

**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 when subscribing to the newsletter.

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**

The processing relates solely to your e-mail address

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

The purpose of processing the data referred to in point 3 is to send you newsletters on behalf of the Joint Owners, containing institutional, commercial or promotional information. The provision of data is optional. Such processing is lawful according to Art. 6, para. 1, letter a) and requires your explicit consent.

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

Your data is collected either through the registration forms on the website, or through the paper coupons that you can find at the company shop. In the first case, consent is provided electronically: it is given by means of a flag and is simultaneous with registration. The data is immediately recorded in the database on which the newsletter is based. In the second case, on the other hand, consent is acquired in paper form, with a signature on the subscription coupon, and subsequently your address is recorded by an operator in the newsletter database.

#### **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)

L"ASTEMIA S.R.L.  
TENUTE DEL VINO S.R.L.  
Barolo (CN)