

PRIVACY NOTICE PURSUANT TO ARTICLE 13 OF REGULATION (EU) 2016/679

Data Controller

For the purposes of Article 13 of the EU Regulation 2016/679 (GDPR), **Polo Cosmesi**, with its legal headquarters situated on Via Libero Comune, 12, 26013 Crema (CR), is the **Data Controller**.

We inform you that data provided in relation to existing legal relationships (user/interested party) will be treated in compliance with the aforementioned legislation. The treatment of personal data will take place lawfully and according to the principles set out in art. 5 of the 2016/679 EU Regulation. Further communication may be disclosed at a later time and may even be disclosed verbally. The person responsible for the protection of personal data has not been appointed.

Data subject to processing

Art. 4 of EU Regulation 2016/679 defines "personal data" as any information concerning an identified or identifiable individual ("interested party"); the natural person who can be identified, directly or indirectly, with particular reference to an identifier such as a name, an identification number, location data, an online identifier or one or more characteristic elements of his physical identity, is considered identifiable, including through physiological, genetic, psychic, economic, cultural or social elements. The processing of your personal data is carried out by means of the procedures as mentioned in Article 4, n. 2 of the GDPR, namely: the collection, recording, organization, structuring, retention, adaptation or modification, extraction, consultation, use, communication by transmission, dissemination or any other form of making such data available, comparison, limitation, erasure or destruction of data. Specifically, this is data you have voluntarily provided for the execution of existing legal relationships with the Data Controller of personal data:

- Data relating to identified or identifiable persons: name and surname, contact details such as residential address, postal code, city, province/state, telephone, email etc.;
- Data relating to the names of Freelancers/Companies /commercial activities: data relating to economic and commercial activities; name, address for tax purposes, or other identification elements (company name, registered office address, operational headquarters address, telephone, fax or e-mail number, tax code or VAT number).

To this are added the navigation data, the IT systems, and the software procedures used to operate this website, which could acquire your personal data during their normal operation, the transmission of which is implicit in the use of Internet communication protocols. This is information that is not collected with the purpose of being associated with identified/identifiable interested parties, however by their very nature could, through processing and association with data held by third parties, allow users to be identified. This category of data includes the IP addresses or domain names of the computers used by users who connect to the site, the addresses in the Uniform Resource Identifier (URI) notation of the requested resources, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the operating system and the user's computer system and environment. This data is used only to obtain anonymous statistical information regarding use of the site and to check its correct functioning and is deleted immediately after processing. The data could be used to ascertain responsibility in the event of hypothetical computer crimes against the site or requests from the authorities.

Purpose of data processing

Subject to your specific consent, the purposes of the processing of your personal data are as follows:

1. management of existing and/or future legal relationships;
2. the fulfilment of obligations deriving from the aforementioned legal relationships;
3. organizational management of any legal relationship in place or in the phase of being defined;
4. acquittal of legal, accounting and/or tax obligations;
5. protection of contractual rights;
6. functional purposes for carrying out statistical analyses.

Retention time

Personal Data related to purposes 1, 2, 3, 4, 5 and 6 shall be processed and stored for as long as required by the purpose they have been collected for to allow for the carrying out/execution of services offered by the Data Controller and for a maximum of ten (10) years. After this time period has lapsed, all data will be destroyed. Data processed for administrative and accounting purposes will in any case be kept, in compliance with legal obligations, for a period of time not exceeding 10 (ten) years. You can withdraw your consent to this processing at any time.

Nature of data provision

The consent to the processing of data is mandatory in relation to purposes 1 - 6, to fulfill legal obligations regarding an established relationship and for any other purpose connected to legal obligations, regulations and community regulations; the refusal to communicate the data will prevent the Data Controller from fulfilling these obligations and consequently the Data Controller will be unable to provide the services and/or services you have requested. The interested party may at any time exercise the rights referred to in art. 7, par. 3, and art. 15 and ss. of EU Regulation 2016/679, that is, the termination of such communications, also expressing the desire to receive communications exclusively through other contact methods, where provided.

Methods of data processing

The data will be processed and archived exclusively for the purposes indicated above through the use of both paper and electronic media, inserted in relevant databases and processed with suitable tools to guarantee the integrity, security and confidentiality of the data, in compliance with the provisions of EU Regulation 2016/679. All appropriate technical and organizational measures will be adopted to guarantee a level of data protection compliant with the provisions of EU Regulation 2016/679. Access will only be allowed to persons authorized in writing to process personal data. The data may also be communicated to and/or collected by third parties (as in the case of data acquisition from processing centers or other companies). Such third parties will be appropriately designated as *Responsible* for the processing of personal data and will be involved in and subject to the obligations required by the legal relationship in place, as well as by specific legal obligations.

Social media platforms

The website may offer access to so-called *Social Media* services and platforms. Xxx SpA recommends that caution be exercised regarding the dissemination of personal information on channels through "comments" or "public posts" while using the aforementioned platforms. The terms of use and the privacy policies applicable to each of these means of social communication, published on their respective sites, govern the information provided. Polo Cosmesi does not perform any form of checking or monitoring on the use of personal information communicated in a public forum, a comment area, or a message board or wall, making the user solely responsible for any disclosure.

Cookies

Pursuant to the provision of the Data Protection Authority 8 May 2014, n. 229, two macro-categories of cookies are identified: "Technical" and "Profiling".

Technical Cookies

Technical cookies are used for the sole purpose of transmitting a communication over an electronic communications network, or to the extent as strictly necessary to provide a service explicitly requested by the user. They are not used for other purposes and are normally installed directly by the owner or manager of the website. They can be divided into (i) *navigation or session cookies*, which guarantee the normal navigation and use of the website (allowing, for example, to make a purchase or authenticate to access restricted areas); (ii) *analytics cookies*, similar to technical cookies when used directly by the site operator to collect information, in aggregate form, on the number of users and how they visit the site; (iii) *functionality cookies*, which allow the user to navigate according to a series of selected criteria (for example, the language, the products selected for purchase) in order to improve the service provided. For the installation of these cookies, the prior consent of users is not required, while the obligation to provide the information referred to in art. 13 of the 2016/679 EU Regulation is however mandatory.

Profiling Cookies

Profiling cookies are aimed at creating profiles relating to the user and are used in order to send advertising messages in line with the preferences expressed by the user while surfing the net. Due to the particular invasiveness that such devices may have in the private sphere of users, the user must be adequately informed about their use and thus express their valid consent.

Each domain, or portion of a domain, which is visited with the browser can set cookies. Since a typical Internet page, for example that of a newspaper on the net, contains objects that come from many different domains and each of them can set cookies, it is normal to host many hundreds of cookies in your browser. The purpose is to register, but also, sometimes, to track information relating to the user experience, moving from one page of the site to another while keeping the user authenticated, to save user preferences already entered (username, password, etc.), track the tastes and preferences of the user allowing for the management of the presence or absence of targeted marketing initiatives. If restrictions are placed on their use, this will have an effect on the user's status and experience when viewing the site. Blocking or removing them from the browser cache could cause incomplete use of the services offered by the web application.

Communication to third parties and/or data dissemination

For the purposes referred to in numbers 1 to 6, the Data Controller informs you that your data may be communicated to external parties, designated in writing, if this is necessary to fulfill an obligation established by law, to perform obligations deriving from a contract to which you are/will be a party, as well as to fulfill your specific requests before the conclusion of the contract.

The recipients of the communication of the interested party's personal data can also be identified in the following categories of recipients:

- Supervisory bodies, judicial authorities, entities, professionals, companies, public administrations or other structures designated for the execution of any task related to the fulfillment of the administrative, accounting and management obligations linked to the Data Controller's normal economic activities - (legal obligations);

- banks, financial institutions, freelancers, professional firms, and consultants to whom the communication of the aforementioned data is necessary for the performance of the activity of the Data Controller and, in particular, in relation to the fulfillment of the contractual obligations assumed towards the interested party - (contractual obligations);
- The data collected will not be disclosed in any way.

Intention to transfer data abroad

The data will be transmitted exclusively in Italy and within the European Union.

User Rights under EU Regulation 2016/679

Users may exercise, at any time, their rights referred to in art. 7, par. 3, and art. 15 and ss. of EU Regulation 2016/679:

- A) **the right to access their data;**
- B) **the right to verify and seek rectification or cancellation/removal of their data or limitation of data processing;**
- C) **the right to object to processing of their data;**
- D) **the right to receive their data and have it transferred to another controller;**
- E) **the right to withdraw their consent at any time where provided (the withdrawal of consent does not affect the lawfulness of the processing based on the consent given before the withdrawal);**
- F) **the right to lodge a complaint against the Data Controller (Users have the right to bring a claim before their competent data protection authority).**

The aforementioned rights may be exercised by sending a communication to **Polo Cosmesi**, with registered legal office on Via Libero Comune, 12, 26013 Crema (CR), by calling (+39) 346-2646367 or by e-mail at the address info@polocosmesi.com

The interested party declares to have been informed about the rights provided for by art. 7, par. 3, and by arts. 15 et seq. Further information relating to the processing of personal data may also be communicated verbally at the time of data collection.