

INFORMATION ON THE PROCESSING OF PERSONAL DATA
made pursuant to art. 13 of Regulation (EU) 2016/679
General Data Protection Regulation
WEBSITE NAVIGATION, E-COMMERCE AND NEWSLETTER
COOKIE POLICY

Who is the Data Controller?	Maltempi Srl , with headquarters in Via Malignani 1/a Fontanafredda (PN). Contact details are privacy@maltempisrl.com
How can I contact the DPO?	The appointed DPO can be contacted at the email address dpo@maltempisrl.com
What personal data do we process?	<p>For the operation and navigation of the site we process :</p> <ul style="list-style-type: none"> Browsing data (including, for example, IP addresses, URI/URL addresses of requested resources); Data possibly collected by means of cookies, for which reference is made to the specific cookie policy. <p>For access to the services provided by e-Commerce we process :</p> <ul style="list-style-type: none"> Common personal data (name, surname, residential address, shipping address if not the same) ; Identification documents (such as, for example, the passport for the execution of tax relief requests for subjects domiciled and resident outside the European Community as per Presidential Decree 633/1972); Personal contact details (telephone number and email address); Personal identification data for billing purposes (Tax Code or VAT number) ; Electronic payment data.
Why do we process Personal Data? (Purpose)	<ol style="list-style-type: none"> To allow the interested party to navigate the website of the Data Controller; To carry out research and/or statistical analysis activities on aggregate or anonymous data, without the possibility of identifying the user; To register for Maltempi Srl e-Commerce ; To execute purchase orders received via e-Commerce; To manage relationships with Maltempi Srl Customers (e.g. purchase assistance, response to questions, refund operations). To manage requests for information received by the Data Controller via a specific form on the website; To allow the user to subscribe to the newsletter ; soft-spam forwarding ; To fulfill all obligations required by law (for example, those connected to the management of the purchase contract or to the execution of requests for tax relief for subjects domiciled and resident outside the European Community pursuant to Presidential Decree 633/1972); For the need to ascertain, exercise or defend a right in court or whenever the Authorities exercise their functions.
What is the Processing based on? (Legal Basis)	<ol style="list-style-type: none"> The treatments sub. 1), sub. 2), sub. 8) and sub. 10) are connected to the legitimate interest of the Data Controller. The processing referred to in sub. 3), sub. 4), sub. 5) and sub. 6) is based on the execution of a contract to which the interested party is a party or on the execution of pre-contractual measures adopted at the request of the same ; The processing under 7) is subject to the acquisition of free, specific and informed consent from the interested party. The processing referred to in point 9) is related to compliance with the obligations of the law , regulation and community legislation to which the Data Controller is subject.
How do we process personal data?	In computer mode, with the observance of all precautionary measures applied by the Owner which guarantee its security, confidentiality and control.

	<p>The data may also be stored and processed on servers located outside the European Community in compliance with current legislation.</p>
<p>To whom do we communicate personal data? (Categories of Recipients)</p>	<p>a. Employees, collaborators, persons appointed and authorised by the Data Controller;</p> <p>b. Service providers, who act as Data Processors pursuant to art.28 GDPR, such as, for example, the entity that manages the website;</p> <p>c. Persons legally authorised to access the data;</p> <p>d. Subjects to whom communication is necessary for the fulfillment of contractual obligations;</p> <p>e. Public authorities;</p> <p>f. Third Parties.</p> <p>The personal data processed by the Data Controller are in no way subject to disclosure.</p>
<p>How long do we retain personal data?</p>	<p>Personal data will be stored for the time necessary to achieve the purposes indicated above. In any case, the data will be processed by the Data Controller:</p> <ol style="list-style-type: none"> 1. For a period not exceeding 7 days for navigation data from the moment of their acquisition; 2. For a period not exceeding 24 months from the date of the interested party's consent to register for the newsletter, except in the case of early revocation of consent, or in the case of sending soft spam, starting from the date of the last purchase by the Customer; 3. For a period not exceeding 10 years from the acquisition of the data, when the interested party has communicated them in order to use services provided by the Data Controller, unless the statute of limitations has intervened. <p>In any case, the need to retain the data for the purposes of fulfilling legal obligations of the Data Controller or for the ascertainment, exercise or defense in court of the Data Controller's rights remains intact.</p> <p>By way of example, the criteria used to determine the further retention period of the data are indicated below :</p> <ol style="list-style-type: none"> 1. Pursuit of the purposes related to the processing. 2. Retention time required by law. 3. Revocation of consent by the data subject (in case of processing based on consent). 4. Maximum term permitted by current legislation to protect the rights and/or interests of the Owner.
<p>Is the provision of personal data mandatory or optional? What happens if you refuse to provide personal data?</p>	<p>To navigate the site, it is necessary to provide navigation data and data contained in some cookies (technical cookies). Failure to provide such data may not guarantee an optimal navigation experience on this website, resulting in the impossibility of satisfying the interested party's requests.</p> <p>The provision of data for access to e-Commerce services is mandatory for the conclusion of the contract and for assistance activities related to the customer care service. The provision of data is also mandatory for the execution of the obligations provided by law for the Data Controller.</p> <p>Providing data for registration to the newsletter service is optional: failure to provide or revoking consent will make it impossible to receive the newsletter, without any impact on any other legal relationships that may exist.</p>
<p>What rights does the data subject have?</p>	<p>The interested party has the right to:</p> <ol style="list-style-type: none"> a. Access the data in our possession and request communication of it in an intelligible form; b. Request updating, rectification and/or integration; c. Request erasure ("right to be forgotten"); d. Request limitation of processing; e. Request notification of the update, rectification, cancellation, limitation; f. Request data portability; g. Object to processing;

	<p>h. Revoke previously granted consent;</p> <p>i. Lodge a complaint with a supervisory authority.</p>
Cookie Policy	<p>The site uses cookies to improve the user's browsing experience.</p> <p>The site uses technical cookies, Google Analytics statistical cookies, profiling and tracking cookies, marketing cookies.</p> <p>Through the interactive banner, the interested party will be able to control the activities of cookies.</p>

1 - Identity and contact details of the Data Controller

Maltempi Srl, with headquarters in Via Malignani 1 Fontanafredda (PN); contact details are privacy@maltempisrl.com.

1bis – Contact details of the DPO

The appointed DPO can be contacted at the email address dpo@maltempisrl.com

2 – Data source

The data subject to Processing activities are acquired directly from the interested party.

3 - Type of Data processed

The Data Controller collects and processes the data of the interested parties for the purposes specified in point 4 below. An exemplary list of the data processed is provided below:

For the operation and navigation of the site:

- I. **Browsing data** (including, for example, IP addresses, URI/URL addresses of requested resources);
- II. Data possibly collected by means of **cookies**, for which reference is made to the specific cookie policy.

To access the services provided by the Data Controller:

- I. **Common personal data** (name, surname, residential address, shipping address if not the same);
- II. **Identification documents** (such as, for example, the passport for the execution of tax relief requests for subjects domiciled and resident outside the European Community as per Presidential Decree 633/1972);
- III. **Personal contact details** (telephone number and email address)
- IV. **Personal identification data for billing purposes** (Tax Code or VAT number);
- V. **Electronic payment data**.

4 - Purpose and legal basis of data processing

The Data Controller will process data for the following purposes:

- 1) **To allow the user to navigate within the Maltempi Srl website and for research and/or statistical analysis activities on aggregate or anonymous data**, without the possibility of identifying the user, aimed at measuring the functioning of the site, measuring traffic and evaluating usability and interest of the site (without data processing by the owner). Both treatments are based on the **legitimate interest of the Data Controller**;
- 2) **To ensure registration on the Maltempi Srl E-Commerce portal**, through the creation of an account with which to also proceed with the purchase of products. This processing is based on the need to **implement pre-contractual measures**.
- 3) **To execute purchase orders received via E-Commerce**, as well as to **manage relationships with Maltempi Srl Customers** (e.g. purchase assistance, response to questions, refund operations). The

treatments described are based on the need to **execute a contract to which the interested party is a party**.

- 4) For the **management of requests from Users of the website** received by the Data Controller, by means of a specific form. In this case, the processing is based on the **execution of pre-contractual measures adopted by the Data Controller at the request of the interested party**.
- 5) In order to be able to **subscribe to the newsletter** and receive communications, upon the expression of **free, informed and unconditional consent** by the interested party.
- 6) In order to receive indirect marketing communications (so-called **soft spam**), based on the **legitimate interest of the Data Controller**.
- 7) To fulfill **legal, regulatory and community legislation obligations** to which the Data Controller is subject.
- 8) For **the establishment, exercise or defense, even in court**, of the rights of the Data Controller, this processing purpose is based on the **legitimate interest of the Data Controller**.

5 - Data processing methods

The processing of the Data will be carried out with the support of IT means, in compliance with the Regulation and the Code, and, in any case, in such a way as to guarantee the security and confidentiality of the data and prevent their unauthorised disclosure or use, alteration or destruction through efficient physical, logical and organisational security measures.

Where necessary for the pursuit of the purposes referred to in paragraph 4, the Data Subject's Data may be transferred abroad, to non-EU countries/organizations that guarantee compliance with the processing methods provided for by the GDPR.

6 - Data recipients

The data may be disclosed (limited to the respective area of competence and for the sole purpose of implementing the purposes described):

- a) subjects to whom the communication of data is necessary for the functioning of the website, who act as Data Processors, pursuant to written agreements stipulated with the Data Controller, such as for example the subject managing the website;
 - b) persons in charge and authorised by the Data Controller who have undertaken to maintain confidentiality or are subject to an adequate legal obligation of confidentiality (e.g. employees and collaborators of the Data Controller);
- In order to comply with legal obligations, regulations, community legislation or contractual obligations, as well as to exercise any rights in court, the following third parties may have access to the interested party's data, such as:
- (i) tax, legal or accounting consultants;
 - (ii) companies that provide the Data Controller with services instrumental to the management of the contractual relationship (e.g. suppliers of management applications, couriers and freight forwarders);
 - (iii) public and private supervisory and control authorities and bodies (e.g. Revenue Agency, judicial authority, etc.).

The data will not be disclosed.

The interested party may request from the Data Controller a list of suppliers and subjects involved in the processing of their personal data.

7 - Data retention period

Within the scope of the purposes indicated above, the data will be retained for the time strictly necessary to achieve the purposes for which they were collected and processed.

Without prejudice to the need to retain data for the purposes of fulfilling legal obligations of the Data Controller or for ascertaining, exercising or defending in court the Data Controller's rights, the interested party's data will not be retained for a period exceeding:

1. For a period not exceeding **7 days** for navigation data **on the website** from the moment of their acquisition;
2. For a period not exceeding **24 months** from the provision of consent to the **newsletter subscription** by the interested party, except in the case of withdrawal of consent, or, for the receipt of **soft spam communications**, from the date of execution of the last purchase;
3. For a period not exceeding **10 years** from the acquisition of the data, when the interested party has communicated them in order to **use services** provided by the Data Controller.

Afterwards, the same data will be destroyed or made anonymous in an irreversible manner, unless their further conservation is necessary to fulfill legal obligations or to comply with orders given by Public Authorities and/or Supervisory Bodies.

8 - Mandatory and optional nature of providing personal data

In order to navigate the site, the user must provide navigation data and data contained in some cookies (technical cookies). Failure to provide such data may result in a less than optimal navigation experience on this website.

The provision of data for access to e-Commerce services is mandatory for the conclusion of the contract and for assistance activities relating to the customer care service, as well as for the management of any related orders. The provision of data is also mandatory in the event of compliance by the Data Controller with a legal obligation.

As regards the provision of data relating to the registration for the newsletter service, it is optional: failure to provide or revocation of consent determines the impossibility of receiving the newsletter, without any impact on other legal relationships that may exist.

9 - Rights of the interested party

By sending a communication to the registered office of the owner or to the address privacy@maltempisrl.com, each interested party may at any time exercise the rights referred to in articles 15 and following of the Regulation, including: (i) obtain confirmation as to whether or not processing of Data concerning him or her is in progress; (ii) obtain access to his or her Data and the information indicated in art. 15 of the Regulation; (iii) obtain the rectification of inaccurate Data concerning him or her without unjustified delay or the integration of incomplete Data; (iv) request the erasure of Data concerning him or her without unjustified delay; (v) request the limitation of the processing of Data concerning him or her; (vi) be informed of any rectification or erasure or limitation of processing carried out in relation to the data concerning him or her; (vii) receive the Data concerning him or her in a structured, commonly used and machine-readable format; (viii) object at any time, for reasons connected to his or her particular situation, to the processing of data concerning him or her carried out on the basis of the legitimate interest of the Data Controller; (ix) **withdraw the consent given** for newsletter activities at any time, without any cost.

The complete list of the rights of the interested party can be found at <https://www.garanteprivacy.it/Regolamento/diritti-degli-interessati>.

The exercise of the above rights is not subject to any formal constraint and is free of charge. The interested party's request will be responded to within one month of receiving it. In cases of particular complexity, the deadline may be extended; in these cases, the Data Controller undertakes to provide at least one interlocutory communication within one month of receiving the request.

In the event of exercising one of the rights provided for by the Regulation, the Data Controller reserves the right to verify the identity of the interested party requesting, by requesting to send a photocopy of an identity document that certifies the legitimacy of the request. Once the identity of the interested party requesting has been confirmed, the photocopy received will be immediately destroyed.

10 - Complaint to the Supervisory Authority

If the interested party believes that the processing concerning him/her violates the provisions of the Regulation, he/she can always lodge a complaint with the Data Protection Authority (www.garanteprivacy.it), or with the Data Protection Authority of the country in which he/she habitually resides, works or of the place where the alleged violation occurred.

☐ Declare that I have read the privacy policy and agree to receive communications from the Data Controller, through the newsletter service. I am aware that I can revoke my consent at any time.

Cookie policy

The site uses cookies to improve the user's browsing experience. Cookies are usually text strings that the websites visited by the user or third-party sites, place and store within the device used by the user for navigation. The site uses:

- **Technical cookies**, where possible, subject to anonymization: these are necessary for the correct functioning of a website and to allow the user to navigate; without them the user may not be able to correctly view the pages or use some services. These do not require the user's consent.
- Google Analytics statistical cookies, also called **analytics cookies**, used solely to produce aggregate statistics in relation to the individual website visited. **Where these cookies do not limit user recognition, for example by anonymizing the fourth part of the IP, they will be treated as tracking cookies**, and therefore require consent.
- **Profiling and tracking cookies** (preferences): Profiling and tracking cookies create profiles on the user, reconstructing all of his/her activities carried out in the browser and this profiling will be used for mainly commercial purposes.
- **Marketing Cookies**: Marketing cookies are used to track visitors across websites to allow advertisers to display relevant and engaging ads. They are used to provide visitors with relevant ads and precise marketing campaigns, focusing on the user's web activity.

Please remember that for all cookies that necessarily require the user's consent for installation, their activity can be controlled by means of an interactive banner, from which the user can:

- View the cookies present;
- Accept the application of all cookies;
- Refuse the application of cookies, thus leaving active only the technical cookies necessary for the functioning of the website (default settings);
- View the complete list of cookies with the specific indication of the name and the function detected;
- Accept and indicate the application of cookies identified and divided by category (e.g. marketing cookies).

Finally, the site contains plugins for direct access to the Instagram and Facebook pages of the data controller.