

## **INFORMATIONAL REQUEST PRIVACY POLICY**

### **Pursuant to Art.13 EU Regulation 2016/679**

Data collected from the Data Subject

#### **Dear Customer,**

The following privacy policy is provided in accordance with Art. 13 of the EU Privacy Regulation (2016/679) and is intended to provide you the following information, necessary to ensure ethical and transparent data processing.

The Data Controller is ROCCA DEL CASTELLARO SPA, with registered office at Via N. Cuneo 34, Camogli (GE), VAT Number 00249730102, Phone +39 01857241.

#### **Nature of the Data Collected**

Personal data collected essentially include:

- Identifiers (e.g. first name, surname, home address, telephone number, email address, tax ID number, VAT number)
- Economic/financial data (e.g. orders, credit-worthiness, bank and financial data, accounting and tax-related data, etc.)

#### **Processing Purposes and Legal Basis**

Processing of personal data submitted shall be limited to:

1. Fielding and properly processing your request.  
The legal basis for processing is contract performance and statutory/regulatory compliance.
2. To send promotional messages, newsletters, and updates on prices/promotions.
  - a. Notices relating to marketing and advertising on events, programmes, or partnerships instituted by our company, which shall be sent via email, text message, or “push” notification;
  - b. Statistics and reporting relating to advertising systems, including tracking the number of emails actually opened, click-throughs on links in the body of the message, the type of device and operating system used to read the message, and the number of persons unsubscribed from the newsletter.

The legal basis for processing is consent.

#### **Recipients, or Categories of Recipients of Personal Data**

Your personal data may be disclosed (only insofar as required by the purposes listed *supra*) to the following categories of entities:

- Companies that manage post services, IT consulting, organisational, administrative, and tax accounting services, credit-collection companies, insurance companies, and couriers.
- Banking institutions, to manage deposits and payments;
- Financial agencies and other public companies or agencies, to comply with regulatory duties
- Law firms, to safeguard contractual rights

**Data Retention Period**

Data submitted by you for the purposes listed in point 1 hereof shall be retained for the period necessary to process your request, after which time they shall be erased and deleted from our archives.

Data supplied by you for the purposes listed in point 2 hereof shall be retained for twenty-four (24) months, after which they shall be erased and deleted from our archives.

**Rights of the Data Subject**

As a data subject, you have the right to demand access to your personal data from the Data Controller, as well as the right to have such data corrected or erased, or to limit processing on the same, or to object to any processing; you can also request data portability if and when your circumstances so require.

To make it all the easier to exercise your rights, we have set up a designated email inbox [privacy@cenobio.it](mailto:privacy@cenobio.it). Before we can provide you information or change any information, it may be necessary to have you verify your identity and answer a few questions. We will reply as quickly as possible.

**Rights of Appeal**

If you believe your rights have been infringed upon, you can lodge a complaint with the Data Protection Authority using the forms available on their website [www.garanteprivacy.it](http://www.garanteprivacy.it).

**Consent Revocation**

You have the right at any time to revoke your consent to personal data processing. Please send any such request to [privacy@cenobio.it](mailto:privacy@cenobio.it)

In such instances, we may need to verify your identify and have you answer a few questions.

Such revocation shall not effect the lawfulness of any processing performed prior to the revocation.

**Mandatory Nature of Data Submission / Consequences of Withholding Consent**

Data submission is mandatory as to the purposes listed in point 1 hereof; any refusal to submit such data shall make it impossible to execute the contract.

In terms of the purposes listed in point 2, supra, your consent is optional. If you do not provide your data for such purposes, you will not be able to receive advertising on our products and services, but it will have no effect on the contract itself.

Date,  
acknowledgement whereof

Data subject(s) signature(s) in

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## CONSENT FROM THE DATA SUBJECT

The undersigned \_\_\_\_\_  
born in \_\_\_\_\_

### Affirms

They have reviewed the privacy policy provided by ROCCA DEL CASTELLARO SPA, and provide their consent to the processing of their own personal data for the purpose of sending advertising, newsletters, and updates on prices and promotions

I consent

I do not consent

Date,

Data Subject signature

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