

## PRIVACY POLICY

(pursuant to Article 13 Regulation (EU) 2016/679 - 'GDPR')

The site [www.briccodeiguazzi.it](http://www.briccodeiguazzi.it) (hereinafter '**Site**') is owned by Società Agricola Le Tenute del Leone Alato S.p.A. (VAT No. 01376530323), with registered office in Via Trento, 8 34132 Trieste TS.

With this Privacy Policy, Società Agricola Le Tenute del Leone Alato S.p.A. informs each user of the Site (hereinafter the '**Data Subject**') that the data provided when accessing the Site and interacting with it will be processed in compliance with the provisions set forth below on the processing of personal data.

### 1. Data Controller

The data controller is Società Agricola Le Tenute del Leone Alato S.p.A. (VAT No. 01376530323) with registered office in Via Trento, 8 34132 Trieste TS and Trieste Register of Companies no. REA (economic and administrative index): TS – 209974 e-mail: [privacy@leonealato.net](mailto:privacy@leonealato.net) (hereinafter referred to as the '**Data Controller**').

### 2. Nature of data processed

The personal data of Data Subjects are processed. Personal data means any information relating to a natural person, identified or identifiable even indirectly by reference to any other information (the '**Data**').

In particular, the Data that may be collected are as follows:

- Contact Data: name, surname, physical address and e-mail.
- Other Data: if you decide to provide it, telephone contact.

Società Agricola Le Tenute del Leone Alato S.p.A., through the Site, also collects and records the Data Subject's browsing data, and in particular the IP address, which allow access to the Site as well as browsing on the same and are used in an anonymous and aggregated form for statistical purposes and to verify the proper functioning of the Site.

### 3. Purpose of processing

The processing is carried out using manual, computerised and telematic tools with logics strictly related to the purposes and, in any case, in such a way as to guarantee the security and confidentiality of the Data in compliance with the regulations in force, and is aimed at:

- A) sending answers to the requests of the Data Subject by sending an e-mail to the address indicated in the '**Contacts**' section of the Site;
- B) the fulfilment of obligations laid down by law, regulations, EU legislation or an order of the Authority;
- C) the exercise of the Data Controller's rights, e.g. the right of defence in court.

#### **4. Legal basis for processing**

The processing of Data for the purpose referred to in Article 3 letter A) above is necessary for the pursuit of the legitimate interest of the Data Controller in responding to any requests from customers pursuant to Article 6 (1) (f) of the GDPR.

The processing of Data for the purpose referred to in Article 3 letter B) above is necessary to fulfil a legal obligation to which the Data Controller is subject pursuant to Article 6 (1) (c) of the GDPR.

The processing of Data for the purpose referred to in Article 3 letter C) above is necessary for the pursuit of the legitimate interest of the Data Controller to protect its rights pursuant to Article 6 (1) (f) of the GDPR.

#### **5. Recipients of the Data**

The Data processed by the Data Controller will not be disseminated, i.e. it will not be disclosed to unspecified persons.

The Data may, on the other hand, be disclosed to employees of the Data Controller and to certain external parties that collaborate with it, within the limits of the purposes set out in this policy. Lastly, Data may be communicated to the subjects entitled to access them by virtue of legal provisions, regulations and rules.

The Data shall only be processed by persons expressly authorised by the Data Controller or by companies acting as Data Processors, on behalf of the Data Controller, and who have signed a specific contract regulating the processing entrusted to them and their data protection obligations.

Individuals acting as Data Processors include:

- IT service providers.

Furthermore, the Data collected may be communicated to public or private entities for the fulfilment of legal obligations.

#### **6. Retention period**

Data are kept only for the time necessary to achieve the purposes for which they were collected and to fulfil the legal obligations imposed for the same purposes. In any case, the Data will not be processed for that purpose whose retention period has expired.

For the sake of completeness, the retention times are outlined below in relation to the different purposes listed above:

- to respond to the Data Subject's requests by sending e-mails to the address in the 'Contacts' section of the Site: the Data will be processed for the time necessary to satisfy the question and/or request;

At the end of the period of Data Processing, the Data shall be deleted or permanently anonymised.

#### **7. Option or obligation to provide Data and consequences of failure to provide Data**

The provision of Data is not compulsory, but failure to provide it will make it impossible for Data Subjects to use the services of the Site.

The provision of Data for the purpose referred to in point 3 letter A) is optional. However, failure to provide consent means it will be impossible to receive a response to any requests.

## **8. Rights of the Data Subject**

In relation to the Data subject to the processing referred to in this policy, the Data Subject has the right at any time of:

- Access: the Data Subject has the right to obtain from the Data Controller confirmation as to whether or not Data relating to him/her are being processed and, to obtain access to the Data and the information referred to in Article 15 of the GDPR, in which case the Data Controller shall provide a copy of the Data being processed. Should the Data Subject request further copies, the Data Controller reserves the right to charge a reasonable fee based on administrative costs;
- Rectification and addition (Article 16 GDPR): the Data Subject has the right to obtain from the Data Controller the rectification of inaccurate Data concerning him/her without undue delay. Taking into account the purposes of the Processing, the Data Subject has the right to supplement incomplete Personal Data, also by providing a supplementary statement;
- Erasure: the Data Subject has the right to obtain from the Data Controller the erasure of the Data concerning him/her without undue delay and the Data Controller has the obligation to erase the Data without undue delay, if one of the grounds set out in Article 17 of the GDPR applies;
- Restriction: the Data Subject has the right to obtain from the Data Controller restriction of processing when one of the cases referred to in Article 18 of the GDPR occurs. If the processing is restricted, the Data are processed, except for storage, only with the consent of the Data Subject or for the establishment, exercise or defence of legal claims or to protect the rights of another natural or legal person or for reasons of substantial public interest of the Union or of a Member State;
- Data portability (Article 20 GDPR);
- Right to object (Article 21 GDPR): The Data Subject has the right to object at any time, for reasons relating to his/her particular situation, to the processing of Data relating to him/her pursuant to Article 6 (1) (f) of the GDPR, in which case, the Data Controller shall refrain from further processing the Data unless the Data Controller demonstrates the existence of compelling legitimate grounds for processing which override the interests, rights and freedoms of the Data Subject or for the establishment, exercise or defence of legal claims;
- Withdrawal of consent (Article 7 (3) GDPR): The Data Subject has the right to withdraw his/her consent at any time. The withdrawal of consent does not affect the lawfulness of processing based on consent before withdrawal.

The Data Controller shall provide the Data Subject with information regarding the action taken with respect to a request made by him/her without undue delay and, in any event, no later than one month after receipt of the request. This period may be extended by two months if necessary, taking into account the complexity and the number of requests. The Data Controller shall inform the Data Subject of such extension and the reasons for the delay, within one month of receipt of the request. If the Data Subject submits a request by electronic means, the information shall be provided, where possible, by electronic means, unless otherwise specified by the Data Subject.

#### **9. Methods of exercising rights**

The Data Subject may exercise his/her rights at any time by sending:

- a registered letter with acknowledgement of receipt to Società Agricola Le Tenute del Leone Alato S.p.A., at the registered office in Via Trento, 8, 34132 - Trieste TS;
- an e-mail to [privacy@leonealato.net](mailto:privacy@leonealato.net)

#### **10. Complaint**

The Data Subject also has the right to lodge a complaint with a supervisory authority. For Italy, the supervisory authority is the Italian Data Protection Authority, whose contact details are available at [www.garanteprivacy.it](http://www.garanteprivacy.it).

#### **11. Privacy Policy updates**

This Privacy Policy is subject to occasional revision. If any changes are introduced to the processing, Società Agricola Le Tenute del Leone Alato S.p.A. will update this Privacy Policy. Where required by the applicable legislation, the Data Subject shall be entitled to give his/her consent to any new processing. In case of refusal, the Data Subject's data shall not be processed according to the changes set out in the Privacy Policy.

Last update

06.06.2023