

PRIVACY POLICY

(Information on the processing of personal data - Art. 13 of EU Regulation 679/2016)

Introduction

Pursuant to European Regulation no. 679/2016 (hereinafter the “Regulation”) and national legislation on the protection of personal data (hereinafter collectively the “Privacy Legislation”), Alis S.r.l., owner of the Casa Rinaldi brand, invites you to read this policy carefully, as it contains important information on the protection of your personal data.

The processing of your personal data will be based on the principles of fairness, lawfulness, transparency, purpose and storage limitation, data minimisation and accuracy, integrity and confidentiality, in accordance with the provisions of the Privacy Legislation.

Data Controller

The Data Controller of Personal Data is Alis S.r.l. (hereinafter “Alis” and/or the “Controller”), with registered office at Via Paletti, 2A - 41051 Castelnovo Rangone (MO), represented by its legal representative pro tempore.

Data Processors

Your personal data may be processed by companies appointed, in their capacity as Data Processors, to carry out personal-data processing activities on behalf of Alis. The Controller has drawn up a constantly updated list of Data Processors, which is made available to you by contacting the Controller at the addresses indicated in this Policy.

Personal data processed

- Common identification data (such as name, surname);
- Company of affiliation;
- Contact details (email, postal address, telephone number);
- Data relating to video surveillance recordings.

Alis does not intentionally collect personal data relating to minors.

Purposes and legal basis of processing

The purposes of personal-data processing and the related legal bases are indicated below:

- Management of requests through the website: personal data will be collected for the purpose of managing and responding to requests. The legal basis for such processing is the *legitimate interest of the Controller* (Art. 6(1)(f) GDPR).

- Visitors accessing the company premises: processing will be carried out to comply with a legal obligation (health and safety in the workplace), as provided for by Art. 6(1)(c) GDPR.
- Events and conferences: processing will be carried out for the performance of pre-contractual or contractual measures and in the Controller's legitimate interest, as provided for by Art. 6(1)(b) and Art. 6(1)(f) GDPR.
- Contractual activities as customers or suppliers: processing will be carried out for the performance of pre-contractual or contractual measures, as provided for by Art. 6(1)(b) GDPR.
- Video surveillance recordings: personal data will be collected for security purposes and to protect company assets. The legal basis for this processing is the legitimate interest of the Controller (Art. 6(1)(f) GDPR);
- Any further purpose in relation to which you have expressly given your consent may be withdrawn at any time (Art. 6(1)(a) GDPR).

We will not use your personal data for purposes other than and additional to those described in this Policy, unless we inform you in advance and, where necessary, obtain your further consent.

Processing methods

Your personal data will be processed in accordance with the requirements of current Privacy Legislation, both with the aid of electronic and automated means and manually, according to criteria strictly related to the purposes of processing, through databases, electronic platforms managed by Alis or by third parties (appointed as Data Processors and/or Joint Controllers), Alis's integrated IT systems and those of the aforementioned third parties, and/or websites owned by or used by Alis. Your data will be processed in a manner designed to ensure maximum security and confidentiality and only by persons who have been instructed and authorised to process it. The Controller adopts technical and organisational measures capable of ensuring a level of security appropriate to the risk of the processing.

Personal data is processed mainly at the Controller's premises and at the places where the Data Processors are located.

Sharing and transfer of personal data

Your personal data may be made accessible, for the purposes stated above, to employees and collaborators of Alis, as well as to the parties identified as Data Processors pursuant to the second paragraph of this document.

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No transfers of personal data to third-party companies located outside the EU/EEA are envisaged. Finally, your data may be transmitted to the Judicial Authority where necessary and in the cases provided for by law.

Data retention period

In order to ensure compliance with the principles of necessity and proportionality of processing, different personal-data retention periods have been identified in relation to the individual purposes pursued:

- Data collected for *managing and responding to requests* will be retained for the period necessary to handle the requests and subsequently deleted if no further contact occurs after six months.
- Data collected when accessing the company premises will be retained for the time strictly necessary to manage the visit and will be deleted within one month of registration.
- Data collected at events and conferences will be retained for the period necessary to initiate any contractual activities and subsequently deleted if no further contact occurs after six months.
- Data collected for contractual activities will be processed as long as purchase or sales contracts are active and will be deleted after the statutory retention periods for tax information have expired.
- Data collected by the *video surveillance system* will be retained for 72 hours;

Rights of the data subject

You may at any time exercise against the Controller the rights provided for by Articles 15 et seq. of the Regulation, including:

- a) the right to obtain confirmation as to whether personal data concerning you exists, even if not yet recorded, and its communication in intelligible form;
- b) the right to withdraw at any time the consent you have given in relation to the purposes of processing;
- c) the right to obtain access to, rectification or erasure of, restriction of processing and portability of personal data;
- d) the right to object to processing at any time;
- e) the right to lodge a complaint with the competent Supervisory Authority if you believe that the processing of your data is contrary to the legislation in force.

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How to exercise your rights

If you wish to exercise the above rights, or to receive further clarification on the processing of your personal data, you can write to the email address privacy@casarinaldi.it or to the address of the Controller's registered office at Via Paletti, 2A - 41051 Castelnovo Rangone (MO).