



**Information on the processing of personal data  
According to Art. 13 - 14 of EU Regulation 2016/679 (GDPR)**

## **Introduction**

The data subject (user or visitor of the website) is hereby informed that Legislative Decree 196/2003 ss.mm. (so-called "Personal Data Protection Code" - hereinafter, for brevity, the "Code") and EU Regulation No. 2016/679 (hereinafter, for brevity, the "GDPR") provide for the protection of the processing of personal data. In accordance with the provisions of the Code, the GDPR and the relevant legislation in force, the Processing will be based on the principles of fairness, lawfulness and transparency, respecting the fundamental rights and freedoms and the dignity of the data subject, with particular reference to confidentiality, personal identity and the right to protection of personal data.

This notice is provided pursuant to Article 13 of the Code, as well as Articles 13 and 14 of the GDPR, and is subject to updates, which will be published on the website. We therefore recommend that you check the policy regularly and refer to the most recent version.

## **1. Definitions**

1.1 For the purposes of this Notice:

- (a) "Database" means any organised complex of Personal Data, divided into one or more units, located at one or more sites of the Data Controller;
- (b) "Communication" means the communication of Personal Data to one or more designated parties other than the Data Subject, the Data Controller's representative in the territory of the State, the Data Processor and the Persons in charge, in any form, including by making them available or consulting them;
- (c) "Consent" shall mean any expression of the data subject's free, specific, informed and unambiguous will by which the data subject expresses his or her consent, by means of a statement or an unambiguous positive action, to the processing of personal data concerning him or her;
- (d) "Personal Data" shall mean any information relating to a natural person who is identified or identifiable, even indirectly, by reference to other information;
- (e) "Controller" shall mean the natural person who is authorised by the controller or processor to carry out the processing operations;
- (f) "Data Subject" shall mean the natural person to whom the Personal Data relates;
- (g) "Disclosure" means the disclosure made pursuant to Articles 13 and 14 of the GDPR;
- (h) "Products", the products displayed on the Website;
- (i) 'Pseudonymisation' means the processing of personal data in such a way that it cannot be attributed to a specific data subject without the use of additional information, provided that such additional information is stored separately and that technical and organisational measures are taken to ensure that the personal data cannot be attributed to an identified or identifiable natural person;
- (j) "Data Controller" means the natural person, legal entity, public administration and any other entity, association or body appointed by the Data Controller to process Personal Data in accordance with Article 28 of the GDPR;
- (k) "Services" means the services provided by the Company, including through the Website;
- (l) "Website" means the website owned by the Data Controller and accessible via the link [www.luxyt.it](http://www.luxyt.it);
- (m) "Data Controller" means the natural person, the legal person, the public administration and any other entity, association or body which is responsible, even jointly with another Data Controller, for decisions regarding the purposes, methods and tools used for the processing of personal data, including the security profile.

(n) "Processing" shall mean any complex operation, carried out even without the aid of electronic instruments, concerning the collection, recording, organisation, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, dissemination, erasure and destruction of data, even if not recorded in a database

(o) "User" means any natural person who uses the Website.

## **2. Data controller**

2.1. The data controller is Vendis Group S.r.l., with registered office in 44122 Ferrara (FE), Via Tancredi Trotti Mosti, n. 63, tax code, VAT number and registration number with the Ferrara Register of Companies 02051520381 (hereinafter, for brevity, the "Data Controller" or the "Company").

2.2. Information and requests regarding privacy, including the exercise of the rights of the interested party indicated in article 9 below, may be addressed to the Data Controller.

## **3. Place of data processing and data communication**

3.1. The processing of personal data shall take place at the offices of the Company and by the personnel in charge of the processing. The data is processed and stored on servers located within the European Union. The servers are currently located in Italy. The Data Controller reserves the right to change the location of the servers also outside the European Union, ensuring in this case that the transfer takes place in accordance with the applicable legal provisions, with the appropriate guarantees provided by Article 46 of the GDPR.

## **4. Types of data processed and purposes of processing**

### Data provided voluntarily by users

The voluntary, optional and explicit provision of data by the user (for example, when sending electronic mail to the addresses indicated on the website) entails the subsequent acquisition of the sender's address and the data provided by him/her, for which the user expressly consents to their processing.

Personal data are collected and processed for the following purposes

(a) to conclude, manage and execute the request for contact or supply of services and/or products sent by the data subject;

b) the completion, management and execution of the request sent by the Data Subject to be included in the newsletter and mailing list of the Data Controller in order to receive, via e-mail or SMS, commercial and/or promotional and/or advertising communications relating to the services and/or products provided and/or supplied by the Data Controller, also by means of communication of the data to third party suppliers of the Company;

c) organisation, management and execution of requests for contact and provision of services, also through communication to third parties in general, including suppliers and/or collaborators of the Company for the provision of services

d) the defence of rights and/or the fulfilment of obligations under the law and at the request of the competent authorities

e) to comply with legal obligations or other requirements of the competent authorities.

In order to stop the transmission of the newsletter and the mailing list, the interested party may, at any time, carry out the procedure to cancel the service by following the instructions contained in the communications received.

### Data collected through registration on the website

By registering on the relevant page of the Website, the User authorises the Company to process personal data such as, but not limited to, first name, surname, telephone number and e-mail address, for the sole purpose of completing and managing the process of creating, registering and using the functions related to the provision of services through the Website.

The personal data collected by filling in the registration form on the Website will be processed for the following purposes

- (a) to provide the Services to the Data Subject in accordance with the General Terms and Conditions signed by the Data Subject;
- b) to conclude, manage and execute the request for contact or provision of services sent by the interested party;
- c) to organise, manage and execute the requests for contact and provision of services, also by means of communication to third parties in general, including the Company's suppliers and/or collaborators for the provision of services;
- d) defence of rights and/or fulfilment of obligations provided for by law and at the request of the competent authorities;
- e) administrative management and fulfilment of legal obligations (e.g. accounting, tax);
- f) marketing for the purpose of sending commercial communications by traditional means (mail and operator-assisted telephone) or automated means (e-mail, unoperated telephone, SMS, push notification, instant messaging application, live chat, social media, WhatsApp, Telegram) related to the activities of the Owner or third party clients, customers or partners of the Owner;
- (g) Carrying out market and statistical analyses;
- h) sharing the information with third parties as set out in section 7 of the Notice below.

In any event, if the data controller intends to further process the personal data for a purpose other than that for which it was collected, the data controller will, prior to such further processing, provide the data subject with information about such other purpose and any other relevant information.

#### Navigation data

The computer systems and software procedures used to operate the website acquire, in the course of their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols. This is information that is not collected in order to be associated with identified data subjects, but which by its very nature could, through processing and association with data held by third parties, allow users to be identified. This category of data includes the IP addresses or domain names of the computers used by users connecting to the site, the time of the request, the method used to send the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the user's operating system and computer environment. This data is used for the sole purpose of obtaining anonymous statistical information on the use of the site and to check its correct functioning and is deleted immediately after processing. The data could be used to establish responsibility in the event of hypothetical computer crimes against the site. In any case, the data will be kept for the time strictly necessary and in any case in accordance with the regulations in force.

#### Cookies

Full details of this type of data are provided in the dedicated "Cookie Policy" section, which can be consulted on the Website, or by means of a specific information text displayed prior to the collection of cookies, which requires the consent of the Website user.

The Site uses services and interactions with external platforms in order to provide the best browsing experience. These external services and platforms may collect information on the user's behaviour for the owner, always anonymously and never identifying. These external services and platforms may also collect some User data that is directly governed by their own privacy settings.

#### **5. Methods and duration of processing**

The processing of personal data is based on principles of correctness, lawfulness and transparency, and the data collected are

- (a) processed with the aid of automated, electronic, computerised and telematic means, or manually, with logic related to the purposes for which the data was collected;
- b) processed in a lawful, fair and transparent manner towards the data subject;

- (c) collected for specified, explicit and legitimate purposes and subsequently processed in a manner not incompatible with those purposes; and
- (d) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- (e) accurate and, where necessary, up to date;
- f) stored in a manner that allows the identification of the data subject for a period of time not exceeding the achievement of the purposes for which they are processed;
- g) processed in a manner that ensures adequate security of Personal Data, including protection through appropriate technical and organisational measures against unauthorised or unlawful processing and against accidental loss, destruction or damage.

The data subject's personal data may be used to request information, including by telephone, on the quality of the services offered, for the purposes of marketing the services.

The data will be kept for the time strictly necessary for the purposes pursued, taking into account legal obligations and the limits established by law with regard to the deletion of the data.

#### **6. Optional nature of the provision of data**

With the exception of navigation data, the provision of data by the data subject is optional, but refusal to provide the data may make it impossible to provide a timely and correct response to the contact request or to provide the services requested by the data subject.

#### **7. Communication and transfer of personal data**

With the express consent of the data subject, personal data may be communicated to

- (a) to companies controlled by or affiliated with the data controller;
- b) to third party suppliers of the Company for the provision of services to the Data Subject, in accordance with the provisions of Article 28 of the GDPR;
- c) to third parties who provide administrative, payment and billing services on behalf of the Data Controller, or even legal advisors and webmasters acting on behalf of the Data Controller, in accordance with the provisions of Article 28 GDPR;
- d) to third party companies that are customers, principals or partners of the Data Controller, so that they, acting as autonomous Data Controllers, carry out commercial communications invited via the web, e-mail, telephone (SMS and telemarketing). To know the list of third parties to whom the data may be communicated, please contact the Data Controller;
- e) to administrative or judicial authorities for the fulfilment of legal obligations.

Any communication beyond what is indicated here will only take place with the consent of the interested party.

The data may then be communicated, transferred or licensed for use, with the express consent of the interested party, to natural and/or legal persons for the same purposes as those indicated in this notice. Such persons will act as data controllers or data processors.

The data may be transferred to countries belonging to the European Union and to countries outside the EU for the purposes indicated in this policy. In this case, the data will be transferred to

- a. to third countries or international organisations for which the Commission has carried out an adequacy assessment (Article 45 GDPR);
- b. to third countries or international organisations that have provided adequate safeguards (including with contractual clauses and the other provisions of Article 46 GDPR);
- c. to third countries or international organisations on the basis of exceptions in specific situations (Article 49 GDPR).

#### **8. Information security**

All information collected on the Site is stored and maintained in secure facilities with access restricted to authorised personnel. The Website is regularly monitored for security breaches and to ensure that the information collected is safe from those who may wish to view it without authorisation. The Owner complies

with the security measures required by applicable laws and regulations and takes all appropriate measures in accordance with current best practice criteria to ensure and guarantee the confidentiality of users' personal data and to minimise, as far as possible, the risks of unauthorised access, removal, loss or damage to users' personal data.

Pursuant to Art. 32 GDPR, taking into account the state of the art and the cost of implementation, as well as the nature, scope, context and purposes of the processing, and the risks having different probabilities and severity for the rights and freedoms of the natural persons concerned by the processing, both at the time of determining the means of the processing and at the time of the processing itself, The Company implements appropriate technical and organisational measures, such as pseudonymisation and encryption of personal data, aimed at effectively implementing data protection principles, such as minimisation, and integrating them into the Processing with the necessary safeguards to meet the requirements of the GDPR and protect the rights of data subjects.

#### 9. Rights of the data subject

The Data Subject may, at any time, exercise the rights set forth in Article 7 of the Code and Chapter III of the GDPR. In particular, the Data Subject shall have the right to

- (a) **Access** to the data concerning him/her to obtain information on the methods and purposes of the processing;
- b) **rectification**, to request that the Personal Data provided be corrected or supplemented if inaccurate;
- c) **deletion**, to request the deletion of the Personal Data in case of revocation of consent or opposition to the processing, in case of unlawful processing or if there is a legal obligation to delete;
- d) the **restriction** of the processing of the personal data provided, if one of the conditions set out in Article 18 of the GDPR is met;
- e) **object**, at any time, to the processing of Personal Data, unless there is a legitimate interest of the Data Controller to continue the processing that overrides the right to object;
- f) **portability**, to receive the personal data or to have them transmitted to another controller designated for this purpose, in a structured, commonly used and machine-readable format.

In addition, pursuant to Article 7(3) of the GDPR, the data subject may exercise the right to revoke the Consent at any time. The withdrawal of the Consent does not affect the lawfulness of the processing based on the Consent obtained prior to the withdrawal. If the consent is withdrawn, the data of the data subject will be permanently deleted.

The data subject also has the right to lodge a complaint with the supervisory authority, which in Italy is the Guarantor for the protection of personal data.

\* \* \*

<input type="checkbox"/> I confirm that I have read the Privacy Policy.
<input type="checkbox"/> I consent to the processing of data for commercial, market analysis and marketing purposes as described in point 4 of the Notice.
<input type="checkbox"/> I consent to the processing of data for disclosure to third parties as described in points 4 and 7 of the Notice.