Information on newsletters and navigation of the website according to legislation art. 13 and 14 of European Regulations n.16/679 and national legislation on data protection.

PANZERI DIFFUSION SRL, as owner of personal data, with headquarters in Malnate (VA), Via Brodolini, 30 VAT n. 02879900120, with this informative circular, wishes to inform physical people who wish to receive newsletters of the brands belonging to PANZERI DIFFUSION srl and navigate the website, according to legislation art. 13 and 14 of REG EU 679/16 "European Regulations on data protection", and national legislation on data protection.

## **DATA INVOLVED**

The data used is personal data and contact data given by the involved parties in the relative sections of the website (name, surname, complete address, email, telephone number).

# PURPOSE AND CONDITIONS THAT MAKE THE USE OF PERSONAL DATA LAWFUL

The use and purposes that make the use of personal data lawful are:

- requests of information forwarded by the interested parties via the website/email,
- Consignment of coupons, discounts, promotions and services reserved for those people who wish to use them,
- 3. with the consent of the interested parties, promotional-informational activities to send newsletters (news, tutorials, trends, and when applicable invites and events, course promotions, coupons, discounts, and promotions) of the brands belonging to PANZERI DIFFUSION srl with automized contact methods (email) and traditional contact methods (letters, phone calls via an operator),
- 4. with the consent of the interested parties, promotional-informational activities via instant messaging services such as WhatsApp or sms or other services,
- 5. site navigation (for details on the cookie policy, see the specific section) and access to the Reserved Area
- 6. ascertain, execute or defend the rights of the Owner in the case of dispute or out-of-court and/or in court resolution if necessary.

# **LEGISLATIVE MOTIVATION**

The use of personal data is connected to the requests of the parties involved

For purpose 6) the use of data is necessary for the pursuit of the interests of the Owner

# Compulsoriness of providing data

The lack of consent to the processing of data for purposes 1, 2, 5 and 6 makes it impossible to carry out the requested service; for purpose 2 on the basis of the initiative it may not be compulsory to possess the data of the interested party. For purposes 3 and 4 the lack of consent does not affect the carrying out of the requested service.

#### **HOW DATA IS USED**

Personal data will be used for purposes 1-4 and 6) via manual or automatic systems including databases, lists and directories suitable for storage, management and communication of data, in the methods and limits necessary to fulfil the pre-empted purposes.

For purpose 5) no personal data will be acquired from the website.

PANZERI DIFFUSION SRL has taken suitable safety measures to protect the data of physical people such as: Firewalls, antivirus packages, back-ups. The data will be used exclusively by authorised personnel within PANZERI DIFFUSION SRL, according to the purpose of using such data.

# DATA OF MINORS UNDER THE AGE OF 16

Minors under the age of 16 can navigate the website freely. What they cannot do is: forward requests for information through the website/email, requests for coupons, requests to receive the newsletter. For such activities, it is necessary to register on the website giving an email which is only allowed for persons over the age of 16. No one under that age can register, except certain cases where the minor has obtained consent via their parents or a legal guardian. Minors cannot in any case register a telephone number on the website.

#### WHO RECEIVES THE DATA

Personal data used by the company for purposes 1-4 and 6) will not be shared, or rather, will not be made known to undefined parties, in any shape or form, including being made available for consultation. The data can be communicated to employees of the company and certain external collaborators, respecting the indicated purposes. Particularly, employees/collaborators who, based on their roles and tasks, are allowed to deal with personal data, limited to their competences and in conformity with the instructions given by the company. Certain technicians or external collaborators hired by the company for these services could access this information (for the purpose of assistance on SW applications, IT networks and connectivity). Finally, the data can be communicated to parties who may lawfully access this data for legal, regulatory, or European regulation purposes. For purpose 5), no personal data is acquired by the website.

#### **SHARING OF DATA**

Even if at the moment all the people who deal with personal data on behalf of PANZERI DIFFUSION srl operate as external managers of such data are within the EU, in the future it could be necessary to transfer such data to parties outside the EU, in countries which do not guarantee a suitable level of protection for personal data according to Data Protection/European Regulations RE. EU 679/2016 on data protection. Panzeri Diffusion will only transfer data outside of the EU after having taken the necessary precautions according to Data Protection and European Regulations and after having obtained the necessary guarantees and consent of the involved parties.

### STORAGE OF DATA

For the purposes:

- 1-2) the data is stored for 6 months after the request, for statistical purposes;
- 3-4) the data is stored until the revocation of consent and/or 2 years after having opened a newsletter, without affecting the lawfulness of the preceding use of data;
- 5) no personal data of the interested parties are acquired by the website.
- 6) for the entire duration of the dispute and/or procedure, until the exhaustion of the available terms for legal protection and/or appeals. Once the terms for data storage have terminated, all data will be destroyed or made anonymous, compatibly with the technical procedures for deletion and back-up.

#### **PERSONAL RIGHTS**

According to legislation art. 7 of D. Lgs. 196/2003 and articles 15 and 22 of national regulations, you have the right to:

- ask for confirmation of the existence of personal data;
- obtain information regarding the purposes, the categories of personal data or the categories of recipients to whom data has been or will be communicated and, when possible, for how long it will be stored;

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## INFORMATION ON NEWSLETTERS AND NAVIGATION OF THE WEBSITE

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# ask for the rectification or deletion of data; obtain limitations on the use of the data:

- obtain the portability of the data, in other words, receive the data from the owner of the data, in a structured format, for common use and readable via an automatic device, and transmit these to another owner of data without impediments;
- be opposed to the use of data at any time, even if for direct marketing purposes;
- be opposed to an automatic decision regarding physical people, including profiling
- ask the owner of the data to access personal data and the rectification or deletion of such data and be opposed to its use, as well as the right to the portability of such data;
- revoke the consent at any time without affecting the lawfulness of the use of data based on the previously given consent.

These rights may be carried out by writing to privacy@z-oneconcept.com, specify the subject of the request, the right requested by interested party and by attaching a photocopy of an I.D card which validates the request.

Your consent to the use of personal data may be revoked at any time, by writing to privacy@z-oneconcept.com.

#### **DISPUTES**

The interested party has the right to make any claims to their State of residence. For more information on filing complaints, please visit: https://goo.gl/GLbTN9

#### PRIVACY CONTACT

For any clarification, information, need to exercise rights, etc., it is possible to contact our Privacy contact for Panzeri Diffusion SRL via email: privacy@z-oneconcept.com.

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