

Privacy Policy for Website Users (1.0)

In accordance with the European Union General Data Protection Regulation (GDPR 2016/679), we hereby inform you of how your personal data is processed.

1. Who is the Data Controller

The Data Controller of the personal data is the company **WESTI S.R.L.**, Corso Matteotti no. 10 – Milan (MI), Tax Code and VAT no. 06227950968, in the person of its legal representative, Mr CLAUDIO TIERNO.

2. Who is the Data Protection Officer

The Data Controller has appointed a Data Protection Officer (DPO). You may contact the Data Protection Officer for matters relating to the processing of your data at the following address: dpo@romaoutletvillage.com

3. How we collect your Personal Data

We collect your Personal Data automatically through the web portal.

4. What data we collect and why we need it (category of personal data, purpose, legal basis for the processing, nature of the provision of data and retention period)

4.1. Online connection data

Category of data: we automatically collect the online connection data relating to the connection with our IT systems (IP address, browser type, parameters of the device used to connect, name of the internet service provider, date and time of the visit, web page of origin and exit, country of origin, pages of the site visited, regional and language settings, and the numeric code indicating the status of the response given by the server. The Data Controller may also store cookies, as described in greater detail in the Cookies section.

Purpose of the processing and nature of the data: we need the online connection data for IT security and network protection reasons, and to monitor the proper functioning of the application and the portal. The data is required to use the portal.

Legal basis: the legal grounds, or legal basis, for the processing of such data is the legitimate interest of the Data Controller in protecting the network and ensuring the proper functioning of the services provided;

Retention period: we retain the online connection data until our legitimate interest has been satisfied, for periods not exceeding 6 months, except for extensions related to investigative activities.

5. What are Cookies?

Cookies are small text strings that a site sends to and stores on your computer or mobile device, then transmits back to the same site on your next visit.

Thanks to cookies, the site remembers your actions and preferences.

In addition to the cookies sent by the site, you may also receive, while browsing, cookies on your computer or mobile device from other sites (so-called "Third Parties"). Cookies may remain on your computer or mobile device for the duration of a session (so-called session cookies) or for longer periods (so-called persistent cookies).

Cookies are divided into technical cookies, analytics cookies (also called statistical), and marketing cookies (also called profiling).

Technical cookies are used to enable the operation of the site, for example, to keep you identified as a user of the site during the session, and are divided into necessary cookies (which ensure basic functions such as page navigation and access to protected areas of the site) and preference cookies (which store information that affects the behaviour or appearance of the site).

Analytics cookies (so-called statistical) are used to collect information on the use of the site and may have a "reduced identifying power", not allowing your connection to be traced as they are masked (anonymous data).

Marketing cookies (so-called profiling) are used to track browsing on the network and to create profiles of your tastes, habits, choices, etc., so that advertising messages in line with your preferences and habits may be delivered to your device.

6. Which types of cookies we use and why we need them (category of personal data, purpose, legal basis for the processing, nature of the provision of data)

6.1. Technical Cookies

Category of data: data relating to technical cookies (see the table below for the list of cookies we use);

Purpose of the processing and nature of the data: we need the data to ensure the proper functioning of the site. Providing the data is optional, but if cookies are disabled, the site may become unusable or difficult to use.

Legal basis: the legal grounds for the processing of such data is the legitimate interest of the Data Controller in the proper functioning of the site.

Name	Retention period	Description of use
displayCookieConsent	1 year	Technical cookies
PHPSESSID	browser closure	Technical cookies

7. Managing, deleting and disabling cookies

Web browsers allow you to accept, control and disable cookies through their own settings. We refer you to the usage and support information provided by your browser provider; however, for your convenience, we provide below the path to follow to manage cookies in the most common browsers:

- Cookie settings for [Microsoft Edge](#)
- Cookie settings for [Firefox](#)
- Cookie settings for [Chrome](#)
- Cookie settings for [Safari](#)

8. Special categories of data

We do not ask you to provide so-called “special” data, i.e. personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data intended to uniquely identify a natural person, or data concerning health, sex life or sexual orientation.

9. How we process the data (processing methods)

Throughout the period during which your data is processed, we adopt appropriate security measures to prevent unauthorised access to, disclosure, alteration, or destruction of the data, and we will require third-party suppliers to adopt comparable security measures.

The processing is carried out using paper, electronic and/or telematic tools, with organizational and logical methods strictly related to the purposes indicated.

10. To whom we disclose your data (transfer to third parties)

Your personal data is disclosed to third parties and/or recipients whose activity is necessary for the provision of the services offered and, where applicable, to comply with specific legal obligations. The third parties and/or recipients will process your personal data as Processors, acting under the authority of the Data Controller, solely for the purposes set out in this privacy policy.

The third parties and recipients who may receive disclosure of the data subject’s personal data are:

- IT service and IT technical support providers;
- Parties necessary and instrumental to the provision of the services;
- Companies of the Group to which the Data Controller belongs;
- Consultants and/or professionals (e.g. lawyers, notaries, auditors, advisors);
- Private bodies responsible for inspections and audits of various kinds;
- Public bodies, the Judicial Authority, supervisory and control authorities;

You may request the complete list of the parties acting as external Processors using the contact methods described in the paragraph “how you can contact us”.

The personal data will be processed by the Data Controller’s staff, who are expressly authorised to carry out the processing and provided with appropriate operating instructions.

11.To which countries we transfer your data (transfer of personal data to a third country)

Your personal data is not transferred to non-EU countries; should such a need arise, it will be our obligation to adopt all the necessary measures to ensure that the processing complies with the applicable legislation.

12.What are your rights? (Rights of the data subject)

as a data subject of the processing, you may exercise the following rights:

- Right of access: you have the right to obtain confirmation as to whether or not processing of your Data is taking place and, in addition, to receive all information relating to such processing;
- Right to rectification: you have the right to obtain the rectification of your data in our possession, where it is incomplete or inaccurate;
- Right to erasure: in certain circumstances, where the data is not necessary to comply with legal obligations, you have the right to obtain the erasure of your data held in our archives;
- Right to restriction of processing: where specific conditions are met, you have the right to obtain the restriction of the processing relating to your data;
- Right to data portability: you have the right to receive your personal data in a structured, commonly used and machine-readable format, and you have the right to transmit it to another data controller without hindrance.
- Right to object: you have the right to object to the processing of your Data;
- Right to lodge a complaint: you have the right to lodge a complaint with the Supervisory Authority if your data has been processed in breach of the GDPR;
- Right to withdraw consent: where the legal basis is based on your consent, you have the right to withdraw, at any time, your consent for the processing operations based on such legal basis. The withdrawal will not affect processing carried out prior to it.

13.How can you exercise your rights

To exercise the rights, you may use the contact methods described in the following paragraph, "how you can contact us".

14. How you can contact us (contact details of the Data Controller and of the Data Protection Officer)

You may contact us by email at the address privacy@romaoutletvillage.com. Alternatively, you may contact us by registered letter at the following address:

**WESTI SRL
CORSO GIACOMO MATTEOTTI, 10
MILANO (MI) 20121**

The Data Controller undertakes to respond to your requests within 1 month, except in cases of complexity, in which case it may take up to 3 months. In any event, the Data Controller will explain the reason for the delay within one month of your request.

15. How we make changes to the Privacy Policy

We reserve the right to amend or simply update, in whole or in part, this Privacy Policy, including in the event of changes to the applicable legislation. We invite you to visit this section regularly to stay informed about the most up-to-date version of the Privacy Policy.