

# MARSILLI

## PRIVACY POLICY

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This privacy policy is in accordance with the GDPR – EU regulation 2016/679.

### WHO IS THE CONTROLLER OF PERSONAL DATA PROCESSING

Marsilli S.p.A (from here on referred to as the "Company"), with headquarters in Italy, Castelleone (CR), Via Per Ripalta Arpina 14.

The Company is the controller of all personal data collected.

The list of persons in charge of the processing is available at the above-mentioned headquarters.

### CONTACTS

To request the contact details of the Company in charge of the processing, please send an email to the following address: [privacy@marsilli.it](mailto:privacy@marsilli.it)

### WHICH PERSONAL DATA CAN BE COLLECTED

The following categories of personal data concerning you can be collected:

- Contact details – information relative to your name, place and date of birth, address, phone number, cell phone number, email address.
- Interests – information provided by yourself regarding product-related interests.

### WAYS PERSONAL DATA IS COLLECTED

The Company collects and processes your personal data in the following situations:

- to purchase our products;
- when you reply to one of our marketing campaigns, for example if you fill in a reply card;
- When other companies within the same group or commercial partners legitimately transfer your personal data to us.

Please help us keep your data complete and up-to-date by promptly notifying us if there are any changes to your personal information.

### PURPOSES OF PERSONAL DATA USE

a) Establishment and execution of the contractual relationships and resulting obligations, including communication relative to services (for example to execute the purchase orders)

The Company can process your contact data to establish and execute possible contractual relationships, to provide requested services and to give feedback following claims and complaints.

The Company can process your contact data, in particular your email, to provide you with information regarding the service to be provided.

Prerequisite of the processing: fulfilment of the contractual obligations.

The provision of the data is mandatory to manage the contractual relationship; lacking such data, we cannot carry it out.

b) Marketing to meet your requirements

The Company could process your contact data for marketing and advertising purposes, to inform you about sales events, by means of automated (email, sms and other messaging tools) and traditional contact systems (for example by phone or mail) or to carry out market research and statistical surveys, provided you give your specific consent.

The Company could also process your contact details, your interests and other personal data you wish to provide to send you commercial communications.

Prerequisite of the processing: consent

The non-conferment of said consent will not have consequences on the contractual relationship.

Consent can be revoked at any time.

c) Legal disputes, compliance to legally binding requirements to fulfil a legal obligation.

The Company collects your contact data to fulfil a legal obligation and/or for defence of legal claims.

Prerequisite of the processing: legal obligations to which the Company must comply.

## **HOW WE RETAIN AND PROTECT PERSONAL DATA**

All of your personal data is stored in our archive, both digital and hard copy, or in the archive of our service providers and are accessible and useable according to our standards and IT security policies.

The personnel authorized to process your data in compliance with the privacy policy is adequately trained and authorized in function of the activities to be carried out and the tasks assigned.

The Company applies all safety measures necessary to guarantee safety, confidentiality, integrity and personal data availability by means of a ISO/IEC 27001 security system.

## **HOW LONG THE INFORMATION IS RETAINED**

Your personal data is stored for no longer than it is necessary for the purpose for which they are processed or for other legitimate purposes. Therefore, if your data has been processed for two separate purposes, your data is stored for a period of time equivalent to the purpose with the longer term. However, your personal data will no longer be processed for the purpose with the shorter term.

The access to your personal data is limited to personnel who need to process them for relevant purposes.

When your personal data is no longer necessary, or when there is no longer a legal prerequisite to retain it, it is irreversibly anonymised (in this case it can be stored) or securely destroyed.

Hereunder are the periods for the retention of your data in relation to the different above-mentioned purposes:

a) Fulfilment of the contractual obligations: the data processed to fulfil any contractual obligation can be retained for the entire duration of the contract, and in any case no longer than 10 years, in order to verify possible outstanding matters including accounting documents.

b Marketing purposes: data processed for marketing purposes can be retained until the consent has been revoked. Every marketing activity provides the possibility to revoke consent.

c In case of legal disputes: if it is necessary to defend ourselves, act or submit a claim against yourself or third parties, we could retain the personal information we consider reasonably necessary to process for such reasons, for the possible duration of said claim.

## **WHO CAN WE SHARE YOUR PERSONAL DATA WITH**

Your personal data can be accessed by salespersons, duly authorized employees and also external suppliers, who support the services provided, and who will be named responsible for the processing of your data , if necessary.

Your data can also be transferred to companies within the Marsilli group, also outside the EU; in this case the owner will verify the respect of the articles 44 and 45 of the GDPR.

## **DATA PROTECTION RIGHTS AND THE RIGHT TO SUBMIT A CLAIM**

In accordance with the GDPR, the Company would also like to inform you that – you may exercise the following rights:

- access to your personal data;
- a copy of the personal data you provided (portability);
- correct the data in the Company's possession;
- delete any data for which there is no longer a legal prerequisite for its processing;
- revoke your consent if the processing is based on consent or if it is directly related to a marketing activity;
- limit the way your personal data is processed, within the limits required by the regulations on the protection of personal data;
- opposition to the processing if included in the applicable regulation.

The exercise of these rights is subject to a few exceptions aimed to safeguard public interests (for example to prevent or identify criminals) and our interests (for example preservation of professional secrecy). If you exercise any of the above-mentioned rights, it will be our duty to verify that you are entitled to exercise this right and we will provide feedback, generally, within a month.

For possible claims and reports you have the right to contact the control authorities.

## **CHANGES TO THIS PRIVACY POLICY**

The data controller reserves the right to make changes to this privacy policy at any time, giving notice about it on the website: [www.marsilli.com](http://www.marsilli.com).

If the changes made pertain to processing, where the legal basis is consent, the data controller will re-collect the users consent, if necessary.