

The privacy protection of the interested party is the object of great attention by Bruno Balducci srl (hereinafter also the "Company"). The personal data collected are processed in compliance with current national and Community legislation, with particular reference to the 2016/679 European Regulation (hereinafter also referred to as "GDPR").

The Company, as the data controller, undertakes to protect the confidentiality and rights of the Data Subject and, according to the principles established by the aforementioned regulations, the processing of the data provided will be based on principles of correctness, lawfulness and transparency.

1. PURPOSE OF THE TREATMENT

The personal data of the data subjects will be processed by the Company for the following processing purposes:

- a) Contractual obligations (Article 6, paragraph 1, letter b) of the GDPR), or to carry out activities of an organizational, administrative, financial and accounting nature necessary for the fulfillment of contractual and pre-contractual obligations, as well as to implement the conditions general terms and / or conditions of sale of the site, which are accepted by the Interested party during registration to the site; carry out all the activities necessary to offer the sales service to the Interested Party if the latter has proceeded with an online purchase (by way of example and not exhaustive receipt of the order, processing of the same and shipping of products purchased); fulfill specific requests of the interested party and allow him / her to participate in prize operations. Unless the interested party gives the Company a specific and optional consent to the processing of their data for marketing purposes, possibly also by profiling, in accordance with the following paragraphs or for purposes of market surveys, contact details (name, surname, address, e-mail address, land line number, mobile number) will be used by the Company for the sole purpose of ascertaining the identity of the interested party (also by validating the e-mail address), thus avoiding possible scams or abuse, and contact the interested party for reasons of service.
- b) Legal obligations of the owner (Article 6, paragraph 1, letter c) of the GDPR), or to fulfill the obligations established by law, regulation or European legislation. The provision of personal data for the purposes of treatment indicated above is optional but necessary, as failure to provide them will make it impossible for the data subject to register on the site.

The personal data that are necessary for the pursuit of the processing purposes described in this paragraph, letters a) and b) are indicated with an asterisk in the registration form.

- c) Additional processing purposes - marketing, as a result of the free and optional consent of the interested party, some personal data (name, surname, address, e-mail address, landline number, mobile number) may be processed by the Company also for marketing purposes (direct sales, sending of advertising material and commercial communication), or in order for the Company to contact the interested party by telephone (fixed and / or mobile, with automated call or call communication systems with the intervention by an operator) and / or paper mail, electronic mail and / or CD notifications push, via sms, mms and mobile messaging applications, to propose to the Interested products and / or services offered by the same Company and / or by third-party companies, to present offers, promotions and commercial opportunities. The consent to the processing of personal data for this purpose of treatment is free and optional, and in case of lack of consent the possibility to register on the site will not be in any way affected. If consent is also given for such purposes, the interested party may at any time revoke the same, making a request to the Company in the manner indicated in the next paragraph 6. Furthermore, it is possible to revoke consent to treatment by accessing your personal area and modifying the consent settings. The interested party may also object to further sending of promotional communications (via email) by clicking on the appropriate consent revocation link, which is present in each promotional communication. If the User intends to withdraw his consent to the sending of promotional communications, still continuing to receive push notifications, will be able to directly access their personal area or can send a request to the Company in the manner indicated in paragraph 6. In addition, it is possible to revoke the consent to the treatment by accessing your personal area and modifying the settings on consent. The interested party may also oppose only sending promotional communications by clicking on the appropriate link to revoke the consent that is present in each communication sent by e-mail. If the interested party intends to revoke his consent to receive push notifications, he will have to do it directly by accessing the system settings of his smartphone.
- d) Further processing purposes - marketing through profiling, with the free and optional consent of the interested party, the personal data of the interested party (ie both personal and contact data, and information regarding the goods and services purchased) may be processed by the Company also through profiling for marketing purposes, or to reconstruct the tastes and consumption habits

of the interested party, identifying the consumer profile, in order to send the interested party commercial offers consistent with the profile identified. The consent to the processing of personal data for this purpose of treatment is free and optional, and in case of lack of consent the possibility to register on the site will not be in any way affected. Even in the case of consent, the interested party may at any time revoke the same, making a request to the Company in the manner indicated in the next paragraph 6. Furthermore, it is possible to revoke the consent to treatment by accessing your personal area and modifying the settings on the consent .

- e) Additional processing purposes - market research, with the free and optional consent of the interested party, the personal data of the interested party may be processed by the Company for the purposes of analysis and market research, or for the Company to contact the interested party by telephone (fixed and / or mobile, with automated call or call communication systems with the intervention of an operator) to request information from the interested party. The consent to the processing of personal data for this purpose of treatment is free and optional, and in case of lack of consent the possibility to register on the site will not be in any way affected. Even in the case of consent, the interested party may at any time revoke the same, making a request to the Company in the manner indicated in the next paragraph 6. Furthermore, it is possible to revoke the consent to treatment by accessing your personal area and modifying the settings on the consent .
- f) Additional purposes - statistics: the data may also be used by the Company in an anonymous and aggregate form for statistical purposes only.

2. METHOD OF TREATMENT

Data processing is carried out in the following ways:

- Electronic and / or paper, by recording, processing, archiving and transmission of data, also with the aid of IT tools.

The tools and supports used in the course of the processing activities are suitable to guarantee the security and confidentiality of the data.

The custody of databases is carried out in protected environments, whose access is under control and in compliance with the provisions of the law.

In carrying out the processing activities, the Company undertakes to:

- ensure the accuracy and updating of the data processed, and promptly acknowledge any adjustments and / or additions requested by the Data Subject;
- adopt appropriate security measures to guarantee adequate data protection, considering the potential impacts that the treatment involves on the fundamental rights and freedoms of the interested party;
- notify the Interested person, in the times and in the cases provided for by the binding legislation, of any violation of personal data;
- guarantee the compliance of processing operations with the applicable provisions of the law.

3. COMMUNICATION AND DIFFUSION OF DATA

Without prejudice to the communications made in fulfillment of legal obligations, the personal data of the interested party may be known by the data controller, by the persons responsible for whose work the Company uses the outsourcing relationships for the supply of services as well as by the persons in charge of processing exclusively for the purposes listed above according to any consent granted by the interested party.

Personal data are not subject to disclosure.

4. TRANSFER ABROAD

Unless otherwise indicated, personal data will be stored and processed within the European Union.

In any case, the transfer of personal data outside the European Union can only take place after adoption of adequate guarantees, as required by the binding legislation, or in the presence of the consent of the interested party.

5. DATA CONSERVATION POLICY

The Company keeps personal information in its systems, even with automated tools, in a form that allows the identification of data subjects for a period of time not exceeding the achievement of the purposes for which they are processed.

In detail the treatments the following durations:

- the treatments for "contractual obligations" and "legal obligations of the holder" will have a duration equal to that required by the legislation in force;
- treatments for marketing and marketing purposes through profiling will not last more than two years;
- treatments for market research will not last more than two years;
- the data processing provided voluntarily by the Data Subject will be retained until it is deleted by the Data Subject

6. RIGHTS OF THE INTERESTED PARTY

The interested party can assert his rights, recognized by the binding legislation and in particular by the articles. from 15 to 22 of the GDPR, such as:

- Right of access: the right to obtain from the data controller confirmation that personal data is being processed and in this case, to obtain access to personal data and to further information on the origin, purpose, category of data processed , recipients of communication and / or data transfer, etc.
- Right of rectification: right to obtain from the data controller the correction of inaccurate personal data without unjustified delay, as well as the integration of incomplete personal data, also by providing an additional declaration.
- Right to cancellation: right to obtain from the data controller the deletion of personal data without unjustified delay in the event that:
 - o personal data are no longer necessary with respect to the purposes of the processing;
 - o the consent on which the treatment is based is revoked and there is no other legal basis for the treatment;
 - o personal data have been processed unlawfully;
 - o personal data must be deleted to fulfill a legal obligation.
- Right to oppose treatment: the right to object at any time to the processing of personal data that have as their legal basis a legitimate interest of the owner.
- Right to limit processing: the right to obtain from the data controller the limitation of treatment, in cases where the accuracy of personal data is contested (for the period necessary for the data controller to verify the accuracy of such personal data) , if the processing is illegal and the interested party has opposed the processing, if the personal data are necessary for the interested party to ascertain, exercise or defend a right in court, if as a result of the opposition to the treatment the interested party is awaiting verification of the prevalence or otherwise of the legitimate interest of the data controller.
- Data portability right: the right to receive personal data in a structured, commonly and automatically readable format, and to transmit such data to another data controller, only for cases where the processing is based on consent or on a contract and only for data processed by electronic means.
- Right not to be subjected to automated decisions: right to obtain from the data controller not to be subjected to decisions based solely on automated processing, including profiling, which produce legal effects that affect the data subject or that significantly affect him, unless such decisions are necessary for the conclusion or execution of a contract or are based on the consent given by the Interested Party,
- Right to lodge a complaint with a supervisory authority: without prejudice to any other administrative or judicial appeal, the interested party who considers that the treatment concerning him / her is in violation of the GDPR has the right to lodge a complaint with a supervisory authority.

7. DATA CONFERENCE

To exercise their rights, the interested party may contact the data controller at the following references:

2014 TECH SA - Corso San Gottardo, 13 - 6830 Chiasso - Switzerland - Tel: +41 44 58 53 098 - Fax: +41 44 57 53 098 - Email: info@techsa.eu

To the attention of: Privacy Office