

## POLICY

Art. 13 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016

Under Article 13 of the General Data Protection Regulation – Regulation (EU) 2016/679 of the European Parliament and Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (the “**GDPR**”), it is our responsibility to provide you with certain information about the processing of personal data supplied in connection with your relationship with SOCIETA' AGRICOLA CORTE POLFRANCESCHI SRL.

<b>Data Controller</b>
The Data Controller is SOCIETA' AGRICOLA CORTE POLFRANCESCHI SRL headquartered at Via Meucci snc, 37045 Legnago (VR) Italy, Tel +39 045 772 5630 VAT no. and tax code: 04039920238, Certified email address: ammin.cortepolfranceschi@pec.it (the “ <b>Data Controller</b> ” or “ <b>Company</b> ”).
“TENUTA VILLA BELLINI” is a trademark registered by the CONTROLLER.

### Purposes for which your consent is not required

<b>Purpose</b>	<b>Legal basis for the processing</b>
Management of the archiving/conservation of data, the sending of information and communications, including online communications, requested by you on the company’s website, and the sending of documents pertaining to your relations with the Company.	(Art. 6(1) c), GDPR) Processing necessary to fulfil a legal obligation of the Data Controller (Art. 6(1) f), GDPR) Processing necessary to pursue a legitimate interest of the Data Controller in relation to the organisation and administration of its business.

### Purposes for which your consent is required

<b>Purpose</b>	<b>Legal basis for the processing</b>
Statistics, commercial, promotional and marketing activities including the supply of material and information about new products, promotions, discounts, incentives and other services of interest to you, by the Data Controller, including the sending of printed and/or online material in the form of newsletters (emails, texts, video messages or instant messages); the sending of information and invitations to events organised or sponsored by the Company.	(Art. 6(1) a), GDPR) Consent
Market research	(Art. 6(1) a), GDPR) Consent

**Your personal data may be disclosed to employees and/or collaborators of the Data Controller who have been duly appointed as authorised data processors and trained on the processing of such data, or data coordinators (if external to the Company).**

Period of conservation of the data.

<b>Personal data and documents</b>	<b>Conservation period or criteria used to determine it</b>
General details and documents pertaining to the relationship with the Company	For the period necessary to pursue the purposes of the processing and also subsequently, where permitted by law, for administrative and accounting purposes, or to protect or enforce the rights of the Data Controller, as necessary

Rights as provided for in the GDPR pertaining to the processing of data, which you may request from the Data Controller.

<b>Right</b>	<b>Description</b>	<b>Mode of exercising the right</b>
Right to revoke consent (Art. 13(2) c)	You have the right to revoke consent to the processing operations for which consent is required, without affecting the legitimacy of the processing based on consent that was completed before the time of revocation.	Forms on website
Right of access to data (Art. 15)	You may request a) the purposes of the processing; b) the categories of personal data concerned; c) the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations; d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period; e) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing; f) the right to lodge a complaint with a supervisory authority; g) where the personal data are not collected from the data subject, any available information as to their source; h) the existence of automated decisionmaking, including profiling, referred to in Article 22(1) and (4), and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject. You have the right to request a copy of the personal data that have been processed.	Forms on website

<b>Right</b>	<b>Description</b>	<b>Mode of exercising the right</b>
Right of rectification (Art. 16)	You have the right to obtain the rectification of inaccurate personal data concerning you, and to have incomplete personal data completed.	Forms on website
Right to be forgotten (Art. 17)	You have the right to obtain from the Data Controller the erasure of your personal data if that data is no longer necessary for the purpose for which it was collected or otherwise processed.	Forms on website
Right to restriction of processing (Art. 18)	You have the right to obtain from the Controller restriction of processing when you have contested the accuracy of the personal data (for a period enabling the Controller to verify the accuracy of the personal data) or if the processing is unlawful but you oppose the erasure of the personal data and request the restriction of their use instead; or if they are necessary for the establishment, exercise or defence of a right in legal proceedings, while they are no longer necessary to the Data Controller.	Forms on website
Right to data portability (Art. 20)	You have the right to receive, in a structured, commonly used and machine-readable format, personal data that relates to you, and you have the right to transmit that data to another data controller, if the processing: (i) is based on consent, (ii) on a contract, and (iii) if the processing is carried out with automated means, unless the processing is necessary to carry out a task in the public interest or is connected to the exercise of public powers and such transmission does not infringe the right of others.	The right may be exercised by starting the relevant procedure with the Data Controller
Right to object (Art. 21)	You have the right to object at any time to the processing of all or part of your personal data if the processing is carried out in the pursuit of a legitimate interest of the Data Controller or for the purposes of direct marketing.	Forms on website
Right to lodge a complaint with a Supervisory Authority (Art. 77)	You may lodge a complaint with a Supervisory Authority if you consider that the data processing infringes the GDPR.	

The exercise of the above rights is subject to the limitations, rules and procedures laid down in the GDPR, which the Data Subject must be familiar with, and implement. In accordance with the provisions of Article 12 (3) the Data Controller will provide the data subject with information on the actions taken without unjustified delay, no later than one month from receipt of the request. This period may be extended by two months if necessary, taking into account the complexity, and number of the requests. The Data Controller will inform the data subject of the extension, and of the reasons for the delay, within one month from receiving the request.

The personal data you provide may be processed by the Data Controller with or without the use of automated means.

Please also note that the communication of your personal data for the obligatory purposes is a legal or contractual obligation, or is a necessary requirement for the fulfilment of a contract. You are therefore obligated to provide your personal details because otherwise it will not be possible to manage the relationship with the Company.