

Privacy Policy for Client Data Processing

We wish to inform you that, pursuant to Article 13 of Legislative Decree 196/2003 (Privacy Code) and Article 13 of EU Regulation 2016/679 (General Data Protection Regulation – hereinafter "GDPR 2016/679"), which provide for the protection of individuals and other entities with regard to personal data processing, the personal data provided will be processed by our company. The processing of personal data by the company will comply with the aforementioned regulations, adhering to principles of lawfulness, fairness, transparency, and protection of confidentiality and rights, with particular regard to integrity, confidentiality, personal identity, and the right to personal data protection.

1. Data Controller

The Data Controller is BONACINA1889 S.R.L., with its registered office in Lurago d'Erba (CO), Via S. Primo 19, 22040. The email address for contacting the Data Controller is: *amministrazione@bonacina1889.it*

2. Types of Data Collected

Providing personal data is necessary for the establishment of contracts, their amendments, and any other relationship with the company. The personal data collected include:

- a) Client personal data, legal representatives, or company contacts;
- b) Contact details (e.g., phone number, email address) of the client, legal representative, or company contacts;
- c) Shipping data (e.g., address) for individual clients.

3. Purpose of Data Processing

The personal data provided will be used for the following purposes:

- a) To comply with legal, regulatory, EU, and civil/fiscal obligations;
- b) To provide the requested services, fulfill contractual obligations, and manage the relationship effectively, responding to requests for information, assistance, suggestions, and needs indicated by you;
- c) To carry out commercial/promotional information activities, and send newsletters via email to the address provided during the sale or acquaintance phase, concerning products and/or services similar to those negotiated (Soft Spam).

4. Nature of Data Provision and Legal Basis for Processing

Providing personal data is necessary for the execution of a contract with the counterparty. Failure to provide such data will prevent the complete delivery of the offered services or hinder the continuation of ongoing relationships.

Providing data described in point "c" of section 3 is voluntary and necessary to pursue the legitimate interest of the Data Controller. You have the right to object or unsubscribe from data processing at any time by using the link included in every electronic communication received. Objection to such emails will not affect the contract.

5. Processing Methods

Processing will be carried out both automatically and manually, using methods and tools that comply with the security measures specified in Article 32 of GDPR 2016/679. It will be conducted by authorized personnel, in compliance with Article 29 of GDPR 2016/679. Security measures will ensure the confidentiality of the subject to whom the data pertains and prevent unauthorized access by third parties or unauthorized personnel.

6. Data Retention

In compliance with the principles of lawfulness, purpose limitation, and data minimization (as per Article 5 of GDPR 2016/679), the retention period for personal data is determined not to exceed the time necessary to achieve the purposes for which it was collected and processed (typically 10 years), while adhering to legally prescribed timeframes. At the end of the retention period, personal data will be deleted. Consequently, after this period, the rights of access, deletion, rectification, and data portability can no longer be exercised.

7. Data Communication and Dissemination

The collected data will not be disseminated; however, they may be communicated, for the purposes mentioned above, to the following categories of recipients:

- Public entities to which data must be communicated by law (e.g., social security and welfare institutions, financial offices);
- Public or private entities where communication is necessary or functional to the performance of our business activities;
- Consultants, within the limits necessary for them to perform their professional tasks on behalf of our company.

8. Data Transfer to Non-EU Countries

The Data Controller does not transfer personal data to non-EU countries. However, the possibility of using cloud services is reserved, in which case the service providers will be selected among those providing adequate guarantees as required by Article 46 of GDPR 2016/679.

9. Data Subject's Rights

At any time, you may exercise the following rights with the Data Controller, pursuant to Article 7 of the Privacy Code and Articles 15-22 of GDPR 2016/679:

- Request confirmation of the existence of personal data concerning you;
- Obtain information about the purposes of processing, categories of personal data, recipients or categories of recipients to whom personal data have been or will be disclosed, and, when possible, the retention period;
- Obtain the rectification and deletion of data;
- Obtain the restriction of processing;
- Obtain data portability, i.e., receive the data from the Data Controller in a structured, commonly used, and machine-readable format and transmit them to another Data Controller without hindrance;
- Object to processing at any time, including for direct marketing purposes;
- Object to automated individual decision-making, including profiling;
- File a complaint with the supervisory authority (Privacy Guarantor).

10. Additional Information Not Included in This Policy

Further information regarding the processing of Personal Data may be requested at any time from the Data Controller using the contact details provided.