

DISCLOSURE ON THE PROCESSING OF PERSONAL DATA OF THE WEBSITE

www.venetacassetti.com

Arts. 13-14 Regulation (EU) 2016/679

Document created on: 10 June 2022

WEBSITE DISCLOSURE FORM 2

For any clarification or information, or to exercise the rights listed in this disclosure, please write to:

info@venetacassetti.com

The data subject is invited to indicate: “*Istanza Privacy Site Web*” (*Website privacy request*) in the subject field

The following disclosure may be subject to amendments following the introduction of new laws or changes to the website.
We therefore invite you to periodically check this section for updates.

GENERAL INFORMATION ON REGULATION (EU) 2016/679. Regulation (EU) no. 679 of 2016 defines the rules for protecting and safeguarding natural persons with regard to the processing of their personal data. This privacy disclosure refers solely to the website indicated in the header. Third-party websites that may be accessed via this site are not covered by this disclosure: the Data Controller declines any responsibility in relation to these. According to the law, the processing of personal data is governed by the principles of lawfulness, correctness, transparency, restriction of scope, data minimisation, accuracy, limitation of retention, integrity, confidentiality of the data subject and the safeguarding of the latter's rights: the Data Controller undertakes to observe these principles and, to this aim, hereby informs the data subject that – with the exception of processing for which the law requires an explicit consent – the data subject, by browsing this website, uploading and providing personal data, accepts and consents to be bound by the conditions and terms of this disclosure.

DATA CONTROLLER - Art. 24 of the GDPR. The Data Controller (or, simply, the Controller) is the natural or legal person, public authority, agency or other body that, individually or together with other parties, determines the purposes and methods of the personal data processing. In addition, it is the party that deals with security profiles. With regard to the processing of the data subject's personal data performed through this website, the data Controller is:

VENETA CASSETTI S.R.L.

Via Veneto 19

31040 Gorgo al Monticano (TV) - Italy

VAT No. 02483790263

E-mail: info@venetacassetti.com

For any clarification or to exercise the rights available to the data subject, please contact the addresses indicated above.

DATA SUBJECT - Art. 4, Par. 1 letter a) of the GDPR. The “data subject” is an identified or identifiable natural person to whom the personal data refers. In short, it is the subject who provides his/her personal data to the Data Controller and who, as a result, is safeguarded and protected by the aforementioned European regulation. For the purpose of this website, the data subject is the user, namely the natural person, who performs the navigation activities.

PERSONAL DATA OF MINORS UNDER 14 YEARS OF AGE. This website does not offer direct services to natural persons younger than 14 years of age. The Data Controller is not responsible for collecting data from such parties, as this responsibility lies with the holders of parental responsibility, for lack of monitoring. Nevertheless, if the Data Controller believes that data inadvertently collected refers to natural persons under 14 years of age, it will immediately destroy said data.

PURPOSES OF THE DATA PROCESSING AND CATEGORIES OF DATA PROCESSED - Art. 13, Par. 1 letter c) of the GDPR. In processing the data, besides navigation data, the Data Controller only uses the data strictly required, which is indicated with an asterisk (*) in the relative fields to be filled out on the website. The data provided is used solely and exclusively for the purposes indicated in the following points (for example: data provided to request information on the Data Controller's activities will only be used to respond to the request and not for other purposes, unless the Data Subject consents to this or if it is in the legitimate interests of the Data Controller to use the data for other purposes).

The reasons for which the Data Controller processes the user's personal data are listed below, on the basis of the relevant purposes.

(1) To allow the user to navigate in the website.

Identification data will not be collected through mere browsing activities. Nevertheless, for the purposes of the website's normal operation, the IT system may acquire some information, the transmission of which is implicit in Internet communication protocols [e.g. log files, Internet Protocol (IP) address]. Furthermore, information that the user does not provide directly will be collected by means of cookies. While this is data is not collected for the purpose of associating it with identified data subjects, given its nature, it may nonetheless allow third parties to identify the user through processing activities and associations with other data already in their possession. *Cookie disclosure.* Information on cookies and on automated systems similar to cookies are available to the user by clicking on the link "COOKIE POLICY" present on the website (consult the cookie disclosure at the end of this document).

(2) To fulfil requests for information. The website includes the Data Controller's contact information (e-mail address, head office, telephone number, other useful data). The user who uses this contact information to collect information on the Data Controller's activities provides the latter with his/her personal data (e.g. name, surname, personal information), which will be processed exclusively for responding to requests for clarifications, answering queries, and so forth.

(3) To fulfil legal obligations.

The data provided by the data subject will be used to fulfil legal obligations envisaged in the Italian, European or supranational legislation.

(4) To ascertain, exercise or defend rights.

The data provided by the data subject will be processed, where necessary, also for ascertaining, exercising or defending the Data Controller's rights in both judicial and extra-judicial fora.

(5) To send advertising communications (in the form of "direct marketing" or "newsletters").

The following information will be applied whenever, during navigation on this website, the user is invited to provide his/her personal data and consent for receiving communications involving advertising material or commercial communications, offers and promotions, direct sales communications, or for completing market surveys or opinion polls (hereinafter referred to globally as "direct marketing" activities or "newsletters"). The purpose of the data processing is to perform "direct marketing" activities towards the user.

(6) To respond to requests for information submitted by the user through the contact form. The user's data (name, e-mail address, telephone number, other) provided when filling in the above-mentioned form will be processed by the Data Controller for responding to the request for information submitted by the user.

LEGAL BASIS - Art. 13, Par. 1 letter c) of the GDPR. The above numerical order applies.

(1) depending on the cases, the legal basis could consist in the consent provided pursuant to Art. 6, Par. 1, letter a) of the GDPR or Art. 22 of the GDPR (see Privacy Disclosure) or in the legal obligations and/or legitimate interests of third parties (Art. 6, Par. 1 letters c) and f) of the GDPR) (see "Data processing by police forces for law enforcement purposes").

(2) The legal basis consists in the execution of pre-contractual or contractual measures adopted on the data subject's request [Art. 6, Par. 1 letter b) of the GDPR].

(3) The legal basis of this processing consists in the fulfilment of a legal obligation to which the Data Controller is subject [Art. 6, Par. 1 letter c) of the GDPR].

(4) The legal basis of the data processing is the Data Controller's legitimate interest [Art. 6, Par. 1 letter f) of the GDPR]. If any controversy/dispute/claim should arise between the data subject and the Data Controller, the latter shall be entitled to process the data subject's data for asserting its claims.

(5) The legal basis consists in:

i) the data subject's consent (optional) pursuant to Art. 6, Par. 1 letter a) of the GDPR;

ii) in Art. 130, Par. 4 of the new Privacy Code, but only in the event of data processed via electronic mail and for sending communications relevant to services similar to those already "sold" to the customer;

iii) in legitimate interest pursuant to Art. 6, Par. 1 letter f) (in combination with Art. 47 of the GDPR), when the data subject expects this processing by the Data Controller and this does not damage his/her rights and freedoms.

(6) The legal basis consists in the execution of pre-contractual or contractual measures adopted on the data subject's request [Art. 6, Par. 1 letter b) of the GDPR].

DATA RETENTION PERIOD - Art. 13, Par. 2 letter a) of the GDPR. The above numerical order applies.

(1) Without prejudice to that mentioned below regarding cookies or similar tools, the Data Controller does not retain any personal data potentially provided through mere browsing activities.

(2) The Data Subject's data will be stored for the time required for implementation of the service for issue of information: after this time, the data will be deleted immediately. PLEASE NOTE: the data subject's data will not be deleted but managed correctly pursuant to the GDPR if the contract is stipulated (this cannot be done via the website). For all information concerning this data processing, please refer to the relevant privacy disclosure.

(3) The retention period depends on the law applied by the Data Controller upon processing.

(4) The Data Controller shall retain the data subject's data for this aim only if there is a reasonable probability of legal action.

(5) With reference to this aspect:

i) If consent is given, the data shall be retained for this purpose until withdrawal of consent as per Art. 7 of the GDPR. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal;

ii) - iii) if processing was carried out pursuant to Art. 130, Par. 4 of the new Privacy Code and Art. 6, Par. 1 letter f), the data shall be retained for these purposes until the opposition pursuant to Art. 21 of the GDPR by the data subject, to be asserted since the beginning of the processing or during its protraction.

(6) as per point 2).

MANDATORY NATURE OF THE DATA CONFERRAL

CONSEQUENCES IN CASE OF NON-CONFERRAL

PROCESSING METHODS - Art. 13, Par. 2 letter e) of the GDPR. The above numerical order applies.

(1) The data subject is not obliged to provide his/her personal data. The non-conferral of data does not allow navigation. Data processing carried out exclusively through computerised systems (software).

(2) The data subject is not compelled to provide personal data. Non-conferral does not allow the user to receive the requested information. Data processing carried out via e-mail, telephone, postal mail.

(3) The system depends on the legal obligations; in actual fact, it is the law that specifies the data processing methods (as in the case, for example, of electronic invoicing).

(4) Data processed through computerised systems (for example: e-mails, certified electronic mail, IT platforms, management systems, other) and hard-copy systems (for example: judicial documents, injunctions, document printouts, printed mail, other). Sometimes the system depends on the legal obligations [see "on-line civil trial" (PCT)].

(5) Personal data conferral is not mandatory. If the data subject refuses to provide personal data for receiving marketing communications, he/she will not be able to obtain further information on the products and services supplied by the Data Controller or other subject. Regarding the processing methods, communications relating to "direct marketing" are carried out through automated systems (e.g. e-mail, fax, SMS, telephone calls without the aid of an operator, social networks, interactive applications, push notifications) and traditional systems (e.g. postal mail and/or telephone calls with an operator). It is worth noting that consent collected for data processing through "automated systems" legitimises the Data Controller to use the same data also for sending communications via traditional systems. Nonetheless, the data subject has the right to oppose the undesired processing method (e.g. by expressing his/her preference for receiving communications only via e-mail). If data is processed by sending communications through a telephone operator, this method cannot be applied if the data subject is registered with the Do Not Call Registry.

(6) The data subject is not compelled to provide personal data. Non-conferral of data in this case will prevent the user from receiving the requested information. Data is processed using computerised systems.

DIFFUSION AND COMMUNICATION OF DATA - Art. 13, Par. 2 letter e) of the GDPR. The data will not be diffused but communicated to subjects formally appointed as operators (e.g. employees, where relevant) or designated as data processors (e.g. the company providing the hosting service). In order to fulfil legal or contractual obligations, the data subject's data may be communicated to the following subjects:

(i) insurance companies in the event of accidents;

(ii) public bodies where required by law;

(iii) solicitors, police forces, the judicial authority (for example) in case of unlawful conduct, contractual non-fulfilment, other juridically relevant facts caused by the data subject or by the Data Controller towards the data subject. For further information on the designated subjects or on the data processors, contact the Data Controller at the e-mail address given in the header.

PLACE OF DATA PROCESSING AND TRANSFER OF DATA TO NON-EU COUNTRIES - Art. 13, Par. 1 letter

¶ The data is processed at the registered office of the Data Controller and at the workplaces of the subjects designated as data processors. The Data Controller undertakes not to transfer data to countries outside the EU. Should this occur, the Data Controller guarantees the application of the rules stated under Arts. 44 and subsequent of the GDPR. For any information, write to the e-mail address mentioned above.

RIGHTS OF THE DATA SUBJECT. The data subject is entitled to request from the Data Controller access to his/her personal data and to know which data the latter processes (Art. 15 of the GDPR); to obtain the correction of the data, or its modification if it has changed (Art. 16 of the GDPR); to restrict processing of data concerning him/her, or limit the use of said data by the Data Controller (Art. 18 of the GDPR); to oppose, on legitimate grounds, the data processing (Art. 21 of the GDPR); to obtain data portability or to receive all personal data processed by the Data Controller in a structured format legible on computerised supports (Art. 20 of the GDPR); to request the erasure of his/her data by the Data Controller (Art. 17 of the GDPR); to withdraw at any time the explicit consent previously given, without any effect on the lawfulness of the data processing carried out up to that time (Arts. 7-13 of the GDPR); to submit a claim with the Italian Data Protection Authority in case of breaches to the regulation (Art. 77 of the GDPR).

COOKIE DISCLOSURE. Information on cookies and automatic systems similar to cookies are available to the user by clicking on the link “COOKIE POLICY” present on the website’s footer. For reasons of completeness, the Data Controller provides the Cookie Policy at the end of this privacy disclosure.

For any information and clarification, or to exercise the relevant rights, contact the Data Controller at the above-mentioned e-mail address.