



Privacy policy on the processing of personal data pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (GDPR). Effective as of {data-inizio-efficacia}

INTRODUCTION

This information takes into account the provisions of the GDPR and the Privacy Code (Legislative Decree 30 June 2003 n. 196). The document has also been drafted in accordance with the Guidelines of the Privacy Guarantor (especially the Guidelines for combating spam issued by the Privacy Guarantor on July 4, 2013).

Data Controller: {dati-titolare-del-sito}

Site to which this privacy policy refers:{dati-del-sito} (**Sito**).

The Data Controller has not appointed a DPO. Therefore, you may send any inquiries directly to the Data Controller.

GENERAL INFORMATION

This document describes how the Data Controller processes your personal data.

The following describes the main processing of your personal data. In particular, we explain the legal basis of the processing, whether the provision of personal data is compulsory and the consequences of not providing personal data. To better describe your rights, if necessary, we have specified if and when a certain processing of personal data is not carried out.

Site registration

The Site does not offer the possibility of registration. Therefore, the Data Controller does not process your personal data for this purpose.

Purchases on the Site

Your personal data will be processed to allow you to make purchases on the Site. in the case of making an online purchase order, to allow the conclusion of the purchase contract and the proper execution of transactions related to the same (and, if necessary under the legislation, to fulfill tax obligations). The legal basis for the processing is the obligation of the Data Controller to execute the contract with the data subject or to comply with legal obligations. Apart from the above (and therefore your consent), the Data Controller may process your data for the purpose of so-called "soft-spam", governed by art. 130 of the Privacy Code. This means that limited to the email you provided in the context of a purchase through the Site, the Data Controller will process the email to allow direct offers from similar products/services, unless you object to such processing in the manner provided by this policy. The legal basis for processing is the legitimate interest of the Data Controller to send this type of communication. This legitimate interest can be considered equivalent to the interest of the data subject in receiving "soft-spam" communications. The Data Controller may send emails to remind the user to complete a purchase. The legal basis for this processing is the legitimate interest of the Data Controller in sending this type of communication.

Answering your requests

Your data will be processed to respond to your requests for information. The conferment is optional, but your refusal will make it impossible for the Data Controller to answer your questions. The legal basis for the processing is the legitimate interest of the Data Controller in fulfilling your requests. This legitimate interest is equivalent to the user's interest in receiving a response to communications sent to the Data Controller.

Marketing

The Data Controller will not send you advertising material and/or newsletters regarding its own products or those of third parties.

Profiling

The Data Controller does not carry out "profiling" with your personal data. Therefore, it will not send you advertising material and/or newsletters relating to its own products or third parties of your specific interest.

Data transfer

The Data Controller does not transfer your personal data to third parties.

Geolocalization

The Site does not implement tools to geolocate the user's IP address.

Curriculum Vitae

It is not possible to send CVs via the Website. Your data will therefore not be processed for these purposes.

Booking Service

There are no third-party appointment booking systems active on the Site. Therefore, your data will not be processed for this purpose. In any case, you can always contact the Data Controller at the contacts indicated in the heading.

Communication of personal data

As part of its ordinary business, the Data Controller may communicate your personal data to certain categories of subjects. In article 2 you can find the list of subjects to which the Data Controller communicates your personal data. In order to facilitate the protection of your rights, Article 2 may specify in certain cases when your data is not communicated to third parties.

The "communication" of personal data to third parties is different from the "transfer" (governed by the preceding point). In fact, in the communication the third party to whom the data is transmitted can use it only for the specific purposes described in the relationship with the Data Controller. In the transfer, instead, the third party becomes the autonomous Data Controller. Moreover, to transfer your personal data to third parties is always required your consent.

Without prejudice to the foregoing, it is understood that the Data Controller may still use your personal data in order to correctly fulfill the obligations provided for by the laws in force.

PRIVACY POLICY

Art. 1 Method of processing

1.1 The processing of your personal data will be mainly carried out with the help of electronic or automated means, according to the methods and with the tools suitable to ensure their security and confidentiality in accordance with the GDPR.

1.2 The information acquired and the methods of treatment will be relevant and not excessive in relation to the type of services rendered. Your data will also be managed and protected in secure computer environments appropriate to the circumstances.

1.3 Through the Site are not processed "special data". Particular data are those that can reveal racial and ethnic origin, religious, philosophical or other beliefs, political opinions, membership of parties, trade unions, associations or organizations of a religious, philosophical, political or trade union, health and sex life.

1.4 No judicial data is processed through the Site.

Art. 2 Communication of personal data

The Data Controller may communicate your personal data to certain categories of subjects. The subjects to whom the Data Controller reserves the right to communicate your data are indicated below:

- The Data Controller may communicate your personal data to all those subjects (including Public Authorities) who have access to personal data by virtue of regulatory or administrative measures.
- Your personal data may also be disclosed to all those public and / or private individuals and / or legal entities (legal, administrative and tax, judicial offices, Chambers of Commerce, Chambers and Offices of Labor, etc.), if the communication is necessary or functional to the proper fulfillment of obligations under the law.
- The Data Controller uses employees and/or collaborators in any capacity. For the proper functioning of the Site, the Data Controller may communicate your personal data to these employees and/or collaborators.
- In its ordinary activity of managing the Site, the Data Controller makes use of companies, consultants or professionals in charge of the installation, maintenance, updating and, in general, the management of the hardware and software of the Data Controller or which the latter uses for the provision of its services. Therefore, only with reference to these purposes, your data may also be processed by these subjects.
- The Data Controller does not use CRM platforms (companies that carry out the activity of sending automated communications to users. Therefore, your personal data are not communicated to these companies.
- The Data Controller does not use external companies to provide customer care services. Therefore, your personal data will not be processed for this purpose.
- Buyers' personal data are not communicated to couriers or forwarding agents.

The Data Controller reserves the right to modify the above list in accordance with its ordinary operations. Therefore, you are invited to regularly access this information to check to which subjects the Data Controller communicates your personal data.

Art. 3 Personal data retention

3.1 This article describes how long the Data Controller reserves the right to retain your personal data.

- User data will be kept only for the time necessary to ensure the proper provision of the services offered through the Site.
- For the purpose of executing the sales contract, the data will be kept for 10 years from the date of receipt of the purchase order. This is to allow the Data Controller to exercise its right of defence and to prove the Seller has performed its duties.
- For customer care purposes, data will be deleted once the service is completed.
- As provided for in Article 2220 of the Civil Code, invoices, as well as all accounting records in general, are kept for a minimum period of ten years from the date of registration, so that they can be presented in the event of an audit.

3.2 Without prejudice to the provisions of Article 3.1, the Data Controller may retain your personal data for the time required by specific regulations, as amended from time to time.

Art. 4 Transfer of personal data

4.1 The Data Controller is based within the European Union. Therefore, the processing of your data is safe from a regulatory point of view as it is governed by the GDPR. If the transfer of your personal data takes place in a non-EU country and for which the European Commission has issued an adequacy opinion, the transfer is in any case considered safe from a regulatory point of view. This Article 4.1 indicates from time to time the countries to which your personal data may possibly be transferred and where the European Commission has issued an adequacy opinion.

- You are therefore invited to access this article regularly to check whether the transfer of your personal data takes place in a country with these characteristics.

4.2 Without prejudice to what is stated in article 4.1, your data may also be transferred to countries outside the EU for which the European Commission has not issued an adequacy opinion. You are therefore invited to regularly review this article 4.2 to find out to which of these countries your data may be transferred.

4.3 In this article, the Data Controller indicates the countries in which it may specifically direct its activities. This circumstance may imply the application of the legislation of the country of reference, together with that of the GDPR.

- At the request of the user, the Data Controller will apply to the processing of personal data any more favourable legislation provided for by the user's national legislation.

Art. 5. Your rights under the GDPR

Pursuant to art. 13 of the Privacy Regulations, the Data Controller informs you that you have the right:

- to request from the Data Controller access to your personal data and the rectification or erasure of the same or the restriction of the processing thereof or to object to the processing thereof, in addition to the right to data portability
- revoke consent at any time without affecting the lawfulness of the processing based on the consent given before revocation
- to lodge a complaint with a supervisory authority (e.g. the Italian Data Protection Authority).

The rights referred to above may be exercised by making a request without formalities to the contacts indicated in the Introduction.

Art. 6. Amendments

The Data Controller reserves the right to make changes to this policy at any time, giving appropriate publicity to users of the Site and ensuring in any case an adequate and similar protection of personal data. In order to view any changes, you are invited to regularly consult this policy. In case of substantial changes to this privacy policy, the Data Controller may give notice of such changes also by email.

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