CUSTOMER PRIVACY POLICY

Information notice pursuant to Article 13 Regulation (EU) 2016/679 (GDPR)

In compliance with the provisions of Article 13 Regulation (EU) 2016/679 (GDPR), we provide you the necessary information regarding the processing of your personal data.

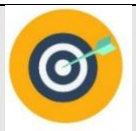
1. Personal Data Processed

Personal Data: (Definition) any information concerning an identified or identifiable natural person (data subject). An identifiable person is a natural person who can be identified directly or indirectly with particular reference to an identifier such as a name, an identification number, location data, an online identifier, or one or more features of his or her physical, physiological, genetic, mental, economic, cultural or social identity – art. 4, c. 1, n. 1 GDPR.

Categories of Personal Data processed: i) biographical data, contact data and the role held at the company of which the data subject belongs; ii) company name and tax code; iii) additional personal data that may be collected during the negotiation and/or conclusion and/or termination of the contractual relationship.

2. The **DATA CONTROLLER**, pursuant to artt. 4 and 24 of Reg. EU 2016/679, is **MARVON S.R.L.**, with registered office in 25078 – Vestone (BS), Via Gargnà n. 6, in the person of its pro-tempore Legal Representative.
The Data Controller's contacts are: phone +39 0365 81390; e-mail: privacy@marvon.com.

3. PURPOSE OF PROCESSING – LEGAL BASE – DATA RETENTION PERIOD – NATURE OF PROVISION

 ***Purpose of processing***	***Legal base***	***Data retention period***	***Nature of provision***
Purpose A) Carrying out negotiations and executing the contractual relationship. Fulfil obligations arising from applicable legislation including tax legislation.	*Contract* Obligations arising from the contract - art. 6 lett. b) GDPR. *Legal Obligation* The processing is necessary for compliance with a legal obligation to which the Data Controller is subject - art. 6 lett. c) GDPR.	Throughout the duration of the contract and for the following 10 years after its termination.	The provision of personal data is necessary for the performance of a contract to which the data subject is party or for the performance of pre-contractual measures taken at the request of the data subject.
Purpose B) Asserting and defending one's rights, including in the context of debt collection procedures against the person concerned or a third party in any litigation.	*Data Controller's legitimate interest* The processing is necessary for the pursuit of the Data Controller's legitimate interest - art. 6 lett. f) GDPR and whereas 47 GDPR.	Throughout the duration of the trial and until res judicata.	The provision of data is not compulsory, and the data subject may object to the processing.

Purpose of processing	*Legal base*	*Data retention period*	*Nature of provision*
Purpose C) Carrying out activities in connection with the sale of a company and business unit, acquisition, merger, demerger or other transformations and for the execution of such transactions	*Data Controller's legitimate interest* The processing is necessary for the pursuit of the Data Controller's legitimate interest - art. 6 lett. f) GDPR and whereas 47 GDPR	Throughout the operation.	The provision of data is not compulsory and the data subject may object to the processing.
Purpose D) Communicating to you information of a commercial nature, on products or services of the owner similar to those already purchased, including via our newsletter ("soft spam").	*Data Controller's legitimate interest* The processing is necessary for the pursuit of the Data Controller's legitimate interest, in developing relations with its customers and increasing the volume of requests and sales of products - art. 6 lett. f) GDPR and art. 130, par. 4 D.lgs. 196/2003	Until opposition (opt-out) | removal from mailing list	The provision of data is optional: if you object to the processing of your data, it will not be possible for the Data Controller to keep you constantly updated on offers and promotions of products similar to those you have already purchased.
Purpose E) Verify the security and commercial and financial reliability of its customers, and other contractual counterparties, prevent fraud and ensure the soundness of management and proper execution of business relations between the Data Controller and its customers, and other contractual counterparties.	*Data Controller's legitimate interest* The processing is necessary for the pursuit of the Data Controller's legitimate interest in verifying the commercial and financial security and reliability of its customers - art. 6 lett. f) GDPR	Throughout the operation	The provision of data is not compulsory and the data subject may object to the processing.

4. RECIPIENTS OR CATEGORIES OF RECIPIENTS OF THE DATA

The personal data provided will be communicated to employees or collaborators of the Data Controller who will process the data as authorised persons acting under the authority of the Data Controller (Art. 29 GDPR). In order to fulfil existing contracts with the Company or for related purposes, the personal data provided may be disclosed to recipients belonging to the following categories:

a. subjects that provide services for the management of the information system used by the Data Controller and telecommunications networks (including e-mail and the website);
b. firms or companies in the context of assistance and consultancy relations;

c. subjects with whom the Data Controller has concluded economic agreements;
d. firms or companies in the context of tax assistance and consultancy and administrative/accounting management relations;
e. competent authorities to fulfil legal obligations and/or provisions of public bodies, upon request;
f. company transferees, companies resulting from possible mergers, demergers or other transformation of the Data Controller - as autonomous data controllers.

The subjects belonging to the above-mentioned categories perform the function of data processor, or operate completely independently as separate data controllers. The list of any data processors is constantly updated and available at the Data Controller's head office.

5. DATA TRANSFER TO A THIRD COUNTRY

The personal data will not be transferred to non-EEA countries.

6. AUTOMATED PROCESS

We do not use decision-making processes based on automatic processing, including profiling.

7. DATA SUBJECTS' RIGHTS

You may assert your rights as expressed in Artt. 15 et seq. GDPR, by contacting the Data Controller at the e-mail at the contacts listed above. You have the right, at any time, to request access to your personal data (Art. 15), rectification (Art. 16), deletion of the same (Art. 17), restriction of processing (Art. 18). The Data Controller shall inform (Art. 19) each of the recipients to whom the personal data have been transmitted of any rectification or erasure or restriction of processing carried out. The Data Controller shall inform the data subject of these recipients if the data subject so requests. In the cases provided for, you have the right to the portability of your data (Art. 20), in which case they will be provided to you in a structured, commonly used and machine-readable format. You have the right to object (Art. 21), at any time, to the processing of your data based on legitimate interest by writing to the contact details above with the subject "objection" and in cases where the legal basis is consent, you have the right to revoke the consent given without prejudice to the lawfulness of the processing based on the consent before revocation.

In the event that he/she considers that the processing of personal data carried out by the Data Controller is in breach of the provisions of Regulation (EU) 2016/679, the data subject has the right to lodge a complaint with the Supervisory Authority, in particular in the Member State where he/she normally resides or works or in the place where the alleged breach of the Regulation occurred (Garante Privacy https://www.garanteprivacy.it/), or to take appropriate legal action.

8. NOTICE CHANGES

The Data Controller may change, modify, add or remove any part of this Privacy Policy at any time, unless it is necessary to obtain your consent where required. In order to facilitate the verification of any changes, the notice will contain an indication of the date on which the notice was updated.

THE DATA CONTROLLER
MARVON S.R.L.