Explorer;
2. Click on the “Tools” button and then on “Internet Options”;
3. Select the “Privacy” tab and move the slider to the level of privacy you want to set (upwards to block all cookies or downwards to allow all cookies);

4. Then click on "OK".
- **Google Chrome**
 5. Open Google Chrome;
 6. Click on the "Tools" icon;
 7. Select "Settings" and then "Advanced Settings";
 8. Select "Content settings" under "Privacy";
 9. On the "Cookies" tab, you can deselect cookies and save your own preferences.
 - **Firefox**
 10. Open Firefox;
 11. Press the "Alt" button on your keyboard;
 12. From the toolbar at the top of your browser, select "Tools" and then "Options";
 13. Then select the "Privacy" tab;
 14. Go to "History Settings" and then to "Use Custom Settings";
 15. Deselect "Accept cookies from websites" and save your preferences.
 - **Opera**
 16. Open Opera;
 17. Click on "Settings" in the browser menu and select "Settings";
 18. Select "Quick Preferences";
 19. Deselect "Enable cookies";
 - **Safari**
 20. Open Safari;
 21. Choose "Preferences" from the toolbar, then select the "Security" panel in the following dialog box;
 22. In the "Accept cookies" section you can specify if and when Safari should save cookies from websites. For more information, click on the "Help" button (marked with a question mark);
 23. For more information about the cookies that are stored on your computer, click on "Show Cookies".

Disabling cookies, however, may result in some functions of the Website not being performed correctly.

Disclosure and dissemination of data

The data collected using cookies may be processed by our employees and collaborators as authorised subjects under the Privacy Legislation.

Such data may also be processed by trusted companies which provide technical and organisational services on our behalf. These companies are our direct partners and operate by virtue of a specific act of appointment as data processors.

In particular, in the context of the data processing carried out through this Website, the Company, as the Data Controller, has appointed the Company All me Connection S.r.l. as data processor for the management and technical maintenance of the Website.

The list of all the appointed data processors involved in the processing of User's personal data through the Website is constantly updated and is available on request by sending an e-mail to the following address: privacy@smeraldaholding.com.

The data collected using cookies will not be disclosed or transferred to third parties.

The data collected using Google cookies may be transferred by this third party outside the European Union, in particular to the United States of America, in accordance with the Privacy Legislation. For more information please visit the relevant cookie policy of Google, available by clicking on the links contained in the “Disabling cookie” column of the above table.

The data collected using cookies will not be disseminated.

User's rights

Users are always entitled to access their personal data, to request their rectification, updating if incomplete, incorrect or unlawfully collected, erasure and to revoke at any time the consent given or to oppose, or restrict their processing for legitimate reasons.

Unless the processing is necessary, Users also have the right to receive (or transmit directly to another data controller) personal data in a structured, commonly used and machine-readable format, and to request the erasure and/or destruction of such data.

To exercise their rights, Users may contact the Company or the DPO by sending a registered letter with acknowledgment of receipt or an e-mail to the following addresses: privacy@smeraldaholding.com and dpo@DP-Advisory.eu.

Users may also lodge a complaint with the Italian Data Protection Authority following the instructions on the Garante Privacy's website:

<http://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/4535524>

Data Controller and data protection officer

The Data Controller is Pevero Golf S.r.l., with registered office in Arzachena, Porto Cervo, Casa Il Ginepro 1/A.

Data Protection Advisory S.r.l. is the data protection officer of the Company, domiciled for the assignments at the registered office of the Company. The DPO can be contacted at the following e-mail address: dpo@DP-Advisory.eu.

Additional information

For further information, please refer to the [Privacy Policy](#) of this Website.

Last update: [●] 2019