

# Privacy Policy Statement Newsletter Users

# PRIVACY POLICY STATEMENT PURSUANT TO ART. 13 OF REGULATION (EU) NO. 2016/679 ON PERSONAL DATA PROTECTION ("GDPR")

BUSI GIOVANNI S.R.L, with registered office at Via Molini 24, 25082 Botticino Sera (Brescia, Italy), Tax Code and VAT No. 02057080174 (hereinafter "Data Controller"), in its capacity as data controller, hereby informs you pursuant to art. 13 of Regulation (EU) No. 2016/679 ("GDPR") that your data will be processed by the procedures and for the purposes which follow:

#### 1. Data which are Processed

The Data Controller processes your personal data, which is understood to be ordinary business contact identification which you have contributed through the section for subscribing to our Newsletter from the <a href="www.busigiovanni.com">www.busigiovanni.com</a> Internet site or

supplied during the sale of one of our products or services, in your capacity as customer.

#### 2. Purpose of the data processing

Your personal data may be processed for <u>marketing purposes</u>, through the periodic dispatch of our sales Newsletter (via email):

- If you have registered voluntarily from the <a href="www.busigiovanni.com">www.busigiovanni.com</a> Internet site, this occurs only further to your specific consent (art. 6 comma 1 a. GDPR) issued at the time of registration, to inform you about the Data Controller's products, services and initiatives.
- If you have already purchased from us, we may use your email contacts used during the sale of one of our services, without requesting your specific consent, for the aforesaid marketing purposes, to inform you about services similar to those sold. Initially or on receipt of subsequent communications, you may object at any time to the data processing free of charge, or directly unsubscribe from our newsletter (ref. Art 130, comma 4 Legislative Decree 196/03 Italian Data Protection Code).

## 3. Data processing procedures and duration

Your personal data may be processed through the operations specified in art. 4 comma 2 of the GDPR, and specifically: collection, recording, organisation, storage, consultation, treatment, selection, retrieval, alignment, use, combination, freezing, disclosure, erasure or destruction of data. Your personal data may be processed both on paper and by electronic means.

The Data Controller will process the personal data for the marketing purposes set out above, throughout the period of subscription to the newsletter and subsequently for the time strictly necessary to erase your data from the newsletter mailing list in response to your intention to withdraw the consent provided or your stated decision to unsubscribe from the sales newsletter. The data relating to previous newsletter dispatches will be stored for a maximum period of two years.

#### 4. Access to data

Your data may be rendered accessible for the purposes set out in art. 2 above:

- to the Data Controller's employees and associates, in their capacity as data processors and/or persons in charge of the processing and/or system administrators;
- to external companies or other entities (such as marketing service providers, etc.) which provide services to the Data Controller in their capacity as external Data Processors.

#### 5. Disclosure of data

Pursuant to art. 6 commas b) and c) of the GDPR and thus without the need for specific consent, the Data Controller may disclose your data, for the purposes deriving from the service contract relationship, to judicial authorities, and the entities to which disclosure is compulsory by law for the fulfilment of the said purposes.

The said parties will process the data in their capacity as independent Data Controllers.

Your data will not be disseminated.

#### 6. Transfer of data

The personal data may be transferred, for the purposes set out in this privacy policy statement and for storage and conservation needs, both to European Union countries and to third countries which are not in the European Union. In all cases, the Data Controller hereby assures data subjects that any transfer of data outside the EU will take place in compliance with the relevant legal requirements.

#### 7. Nature of contribution of data and consequences of refusal to reply

The contribution of data for marketing purposes as per art. 2 is optional; you may therefore decide not to contribute any data or to withdraw your consent to the processing of data already supplied at a later date: in this case, you will no longer be able to receive the commercial newsletters relating to the services offered by the Data Controller.



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## 8. Rights of the data subject

In your role as data subject, you may exercise the following rights, as envisaged by articles 15 to 22 of Reg. (EU) 2016/679:

- right to apply to the data controller for access to your personal data (art. 15);
- right to apply to the data controller for correction of your personal data (art. 16);
- right to apply to the data controller for deletion of your personal data (art. 17);
- right to apply to the data controller for restriction of the processing which concerns you (art. 18);
- right to the portability of the data (art. 20);
- right to object to the processing (art. 21)
- right with regard to automated decision-making processes (art. 22).

If the processing is based on article 6, comma 1 (a), you have the right to withdraw consent at any moment, without prejudice to the lawfulness of the data processing based on the consent given prior to the withdrawal.

You also have the right to lodge a complaint with the Italian Personal Data Protection Authority.

## 9. Procedure for the exercise of rights

You may exercise your rights at any time by sending a registered letter with return receipt to BUSI GIOVANNI S.R.L, at Via Molini 24, 25082 Botticino Sera (Brescia, Italy), or an email to <a href="mailto-busi@busigiovanni.com">busi@busigiovanni.com</a>

#### 10. Data Controller and Data Processors

The Data Controller is BUSI GIOVANNI S.R.L, with registered office at Via Molini 24, 25082 Botticino Sera (Brescia, Italy), Tax Code and VAT No. 02057080174.

The updated list of the data processors is kept at the registered office of the Data Controller.

**BUSI GIOVANNI S.R.L.**