

**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 Data Controllers) process your personal data, communicated by you in your capacity as a representative, in whatever capacity, of a customer. 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 joint controllership agreement.

## **2) Appointment of DPO**

Since the Joint Data Controllers 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 to personal, identification, contact data (e.g. name, surname, telephone, e-mail)

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

The purpose of processing the data referred to in point 3 is to enable the execution of the commercial contract concluded with the Company you represent. For this specific purpose, the provision of data is compulsory, otherwise it will not be possible to properly manage the ordering and sales process. This processing is legitimate under Art. 6, paragraph 1, letter b)

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

Your data is collected from you using common means of communication, in the process of order and sales management, by the sales staff belonging to the Joint Data Controllers, and it is recorded in the address books of the devices used by the sales staff, in the company management system, in the areas designated for this purpose. This data is updated over time according to the information that the Joint Data Controllers receive.

The processing of your data is carried out by means of the operations indicated in Art. 4 n. 2) GDPR and precisely: collection, recording, organisation, storage, consultation, use, blocking, communication, cancellation and destruction. Your data is subject to electronic and/or automated processing.

Your data is processed only for the period in which it is useful for the management of the sales contract, after which it remains in the company archives, stored for a period of 10 years from the end of its last use. After this period, it is deleted, together with the rest of the obsolete fiscal documentation.

## **6) Data Access**

Your data may be made accessible for the purposes referred to in point 4) to employees and collaborators of the Joint Data Controllers, 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 Data Controllers 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.

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

The data provided under point 3) is stored electronically on dedicated company servers, provided by external data controllers, or in Cloud platforms adopted by the Joint Data Controllers.

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)