

Why this information is provided

The methods of management of the website with regard to processing of the data of users who visit it are described on this page. When this website is visited, data relating to identified or identifiable people may be processed.

This policy is provided, in accordance with Art. 13 of Regulation (EU) no. 2016/679 (GDPR 2016/679), to anyone who interacts with the web services of Rail S.r.l. for the protection of personal data, accessible on-line starting from the website:

www.railgroup.it

The policy is provided only for the **Rail S.r.l.** website and not for any other websites visited by the user through links. The policy is also based on Recommendation no. 2/2001, which the European data protection authorities, in the Working Party set up by Art.29 of Directive no. 95/46/EC, adopted on 17 May 2001 to identify several minimum requirements for *on-line* collection of personal data and, in particular, the methods, times and nature of the information which the data controllers must provide to users when they visit the *web* pages, irrespective of the reasons for doing so.

Types of data processed

Browsing data

The computer systems and software procedures used for functioning of these websites acquire certain personal data during their normal operation, the transmission of which is implicit in use of Internet communication protocols.

This information is not collected in order to be associated with identified data subjects but, due to its nature and as a result of processing and association with data held by third parties, could allow users to be identified.

This data category includes IP addresses or domain names of the computer used by users connecting to the website, URI (*Uniform Resource Identifier*) notation addresses of the requested resources, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the digital code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the user's operating system and computer environment.

This data is used solely in order to obtain anonymous statistical information on use of the website and to check correct functioning and is erased immediately after processing. The data may be used to ascertain liability in the case of possible cyber-crimes damaging the website: with the exception of this case, the data on web contacts currently does not persist for more than seven days.

Data provided voluntarily by the user

Rail S.r.l. will process the personal data that the user provides upon registration, on requesting a specific service or, in any case, in the relationship with www.railgroup.it

This data may comprise:

- identity and contact details (name, company name, e-mail address, telephone number, etc.)

Providing the personal data is a necessary requirement for providing and consequent use of the services requested. Failure to provide certain data (personal details, e-mail address, etc.) could therefore make it impossible for the Controller to supply the services requested.

Rail S.r.l., will indicate each time, through its forms on www.railgroup.it, the data that is strictly necessary for use of the services and the further data that is only necessary to improve the user's experience of those services.

Controller, Processor and DPO

The Controller is **Rail S.r.l.** in the person of the legal representative. The list of external Processors is regularly updated and may be consulted at the registered office of the company. A DPO (Data Protection Officer) has not been appointed.

Purposes of processing of the data

The personal data you provide will be used for the following purposes:

- a) To provide the services requested by the user on www.railgroup.it
 - to allow the user to contact the company;
 - to ensure correct browsing on www.railgroup.it

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- b) to send communications on the services offered, newsletters and customised news, containing promotional material and initiatives relating to the company's activities and services, using automated means (e-mail).

Nature of providing the data

It is *obligatory* to provide the personal data for the *purposes described in letter a)*: failure to do so will make it impossible for **Rail S.r.l.** to proceed with full supply of the services offered.

It is optional to provide the personal data for the *purposes described in letter b)* and the only consequence of not doing so will be that advertising messages or newsletters cannot be sent. Supply of the service offered will not be affected.

Processing methods

All the personal data is processed primarily using electronic tools and methods, although manual processing is not excluded *a priori*.

The data will be stored in a form that allows identification of the data subjects solely for the time strictly necessary to achieve the purposes for which the data was originally collected and, in any case, for the times required by law.

In order to guarantee that the personal data is always accurate, up-to-date, complete and pertinent, users and other data subjects are asked to indicate any intervening changes at the following e-mail address: info@railgroup.it

The personal data will only be processed for the time necessary to the purposes described above.

Security measures will be adopted that guarantee the confidentiality of the data subject to whom the data relates and to avoid undue access by third parties or unauthorised personnel.

Data processing location

The processing associated with the web services of this website takes place at the registered office and operative headquarters of **Rail S.r.l.** and is only performed by specifically assigned personnel. The data is also processed in any other place in which the parties involved in processing are located. In detail, all the data relating to the website, and also the relative back-ups, are stored on servers hosted at data centres within the European Union and complying with current EU regulations.

Contact the Controller for further information.

Data processing times

The data is processed for the time necessary to provide the service requested by the user, or required by the purposes described in this document, and the user may ask for processing to cease or the data to be erased at any time.

Disclosure of data to third parties

No data will be disclosed. If it is necessary to communicate the data to third-party suppliers, advisers or partners for needs associated with supply of the services, the Controller will appoint them as data processors pursuant to Art. 28 of the Regulation, based on the abilities, experience and reliability demonstrated.

The data subjects may request, at any time, a complete list of the processors appointed each time by **Rail S.r.l.**, by sending the request via e-mail to the Controller at: info@railgroup.it.

It is understood that the personal data of users might be freely disclosed to third parties, such as law enforcement or public authorities, whenever this is permitted by law or required by an order or measure of a competent authority. Said parties will process the data as independent controllers.

Controller of cookie processing

The installation of cookies and other tracking systems by third parties through the services used on this website cannot be technically controlled by the Controller and any specific reference to cookies and tracking systems installed by third parties is to be considered as indicative.

In view of the complexity of identifying cookie-based technologies and their very close connection with functioning of the Internet, the user is invited to contact the Controller if they wish to receive any further information on cookies and their use (by third parties, for example) through this website.

Rights of the data subject

You may exercise, at any time, pursuant to Arts. 15-22 of the GDPR 2016/679, the right to:

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- obtain confirmation of whether or not personal data concerning you is being processed;
- know the purposes of processing, the categories of personal data, the recipients or categories of recipient to whom the personal data has been or will be disclosed and, where possible, the storage period;
- rectification or erasure of the data;
- restriction of processing;
- data portability, meaning the right to receive the data from a controller, in a structured, commonly used and machine-readable format, and transmit that data to another controller without impediment;
- object to processing, at any time and also in the case of processing for direct marketing purposes;
- object to an automated decision-making process relating to natural persons, including profiling.

*In order to exercise your rights as the data subject and/or request further information, contact the Controller, which is **Rail S.r.l.**, with registered office at **Via A. Grandi 16, Vezzano Sul Crostolo (RE)**, Tel. **0522 603801**, e-mail **info@railgroup.it***

COOKIE POLICY

This document contains information on the technologies that allow this website to achieve the purposes described below. These technologies allow the Controller to collect and save information (through the use of cookies, for example) or to use resources (by executing a script, for example) on the user's device when it interacts with this

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website.

For the sake of simplicity, these technologies are briefly indicated as “tracking tools”, unless there is a reason to differentiate between them.

For example, although cookies may be used in both web and mobile browsers, it would be misleading to refer to cookies in the context of applications for mobile devices, since these are tracking tools that require the presence of a browser. This is why the term cookie is only used in this document to indicate that specific type of tracking tool.

Several of the purposes for which these tracking tools are used could also require the user’s consent. If consent is given, it may be freely withdrawn at any time, following the instructions contained in this document.

This website uses tracking tools managed directly by the Controller (commonly referred to as “first-party” tracking tools) and tracking tools that enable services provided by third parties (commonly referred to as “third-party” tracking tools). Unless otherwise specified in this document, said third parties have access to the respective tracking tools. The duration and expiry of cookies and other similar tracking tools may vary, depending on the settings entered by the Controller or by each third-party supplier. Several of them expire when the user’s browsing session ends.

In addition to what is specified in the description of each of the categories indicated below, users may also obtain more detailed and up-to-date information on the duration, together with any other relevant information (such as the presence of other tracking tools), in the data protection policies of the respective third-party suppliers (through the links provided) or by contacting the Controller.

Activities that are strictly necessary to guarantee functioning of this website and supply of the service

This website uses the cookies commonly known as “technical cookies”, or other similar tracking tools, to perform the activities strictly necessary to guarantee functioning or supply of the service.

a) Third-party tracking tools

a.1 - Traffic optimisation and distribution

This type of service allows the website to distribute its content through servers located throughout the territory and to optimise its performance.

The personal data processed depends on the characteristics and methods of implementation of these services, which are designed to filter communications between this website and the user’s browser.

In view of the distributed nature of this system, it is difficult to identify the locations in which the content that could contain the user’s personal data is transferred.

a.2 - Hosting and back-end infrastructure

The purpose of these types of services is to host the data and files that allow this website to function, allow distribution and provide a ready-to-use infrastructure to provide specific functions of the website.

Other activities that involve the use of tracking tools

Simple interactions and functions

This website uses tracking tools to allow simple interactions and enable functions that allow users to access specific resources of the service and that simplify communication with the Controller.

Management of tags

This type of service is functional to centralised management of the tags or scripts used on this website. Use of these services results in the user’s data flowing through them and, if necessary, being retained.

Google Tag Manager (Google Ireland Limited)

Google Tag Manager is a tag management service provided by Google Ireland Limited.

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Personal data processed: Cookies and use data.

Processing location: Ireland – [Privacy Policy](#).

Measurement

This website uses tracking tools to measure traffic and to analyse users' behaviour, in order to improve the service.

Statistics

The services contained in this section allow the Controller to monitor and analyse traffic data and serve to track the user's behaviour.

Google Analytics (Google LLC)

Google Analytics is a web analytics service provided by Google LLC ("Google"). Google uses the personal data collected to track and analyse the use of this website, to compile reports and share them with the other services developed by Google.

Google could use the personal data to contextualise and customise the adverts on its own advertising network.

Personal data processed: Cookies and use data.

Processing location: United States – [Privacy Policy](#) – [Opt Out](#).

How to manage preferences and give or withdraw consent

Various methods exist for managing tracking tool preferences and for giving or withdrawing consent, where required.

Users can manage their tracking tool preferences directly through the settings on their devices, such as preventing the use or storage of tracking tools.

In addition, whenever use of tracking tools depends on consent, the user may give or withdraw consent by setting their preferences in the cookie policy or by updating those preferences through the widget of the tracking settings, if present.

Specific functions of the browser or device can also be used to remove the tracking tools previously saved.

Other tracking tools present in the local memory of the browser can be removed by deleting the browsing history.

In the case of third-party tracking tools, users can manage their preferences and withdraw consent by visiting the relative opt-out link (if one is available), using the tools described in the third-party data protection policy or contacting the party concerned directly.

Identifying the tracking tool settings

Users can, for example, find information on how to manage the cookies in several of the most widely used browsers at the following addresses:

- [Google Chrome](#)
- [Mozilla Firefox](#)
- [Apple Safari](#)
- [Microsoft Internet Explorer](#)
- [Microsoft Edge](#)
- [Brave](#)
- [Opera](#)

Users can also manage several tracking tools for mobile applications and disable them through the specific device

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settings, such as advertising settings for mobile devices or tracking settings in general (users can consult the device settings to identify the pertinent one).