

Luigi Zaini S.p.A.

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Information on Personal Data Processing pursuant to EU Reg. 2016/679, articles 13-14

Data Subjects: Customers.

Luigi Zaini S.p.A., being Data Controller of your personal data, pursuant to and for the purposes of EU Regulation 2016/679, hereinafter 'GDPR', hereby informs you that the aforementioned law provides for the protection of Data Subjects regarding personal data processing. This processing will be based on principles of correctness, lawfulness, transparency and protection of your privacy and your rights.

Your personal data will be processed in accordance with the legislative provisions of the aforementioned law and confidentiality obligations therein provided for.

Purpose and legal basis of the processing: in particular, your data will be processed for the following purposes related to implementation of fulfilments of legislative obligations:

- Obligations mandatory by law in tax and accounting areas;
- Applicable obligations under laws in force.

Your data will also be used for the following purposes related to the execution of proceedings linked to contractual or pre-contractual obligations:

- Post-sales assistance;
- Relationships management during sales operations;
- Customer management;
- Quality management;
- Activities planning;
- Customer satisfaction survey;
- Customer billing history.

Your data will also be used for the following purposes necessary to pursue the Data Controller's legitimate interest:

- Litigation management;
- Possible execution of market surveys, statistics and promotional activities involving also mailing of advertising and promotional material.

Processing methods. Your personal data may be processed in the following ways:

- By electronic devices using software systems directly managed or programmed;
- Outsourced processing operations;
- Creation of profiles related to customers, suppliers or consumers;
- Computer-based processing;
- Manual processing by means of paper archives.

Each processing is performed in compliance with the procedures set out in GDPR articles 6, 32 and by adoption of the provided appropriate security measures.

Only personnel explicitly authorized by the Data Controller will process your data. In particular, the following categories of employees:

- Store attendants;
- Administration office;
- Commercial office;
- Marketing office.

Communication: Your data may be disclosed to external parties for a correct relationship management and, in particular, to the following categories of Recipients, including all Data Processors duly appointed:

- Banks and credit institutions;
- Consultants and freelance professionals, even in associated form;
- Freight forwarders, carriers, small carriers, postal services, logistics companies.

Propagation: Your personal data will not be circulated in any way.

Retention Period. We inform you that, in compliance with principles of lawfulness, purposes limitation and data minimization, in accordance with GDPR article 5, retention period for your personal data is:

- The time necessary to fulfil contractual purposes and, afterwards, the time necessary to protect the Data Controller's legitimate interest to ascertain, exercise or defend a right in a judicial context;
- Established for a period not exceeding the achievement of the purposes they are collected and processed for, and in compliance with the mandatory time limits prescribed by law.

Data Controller: pursuant to the Law, Data Controller is Luigi Zaini S.p.A. (via Carlo Imbonati 59, 20159 Milan MI; VAT no. 00868710153) in the person of its pro tempore legal representative.

From the Data Controller you have the right to obtain cancellation ('right to oblivion'), limitation, update, rectification, portability, opposition to processing of personal data concerning you. Besides, in general you can exercise all the rights provided by GDPR articles 15, 16, 17, 18, 19, 20, 21, 22.

EU Reg. 2016/679 - Articles 15, 16, 17, 18, 19, 20, 21, 22 – Data Subject's Rights

1. Data Subject has the right to obtain confirmation on whether related personal data exist or not (even if not recorded yet), their communication in an intelligible format and the possibility to make a complaint with the Control Authority.

2. Data Subject has the right to obtain indication of:

- a. Personal data origin;
- b. Processing purposes and methods;
- c. Logic applied in case of processing performed by means of electronic devices;
- d. Identification details of Data Controller, Data Processors and Representative appointed pursuant to article 5, paragraph 2;
- e. Subjects or subjects categories whom personal data may be communicated to or who possibly become aware of, being Designated Representative in the State territory, Data Processors or authorized persons.

3. Data Subject has the right to obtain:

- a. Update, rectification or, if interested, integration of data;
- b. Cancellation, anonymization or block of data processed in violation of the law, including data whose conservation is not necessary in relation to the purposes of their collection or subsequent processing;
- c. Attestation that recipients, whom data have been communicated or propagated to, have been made aware of actions quoted in points a) and b) above, even regarding the content of such actions, except in the case where fulfilment of this obligation is impossible or implies the use of means clearly disproportionate to the protected right;
- d. Data portability.

4. Data Subject has the right to object, in whole or in part:

- a. For legitimate reasons, to processing of related personal data, even if relevant to the purpose of their collection;
- b. To processing of related personal data for the purpose of sending advertising material or direct sale or market surveys or commercial communications.