

## Website Privacy Policy

We hereby inform you that, pursuant to Article 13 of Legislative Decree 196/2003 (Privacy Code) and Article 13 of EU Regulation 2016/679 (General Data Protection Regulation – hereinafter referred to as “GDPR 2016/679”), which provide measures to protect individuals and other subjects with regard to the processing of personal data, the personal data you provide will be processed by our Company. The processing of personal data will comply with the above-mentioned regulations, adhering to the principles of lawfulness, fairness, transparency, and protection of confidentiality and rights, with specific reference to integrity, confidentiality, personal identity, and the right to personal data protection.

### 1. Data Controller

The Data Controller is BONACINA1889 S.r.l., with its registered office at Via S. Primo 19, 22040 Lurago d’Erba (CO), Italy. Contact e-mail for the Data Controller: [amministrazione@bonacina1889.it](mailto:amministrazione@bonacina1889.it)

### 2. Types of Data Collected

The provision of personal data is necessary for entering into contracts, their amendments, and any other relationships with the Company. The personal data collected include:

- a) Personal and contact information provided via the “Contact” page form.
- b) Professional details collected via the “Contact” page form.
- c) Cookies and browsing data.

### 3. Purpose of Data Processing

The User’s data are collected to allow the Data Controller to provide its services, specifically to contact the User following a request for information.

- a) Data requested in the contact form section of the website:  
*The website contains a section where users can contact the Company to request information. Personal data requested: Name, Surname, Email Address, Phone Number, Address, and Profession.*
- b) Viewing content from external platforms:  
*These services allow connection to and interaction with external platform content directly from the website pages. Even if the User does not use these services, they may still collect traffic data related to the pages where they are installed. Personal data requested: Email Address.*
- c) Browsing data implicitly transmitted through Internet communication protocols:  
*The IT systems and software procedures used for this website’s operation acquire, during normal use, some personal data whose transmission is implicit in the use of Internet communication protocols. This information is not collected to be associated with identified individuals but could, through processing and association with data held by third parties, identify users. The site includes a Cookie-bot listing cookies with specific details. Personal data requested: E-mail Address.*

### 4. Nature of Provision and Legal Basis for Processing

The provision of personal data is strictly optional but, in some cases, necessary for processing in relation to the counterparty. The personal data indicated on these pages are processed based on the User’s consent. Specifically, the User’s consent is provided:

- a) By voluntarily submitting messages via the contact form;
- b) By using the “Advanced Cookie Settings” banner to enable or disable specific types of cookies.

### 5. Processing Methods

Processing will be carried out in an automated and/or manual form, using methods and tools that comply with the security measures outlined in Article 32 of GDPR 2016/679, by personnel specifically appointed under Article 29

of GDPR 2016/679. Appropriate security measures are implemented to ensure the confidentiality of the data subjects and to prevent unauthorized access or disclosure.

## 6. Retention Period

In compliance with the principles of lawfulness, purpose limitation, and data minimization (as per Article 5 of GDPR 2016/679), personal data will be retained for a period not exceeding the achievement of the purposes for which they were collected and processed (normally 10 years) while respecting legal timeframes. If the processing is based on the User's consent, personal data may be retained until such consent is revoked. Furthermore, the Controller may be required to retain personal data for a longer period due to legal obligations or authority orders. At the end of the retention period, personal data will be deleted. After this period, rights of access, deletion, rectification, and data portability can no longer be exercised.

## 7. Scope of Communication and Dissemination

The collected data will not be disseminated. They may, however, be communicated to the following categories of recipients:

- Public entities as required by law (e.g., welfare and financial authorities);
- Public or private entities when communication is necessary for the Company's operations;
- Consultants strictly necessary for professional duties on behalf of the Company.

Individuals collaborating with BONACINA1889 S.r.l. who access personal data are appointed as Data Processors under specific mandates that outline the security measures required. The Company reserves the right to terminate collaborations if these conditions are not met.

## 8. Transfer of Data Outside the EU

The Data Controller does not transfer personal data outside the EU. However, the Company may use cloud services, in which case service providers will be selected among those offering adequate guarantees in accordance with Article 46 of GDPR 2016/679.

## 9. Data Subject Rights

At any time, you may exercise the following rights under Article 7 of the Privacy Code and Articles 15-22 of GDPR 2016/679:

- Obtain information on:
  - o Data origin;
  - o Processing purposes;
  - o Categories of personal data;
  - o Recipients or categories of recipients to whom personal data were or will be disclosed;
  - o Retention periods;
- Obtain:
  - o Data rectification;
  - o Data deletion;
  - o Processing limitation;
  - o Data portability in a structured, commonly used, and machine-readable format.
- Object to:
  - o Processing at any time, including for direct marketing purposes;
  - o Automated decision-making processes, including profiling.
- Lodge a complaint with the Data Protection Authority.

## 10. Additional Information

Further details on personal data processing can be requested at any time by contacting the Data Controller.

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## **11. Privacy Policy Updates**

The Data Controller reserves the right to modify this privacy policy at any time. Users are encouraged to check for updates periodically. Changes will be noted by the updated date at the end of this policy. Continued use of the website after such changes constitutes acceptance.