

**Subject: Information on the processing of personal data, pursuant to Article 13, EU Regulation No. 2016/679 - "GENERAL DATA PROTECTION REGULATION" (hereinafter "GDPR") and Legislative Decree No. 196/2003, supplemented by Legislative Decree No. 101/2018.**

With this information notice, we would like to inform you of the manner in which the companies L"ASTEMIA and TENUTE DEL VINO (hereinafter also collectively referred to as the Companies or Joint Owners) process your personal data, which you have communicated to us on the occasion of a contact with our Company.

Where not specified, all articles of law cited in this document refer to the GDPR.

#### **1) Data controller**

Joint data controllers are the companies

- L"ASTEMIA S.R.L., with registered office in Via Crosia 40 in Barolo (CN - 12069) and VAT no.: 03203200047
- TENUTE DEL VINO S.R.L., with registered office in Via Alba, 26 in Barolo (CN - 12069) and VAT no.: 02929850044, who have signed a co-ownership agreement.

#### **2) Appointment of DPO**

Since the co-owners do not fall under the cases indicated in Art. 37 of the GDPR, nor under those indicated in the various interpretations of the Data Protection Authority, they did not consider it necessary to appoint a Data Protection Officer.

#### **3) Subject of the processing**

We would like to emphasise that the legislation in question only concerns personal data, i.e. only data that can be traced back to NATURAL persons (Art. 2, para. 1 and Art. 4, para. 1), and not to legal persons.

The processing concerns names, surnames, telephone numbers, e-mail addresses, tasks and roles within your company, acquired:

1. through your business card (personal or representing a company in any capacity whatsoever), or in any case through contact with our sales staff;
2. through public directories, available on the web, to which you have autonomously provided your data, for the purpose of business contact;
3. through any directories issued at events in which the Companies have participated, containing your data only if you have consented to this processing at each event.
4. through lists and forms filled in at events organised by the Companies: workshops, training activities, company courses, forums, seminars, etc.
5. through content sharing forms and/or feedback requests for events, publications or other activities organised or promoted by the Companies (typically just the e-mail address)

#### **4) Purpose of the processing, legal basis, nature of the provision**

The personal data referred to in points 3.1, 3.2, 3.3 and 3.4 is acquired as part of the Companies' normal commercial and relational activities, and is used for the purpose of responding to any customer/user requests. The data referred to in point 3.5 is collected for the purpose of correctly managing the activities for which they were collected and for direct marketing activities, which, however, are not subject to the request for consent, as they fall within the case of the overriding legitimate interest of the data controller (Art. 6, paragraph 1, letter f.)

If the data subject explicitly and voluntarily consents to this purpose, pursuant to Art. 6 paragraph 1 letter a) of the Regulation, this data may also be used for generic, institutional or promotional marketing activities.

If the data subject disagrees with the processing activities carried out by the Companies, he/she may in any case object by exercising his/her rights, including restriction of processing and blocking of consent, as referred to in point 9 of this document, through the means provided for in point 10 of this document.

The contact data referred to in point 3.5 is collected solely for the purpose of ensuring the uniqueness of the information, which is not personal, received or submitted via the form. This data is not used for the purpose of contacting the user who filled them in.

#### **5) Processing method, processing duration**

The personal data referred to in point 3 is collected directly from you, through the completion of paper forms, direct e-mail messages, business cards, online forms, etc., or communicated by third parties to whom you have given your consent. This data is stored in the Companies' internal address books, together with any consents you may have

given where necessary, and is available in the diaries of salespeople for common use (mainly email address books, company mobile phones).

Specifically, the data is subject to collection, filing, organisation, selection, extraction, storage, use, deletion and destruction.

This data is used (with your consent where necessary), for the purposes indicated in point 4 only, and is kept for a period of 3 years, after which it is reviewed and updated or deleted if obsolete.

Unless you specifically and explicitly state otherwise, the data referred to in point 3.5, for the above-mentioned purposes, does not enter some of the lists used by the Companies, for direct or mass marketing activities. This data is deleted 5 years after their acquisition, or at the moment when the Contact Persons decide to activate an anonymisation process.

#### **6) Data Access**

Your data may be made accessible for the purposes referred to in point 4) to employees and collaborators of the Joint Owners, authorised to process and/or system administrators, or to third party companies or other parties authorised by the Data Controller, in their capacity as external data processors. These processors undertake to implement all appropriate security systems to protect your data, and adhere to a protocol of security procedures and policies that the Controller has produced and constantly updates.

#### **7) Data Communication**

Without the need for express consent (ex art. 6 lett. b), c) of the GDPR), the Joint Owners may communicate your data to Supervisory Bodies, Judicial Authorities, insurance companies for the provision of insurance services, as well as to those subjects to whom communication is compulsory by law for the fulfilment of the aforementioned purposes. These subjects will process the data in their capacity as autonomous data controllers. Your data will not be disclosed, except for the passive dissemination envisaged by publication on the website (as per point 3.4).

The data referred to in point 3.1, for the purposes expressed in point 4, will be communicated to entities supporting the disbursement of funding dedicated to training (e.g. Fondimpresa), or directly to the disbursing entities, for the purpose of obtaining the funding provided.

#### **8) Data transfer to non-EU countries**

The data provided under point 3) is stored electronically in the cloud, on the software for managing the newsletter, and in paper format in archives located at the offices of Via Alba 26 in Barolo.

It is in any case understood that the Data Controller, should it become necessary, shall have the right to move the servers also outside the EU, for example in the case of use of Cloud services. In this case, the Data Controller assures you as of now that the transfer of data outside the EU will take place in compliance with the applicable legal provisions, subject to the stipulation of the standard contractual clauses provided for by the European Commission.

#### **9) Rights of the data subject**

As a data subject, you enjoy the rights set out in Articles 15, 16, 17, 18, 19, 20, 21 and 22 of the GDPR. In detail:

- Right of access
- Right to correct
- Right to erasure ("right to be forgotten")
- Right to restriction of processing
- Right to Obligation to notify in case of correction or erasure of personal data or restriction of processing
- Right to data portability
- Right to object
- Rights relating to automated decision-making concerning natural persons, including profiling

#### **10) Procedures for exercising the rights of the data subject**

You may exercise your rights at any time by sending:

- a registered letter with acknowledgement of receipt addressed to the Data Controller, referred to in point 1)
- an e-mail to [privacy@astemiapentita.it](mailto:privacy@astemiapentita.it)