

Notice on the use of personal data

In their capacity as Data Controller, Eredi Caimi Ltd., registered office Via G. Pascoli 139, Olgiate Olona (VA), CF and P.IVA 00163690126, informs you that, pursuant to art. 13 of Legislative Decree no. 196, 30/06/2003 (hereafter "Privacy Code") and art. 13 of EU Regulation no. 2016/679 (hereafter "GDPR"), your data will be processed as follows:

1. Data to be Processed

The Controller shall use the personal, identification data (for ex. name, surname, company name, address, telephone, e-mail, bank- and payment-details) – hereafter "personal data" or "data" – communicated by you in agreeing a contract for provision of services by the Controller.

2. Purpose of Processing

Your personal data shall be used:

A/without your express consent (art. 24, a), b), c) of Privacy Code and art. 6 b), e) of GDPR, for the following purposes:

- conclusion of service contracts with the Controller
- fulfillment of contractual, pre-contractual and fiscal obligations
- fulfillment of obligations under applicable laws, regulations, EU legislation or other statutory provisions (eg. recycling requirements)
- exercise by the Controller of his legal rights, for example the right to take court action

B/Subject to your express approval (Privacy Code arts. 23 and 130 and GDPR art. 7), for the following marketing purposes:

- communication by e-mail, post, sms and/or phone-calls, newsletters, of commercial and/or advertising information concerning products and services, together with customer satisfaction surveys
- communication of commercial and/or promotional material by e-mail, post, sms and/or phone-calls

We would point out that, if you are an existing customer, we may send you commercial information about our products and services similar to the information you already receive, unless you expressly decline such information (Privacy Code art. 130 c4)

3. Means of Data Processing

Your personal data shall be subject to the treatment laid out in Privacy Code art. 4 and GDPR art. 4 n. 2, namely: collection, recording, organization, preservation, consultation, elaboration, modification, selection, extraction, comparison, use, interconnection, blocking, communication, cancellation and data destruction. Your personal data shall be subject to processing in paper and electronic and/or automatic format.

The Controller shall use personal data for the time needed to fulfill the purposes indicated above and in any case no longer than 10 years after the cessation of the provision of services and no longer than 2 years after the collection of data for marketing purposes.

4 Data Access

Your personal data may be made accessible for the purposes set out in art. 2 A) and 2 B) of the present Notice:

-to employees and colleagues of the Controller either responsible within the company for data processing and systems administration or to whom such responsibilities have been entrusted

-to third companies or other persons (including credit institutions, professional associates, consultants, insurance companies providing insurance services, etc.) to whom the Controller has outsourced tasks, in their capacity as responsible outside the company for the processing of data

5. Communication of Data

The Controller may, without requiring your express consent (see Privacy Code art. 24, a), b), d) and GDPR art. 6, b)), communicate your data, for the purposes of art. 2A) above, to tax authorities, judicial authorities, insurance companies providing insurance services, as well as to persons with a statutory need to receive such communication for the purpose of the provision of the agreed services. Such persons shall process the data in their capacity as independent data Controllers.

Your data shall not be diffused.

6. Your personal data shall be preserved on a “dedicated” server within the European Union. It is however understood that the Controller may, where necessary, move servers outside the EU. In such a case, the Controller shall already now ensure that the transfer of data outside the EU shall take place in compliance with the applicable legal provisions, using the standard contractual clauses provided by the European Commission.

7. Nature of provision of data and consequences of a refusal to respond

The provision of data for the purposes set out in art. 2A) above is compulsory. Absent such data, we cannot guarantee the provision of services as set out in art. 2 A).

By contrast, the provision of data for the purposes set out in art. 2 B) above is optional. You may therefore decide not to provide any such data or refuse to allow data already provided to be subsequently processed. In such cases you will not be able to receive newsletters, commercial information or advertising material concerning the services offered by the Controller. You will however continue to be entitled to the services pursuant to art. 2 A).

8. Rights of the data provider.

As data provider you shall benefit from the rights enshrined in Privacy Code art, 7 and GDPR art. 15, to wit:

i. to obtain confirmation of the existence of your data, even if not yet registered, and have them communicated to you in intelligible form

ii. to ask for: a/ the origin of your data; b/ how they will be processed and for what purpose; c/ the approach taken to the use of electronic means for data processing; d/ the particulars of the Controller, the responsible persons and representatives designated in Privacy Code art. 5.2 and GDPR art. 3.1; e/ the persons or category of persons to whom personal data may be communicated or who may come to the knowledge of such data in their capacity as appointed country representative, person responsible or entrusted with processing

iii. obtain: a/ the updating, correction or, where deemed useful, completion of the data; b/ the cancellation, transformation into anonymous form or the blocking of data processed in contravention of the law, including those data which do not need to be preserved for the purposes for which they were collected or subsequently processed; c/ an attestation that the operations referred to in a/ and b/ have been notified, along with their content, to the persons to whom the data were communicated or diffused, except in cases where such action avers impossible or would require the use of manifestly disproportionate means with respect to the protected right

iv. to oppose, wholly or in part: a/ for legitimate reasons, the processing of your personal data, even though relevant to the scope of the data collection; b/ the processing of your personal data for the purpose of the sending of advertising material, direct sales or market research or commercial information, by means of automatic call systems without an operator, e-mail or traditional telephone or paper-based marketing techniques. It is pointed out that the right of opposition of the data provider set out in point b/ above, relating to automatic marketing techniques, also extends to traditional techniques and thus the data provider may also only partially oppose the processing of their data. The data provider may thus decide to receive information using only traditional means or only automatic means or neither.

Where applicable, the rights set out in GDPR arts. 16-21 also apply (right to limit processing of data, right to data portability, right of opposition), as well as the right of appeal to the Data Protection Authority.

9. Methods of exercising rights

You may exercise your rights at any time by sending:

- a registered letter to Eredi Caimi SRL – Main Office at Via G. Pascoli 139 – 22057 Olgiate Olona (VA);

- an e-mail to the address: eredicaimisrl@pec.weblink.it

Controller, persons responsible and those entrusted with data processing

The data Controller is Eredi Caimi S.r.l, registered office Via G. Pascoli, 139 – 21057 OLGiate OLONA (VA)

The list of persons responsible for and entrusted with processing of data is preserved at the registered office of the Data Controller.