

## PRIVACY POLICY ON CONTACTS AND MARKETING

### Information document on data treatment – Information document pursuant to and for the purposes of Article 13, Legislative Decree of 30 June 2003, No. 196

In compliance with Legislative Decree 30 June 2003 No. 196 (Privacy Code) and subsequent changes, we would like to kindly provide you with the necessary information regarding the processing of personal data supplied by you. The information must not be considered valid for other websites that may be consulted through links on the domain owner's Internet sites, which is not to be considered in any way responsible for third party websites. This is an information document drafted pursuant to [Article 13 of the legislative decree No. 196/2003 - Code regarding the protection of personal data](#). The information document is also based on the Recommendation No. 2/2001 that the European authorities for the protection of personal data, gathered in the Group formed pursuant to [Article 29 of Directive No. 95/46/CE](#), adopted on May 17<sup>th</sup>, 2001, in order to identify certain minimum requirements for the collection of personal data on-line, and in particular the methods, timing and nature of the information that the data controllers must provide to users when they connect to website pages, regardless of the purposes of the connection, as well as the provisions of Directive 2002/58/EC, as updated by Directive 2009/136 /EC, on the subject of cookies and the provision of the Authority "Identification of the simplified procedures for the information and the acquisition of consent for the use of cookies - 8 May 2014 (Published in the Official Gazette No. 126 of 3 June 2014)" and subsequent clarifications.

1. **THE DATA CONTROLLER ["HOLDER" OF DATA PROCESSING]**, pursuant to [Article 28](#) of the Code regarding the protection of personal data, is **Boffi spa** Via Oberdan, 70 - 20823 Lentate sul Seveso (MB), in the person of the pro-tempore legal representative.

**THE DATA PROCESSOR [PARTY RESPONSIBLE FOR DATA PROCESSING]**, pursuant to [Article 29](#) of the Code regarding the protection of personal data, is, among others, Dr. A. Loria at the aforementioned Boffi spa, **De Padova Srl, company with sole shareholder**, Strada Padana Superiore 280, 20090 Vimodrone (MI), **Boffi Trade srl** Via Solferino 11, 20121 Milan (MI) and **MA/U Studio srl** via Santa Cecilia, 7 20122 Milan and **Boffi Barberini Srl** Via Margutta 21/22, 00187 Rome (RM), Italy

### LOCATION OF DATA PROCESSING AND TREATMENT

The processing and actions related to the web services of this website, (physically placed "hosted" at a third party) are carried out at the company headquarters, the data controller, and are only handled by its own consultants and collaborators, in charge of processing, or by any external subjects for maintenance operations or updating of website pages.

**2.TYPE OF DATA PROCESSED** Personal and ID data. Personal information, any information relating to an individual, identified or identifiable, even indirectly, by reference to any other information, including a personal identification number; Identification data, personal data that allow for the direct identification of the interested party (such as but not limited to name, surname, date of birth, address, email address, phone number, etc.).

**Data voluntarily provided by the user** Optional, explicit and voluntary sending of e-mail to the addresses listed on this site and/or filling in *forms* for data collection, involves the subsequent acquisition of the sender's address, necessary to respond to requests, as well as any other personal data included.

**Data of minors.** Minors may not provide personal data. The Data Controller shall not be in any way responsible for any false statements that should be provided by the minor and, in any case, if the Controller ascertains the falsity of the declaration, he will immediately delete any personal data and any material acquired. The Data Controller will facilitate to the person exercising the parental authority or the legal guardian, the requests concerning the personal data of the minors, pursuant to Articles 7, 8, 9 and 10 of the Privacy Code.

**Third party data.** If you provide us with personal data of third parties (e.g. family members, and other interested parties in general), you must ensure that such third parties are informed and have consented, if necessary, to the use of data as described in the information document herein.

### 3.PURPOSE OF DATA PROCESSING

Personal data voluntarily provided in the filling out of data collection *forms*, and/or by sending e-mails, will be processed for the following purposes:

**A)** Management of contact requests, sending information requested by you and related administrative-accounting activities.

**B)** Possible receipt of communication material, for direct marketing activities, newsletters, market researches or other sample searches and sale via automated electronic mail, MMS or SMS messages or other types, as well as through telephone calls and use of paper mail, of material information on products from BOFFI, DE PADOVA, and MA/U Studio, for the survey of satisfaction, promotional, commercial and advertising material or inherent events and initiatives by the Data controller, even through the companies appointed as Data Processors (De Padova Srl, single shareholder company, Boffi Trade srl MA/U Studio srl, Boffi Barberini srl);

The data will be entered in the company CRM. The data controller, in order to compare and possibly improve the results of communication material, uses systems for sending newsletters and promotional communications with reports.

As a result to the aforementioned reports, the Data Controller will be able to understand, for example: the number of readers, openings, individual "clickers" and clicks; the devices and operating systems used to read the communication material; the detail on the activity of individual users; the details of the emails sent, e-mails delivered or not, of those forwarded. All these data are used for the purpose of comparing, and possibly improving, the results of communications.

#### **4. PROCESSING METHODS – STORAGE AND RETENTION**

Processing will be carried out automatically and manually, using methods and tools aimed at ensuring the maximum security and confidentiality, by individuals specifically appointed for, in compliance with the requirements of Article 31 et seq. Legislative Decree 196/03. The data will be kept for a period not exceeding the purposes for which the data were collected and subsequently processed.

#### **5. SCOPE OF COMMUNICATION AND DISSEMINATION**

The data, subject to the processing described herein, will not be disseminated and may be disclosed to companies contractually linked to **Boffi spa**, abroad and within the European Union, in accordance with and within the limits of Art. 42 of Legislative Decree. No. 196/2003. Personal data may be transferred abroad in countries outside the EU, and within the limits provided by Articles 43 and 44 letter b) of the Decree No. 196/2003, in order to comply with contractual obligations or related purposes. The data may be disclosed to third parties in the following categories: - suppliers of services for the management of the information system used by **Boffi spa** and telecommunications networks (including e-mails and platforms); - studies or companies providing assistance and consultancy; - Associates, subsidiaries or companies contractually linked to **Boffi spa**, also belonging to the Boffi group, and/or as part of its distribution network (such as branches, importers, distributors, forwarders, etc.), even established in countries outside the EU; - authorities competent for the carrying out the relevant laws and/or regulations of public bodies, on request.

The subjects belonging to the above categories are considered Data processors, or they act independently as separate Data controllers. The list of the data processors is constantly updated and available at the headquarters of **Boffi spa** Via Oberdan, 70-20823 Lentate sul Seveso, Italy.

#### **6. NATURE OF PROVISION AND REFUSAL**

The provision of data for the purposes referred to in point A) is optional, however necessary. Any refusal to provide the necessary data with respect to point A) shall make it impossible to carry out closely related and instrumental activities, for example obtaining what is requested or to use the services of the data controller. The provision and consent to the processing for the purposes referred to in points B) is optional. The refusal of consent for the purposes described in points B) above, however, does not imply any negative consequence with regard to the purposes referred to in point A)

#### **7. RIGHTS OF INTERESTED PARTIES**

You have the right to make use of your rights as expressed in articles 7, 8, 9 and 10 of the Italian legislative Decree 30 June 2003 No. 196, by contacting the Data Controller or the Data Processor, sending an e-mail to [privacy@boffi.com](mailto:privacy@boffi.com). You have the right, at any time, to obtain confirmation of the existence of data and to know the content and origin, verify its accuracy or request its integration or updating, or correction (Article 7 of the Code concerning the protection of personal data). For the purposes of the aforementioned article, the user shall have the right to request cancellation, transformation into anonymous form or blocking of data processed in violation of the law, and to oppose in any case, for legitimate reasons, to their processing. In order to stop receiving automated direct marketing communications (email, SMS, MMS), you can simply write at any time an e-mail to [privacy@boffi.com](mailto:privacy@boffi.com) with the subject line: "cancellation from automated mail" [in Italian: "cancellazione da automatizzato"] or use our systems of automatic cancellation provided only for e-mail, and you will not be disturbed any more. To stop receiving direct traditional marketing communications (phone calls with operator, paper mail), you can simply write at any time an e-mail to [privacy@boffi.com](mailto:privacy@boffi.com) with the subject line "cancellation from traditional marketing" [In Italian: "cancellazione da tradizionale"], and you will not be further disturbed.

#### **8. CHANGES TO PRIVACY POLICY STATEMENT**

The Data controller reserves the right to modify, update, add or remove parts of the privacy policy statement herein at his/her own discretion and at any time. The interested party shall periodically verify these possible changes. In order to facilitate this verification, privacy statement shall contain the date when updating took place. The use of the site, after the publication of the aforesaid changes, shall constitute acceptance of these changes.

Updated on: April 4<sup>th</sup>, 2018

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