

GDPR - General Data Protection Regulation

The company ORINGONE S.R.L., based in via TRIBOLINA, n° 16/B, GRUMELLO DEL MONTE (BG), Fiscal Code and VAT number 03705420168 (hereafter, "Data Controller"), as data controller, informs you pursuant to art. 13 EU Regulation n. 2016/679 (hereinafter, "GDPR") that your data will be processed in the manner and for the purposes described:

1. Object of the processing

The Data Controller processes personal data, identifying and non-sensitive data specifically, name, surname, tax code, VAT number, email address, telephone number - hereafter, "personal data" or even "data" that you have communicated;

- at the conclusion of **contracts** for the goods / services of the Data Controller.

2. Purpose of the Processing

Your data are processed:

A. without your express consent [Article 6 letter b) and e) of the GDPR], for the following Service Purposes:

- close the contracts for the goods / services of the Data Controller;
- fulfillment of pre-contractual and contractual obligations set forth by any relevant agreement;
- fulfill the obligations established by the Law, by a regulation, by the Community legislation or by an order of the Authority (such as for Anti-Money Laundering);
- exercise the rights of the Data Controller, for example the right



to defense in court.

B. Only in the case of prior specific and distinct consent (Article 7 GDPR), for the following Marketing Purposes:

- o Sending by via e-mail, and / or sms and / or telephone contacts, newsletters, commercial communications and / or advertising material about products or services offered by the Data Controller and survey of the degree of satisfaction on the quality of goods / services.

3. Processing Modalities

The data processing shall be conducted pursuant to art. 4 n.2) of GDPR, through the following operations: collection, recording, mining, comparison, use, exchange, blocking, communication, cancellation and destruction of data.

Your data will be subject to a paper and electric/automated processing.

Your data will be retained for a period appropriate for the purpose of the processing, and in any case not longer than 30 years starting from the termination of the relationship for the purposes of service and for no more than 30 years from the collection of data for the purposes of marketing, in the case of prior consent.

4. Access to Data

Your data may be made accessible for the purposes referred to in art. 2.A) and 2.B) of this information note:

- o to employees and collaborators of the Data Controller or of the Group companies of which the Controller belongs, in their capacity as people appointed and / or internal managers of the processing and / or system



administrators;

- to Group companies of which the Data Controller is a part (for example, for supporting activities in the production of goods / services, for logistics management activities, for storage of personal data, etc.) or for third-party companies or other subjects (for example, providers for the management and maintenance of the website, suppliers, lenders, professional offices, etc) who carry out outsourced activities on behalf of the Data Controller, in their capacity as external processors.

5.Communication of Data

Without the need for your express consent (pursuant to Article 6 letter b) and c) GDPR), the Data Controller may communicate your data for the purposes referred to art. 2.A) to Supervisory Bodies, Judicial Authorities and to all the other subjects to whom the communication is mandatory by law for the accomplishment of said purposes. These subjects will process the data in their capacity as independent data controllers. Your information will not be disclosed.

6.Data Transfer

The management and storage of personal data will be carried out on servers located within the European Union.

The servers are located at the data controller, or at third-party companies appointed as data processors.

Currently the servers are located in Italy, at the company headquarters. The data will not be transferred outside to the European Union. In any case, it is understood that the Data Controller, where necessary, will have the right to move the server location to Italy and / or the European Union and / or non-EU countries.



The Data Controller hereby ensures that the transfer of non-EU data will take place in accordance with the applicable legal provisions, stipulating, if necessary, agreements that guarantee an adequate level of protection and / or adopting the standard contractual clauses provided for European Commission.

7. Nature of the provision of data and consequences of refusal to reply

The provision of data for the purposes referred to art. 2.A) is mandatory. In their absence, we cannot guarantee you neither the registration to the site nor the services of the art. 2.A). The provision of data for the purposes referred to art. 2.B) is optional. You can therefore decide not to give any data or to subsequently deny the possibility of processing data already provided: in this case, you will receive newsletters, commercial communications and advertising material concerning the Services offered by the Data Controller. In any case, you will continue to be entitled to the Services referred to art. 2.A)

8. Rights of the data subject

In your capacity as an interested party, you have the rights referred to in art. 15 GDPR and precisely the rights of:

- i. to obtain confirmation of the existence or not of personal data concerning you, even if not yet registered and their communication in an intelligible form;
- ii. to obtain the indication: a) of the origin of personal data; b) of the purposes and methods of the processing; c) of the logic applied in case of treatment carried out with the aid of electronic instruments; d) of the identification details of the data controller, the data



processors managers and the designated representative pursuant to art. 3, paragraph 1, GDPR; e) the subjects or categories of subjects to whom the personal data may be communicated or who may become aware of it in their capacity as designated representative in the territory of the State, data processors or appointed;

- iii. to obtain: **a)** updating, rectification or, when interested, integration of data; **b)** cancellation in accordance with the law, which are not necessary or processed; **c)** the attestation that the operations referred to in subparagraphs a) and b) have been gathered knowledge, also with regard to their content, of which the data have been communicated;
- iv. to object, in whole or in part: a) for legitimate reasons, to the processing of personal data concerning you, even if pertinent to the purpose of the collection; b) to the processing of personal data concerning you for the purpose of sending advertising or direct sales material or for carrying out market research or commercial communication, through the use of automated call systems without the intervention of an operator by email and / or through traditional marketing methods by telephone and / or paper mail. It should be noted that the right of opposition of the interested party, set out in point b) above, for direct marketing purposes through automated methods extends to traditional ones and that in any case the possibility remains for the data subject to exercise the right to object even only partially.

Therefore, the interested party can decide to receive only communications using traditional methods or only automated communications or none of the two types



of communication.

Where applicable, it also has the rights referred to Articles 16-21 GDPR (Right of rectification, right to be forgotten, right of limitation of treatment, right to data portability, right of opposition), as well as the right of complaint to the Guarantor Authority.

9.How to exercise rights

You can exercise your rights at any time by sending:

- o a registered letter to ORINGONE S.R.L., via TRIBOLINA, n° 16/B, GRUMELLO DEL MONTE (BG).
- o an e-mail to the address: privacy@oringone.com

10.Data Controller, Data Processor and people appointed

The Data Controller is ORINGONE S.R.L., based in via TRIBOLINA, n° 16/B, GRUMELLO DEL MONTE (BG), Fiscal code and VAT number 03705420168.

The updated list of data processors and people appointed is at the Data Controller's headquarters.

