# PRIVACY POLICY EX ART 13 OF THE GENERAL DATA PROTECTION REGULATION EU 2016/679 (GDPR) AND EX ART 13 OF THE ITALIAN LEGISLATIVE DECREE n. 196/2003 (PRIVACY CODE)

#### **DATA CONTROLLER**

The Data Controller is Al Boschetto Srl, with registered office in Via delle Batterie 18 - 30013 Cavallino Treporti - Venice - (Italy). "Al Boschetto Srl" (hereinafter referred to as the "Company", "Al Boschetto Srl" or the "Owner") guarantees compliance with the regulations on data protection by providing the following information on the processing of data communicated or otherwise collected during navigation on this site.

### PROCESSED DATA, PURPOSES AND LEGAL BASES FOR PROCESSING DATA

Data generated by access to the site

The computer systems and software procedures used to operate this site acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols. These data (such as domain names, IP addresses, operating system used, type of browser device used to connect) are not accompanied by any additional personal information and are used to:

- 1. obtain anonymous statistical information on the use of the site;
- 2. manage the need to control the way in which the site is used;
- 3. ascertain responsibility in the event of hypothetical computer crimes.

The legal basis that legitimizes the processing of such data is the legitimate interest, arising from the need to make usable the functionality of the site following access by the user.

Data provided voluntarily by the user

The personal data provided by the user through forms are collected and processed for the following purposes:

- a. for the performance of the activities of relationship with the customer, according to the needs of the customer expressed in the data collection forms;
- b. for administrative purposes and for the fulfilment of legal obligations such as those of an accounting or tax purposes, or to comply with requests from the judicial authorities;
- c. in the presence of specific consent, for the periodic sending, by e-mail, of newsletters and advertising material;
- d. in the presence of specific consent, to receive updates on our activities;
- e. in the presence of specific consent, to receive promotional communications and invitations to events, webinars, special promotions or to participate in analysis and market research or last minute communications;

The legal basis that legitimizes the processing is the execution of a contract of which the data subject is a party or the execution of pre-contractual measures taken at the request of him. In the cases expressly indicated, the legal basis is the consent freely given by the data subject.

#### **NATURE OF DATA PROVISION**

Apart from that specified for data navigation and data collected through the Web Platform, the provision of data:

- with respect to the purposes referred to in letters a) and b) is optional but any refusal will make it impossible for Al Boschetto Srl to give effect to the contractual commitments undertaken and / or respond to customer requests expressed through the platform of the forms requested on the site.
- With respect to the purposes referred to in paragraph c), d) and e) is also optional and their use is conditional on the issuance of an explicit consent. Any refusal will make it impossible for Al Boschetto Srl to send newsletters and advertising materials or invitations to events and initiatives of Al Boschetto Srl.

## PROCESSING METHOD AND DATA STORAGE TIMES

The data collected will be processed by electronic or automated, computerized and telematic means, or by manual processing with logic strictly related to the purposes for which the personal data were collected and, in any case, in order to ensure in any case the security of the same. The data are kept for

the time strictly necessary to manage the purposes for which the data are collected in compliance with current regulations and legal obligations. In any case, Al Boschetto Srl practices rules that prevent the storage of data indefinitely and therefore limits the storage time in accordance with the principle of minimization of data processing.

## SUBJECTS AUTHORIZED TO PERSONAL DATA PROCESSING, PROCESSOR AND MOVEMENT OF DATA

Internal staff of Al Boschetto Srl carry out the processing of the data collected for this purpose identified and authorized of the processing according to specific instructions given in compliance with current legislation. The data collected, if necessary or useful to the execution of the above purposes, may be processed by third parties appointed as data processors or, as the case may be, communicated to them as autonomous holders, and precisely:

- 1. persons, companies, associations or professional firms that provide assistance and consultancy to our Company, for the purposes referred to in letter b);
- 2. companies, organizations, associations that provide services related to and instrumental to the execution of the above purposes (service analysis and market research, management of payments by credit card, maintenance of computer systems, credit verification companies).

The personal data will never be disclosed or transmitted to third countries.

#### **RIGHTS OF DATA SUBJECT**

At any time, the data subject may exercise the following rights:

- a. to access to personal data;
- b. to obtain the updating, rectification or integration of incomplete data;
- c. to obtain the cancellation of the data, the transformation into anonymous form of the same or the blocking of data processed in violation of the law;
- d. to obtain certification that any changes or cancellations have been brought to the attention, including as regards their content, of those to whom the data were communicated, except as required by law;
- e. to obtain the limitation of the processing;
- f. to oppose the processing;
- g. data portability;
- h. to revoke consent, where applicable: revocation of consent does not affect the lawfulness of the processing based on the consent given before revocation;
- i. to lodge a complaint with the supervisory authority (Data Protection Authority).

## **COOKIES:**

For information on the use of cookies, please consult the cookie policy: www.alboschetto.it/privacy/cookie-policy

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