



Armeria Piovanelli S.r.l.

Via C. Battisti, 19
25017 Lonato del Garda (BS)

INFORMATION NOTICE ON PERSONAL DATA PROCESSING ADDRESSED TO OUR CUSTOMERS

Pursuant to articles 13 and 14 of Regulation (EU) 2016/679 " on to the protection of natural persons with regard to the processing of personal data, as well as to the free movement of such data " (hereinafter referred to as "GDPR")

WHEREAS

- In accordance with art. 4, paragraph 1, point 7 of Regulation (EU) 2016/679 the "Data Controller" is the natural or legal person, the public authority, the agency or other body which, individually or together with others, determines the purposes and means of personal data processing;
- In accordance with art. 4, paragraph 1, point 1 of Regulation (EU) 2016/679 "Personal Data" means any information relating to an identified or identifiable natural person («data subject»);
- In compliance with art. 14, paragraph 3 of Regulation (EU) 2016/679 in the case of relationships between legal persons, any data subjects involved in the related processing will be provided with the information notice through the customer (legal person) at the time of the first communication with them.

NOW, THEREFORE

We inform you that the fulfillment of your order implies the need to process some information concerning natural persons.

We want, however, to reassure you about the handling of such information, which will be processed by *ARMERIA PIOVANELLI S.R.L.*, with registered office in *Via Cesare Battisti n. 19 25017 Lonato (BS)* VAT No. *00717140982*, Telephone number *+39 030 9130076*, e-mail address amministrazione@piovanelli.com, as **Data Controller**, in compliance with the fundamental rights and freedoms of the individual, as well as the provisions of the legislation on the protection of personal data.

DATA SOURCE AND TYPE OF DATA WE PROCESS

The management of your order implies the collection and processing of personal data, namely: identification (name, surname, e-mail address), administrative, accounting and tax ones as well as those related to any license including firearms license, directly referred to the customer (natural person) or, as regards identification and contact data, those referred to further data subjects (such as managers, directors, employees, contact persons, collaborators, etc.).

The data controller is obliged to update the daily operation register by noting the data of the natural person or the company with which the operation is performed and of the way in which the purchaser has demonstrated his personal identity.

These data are generally supplied by you within the scope of execution and performance of relationships with the data controller and are in any case processed according and in compliance with the principle of minimisation as well as the provisions on personal data processing and protection.

In order to accomplish your requests, the aforementioned data are essential: without prejudice to your right not to provide us with such information, however, in this latter case it may not be possible to carry out your order fulfillment, as requested by you, as for products or services subject to Public Safety laws and regulations.

The management of the newsletter implies the collection and processing of personal data, namely: identification ones (name, surname, mobile number). These data are generally supplied by you within the scope of execution and performance of relations with the data controller and are in any case processed according and in compliance with the principle of minimisation as well as the provisions on personal data processing and protection.

In order to accomplish your requests, the aforementioned data are essential to access to the newsletter service.

The Data Controller may process some personal data (within the limits of the contact details provided and the orders placed) so as to submit business proposals only in reference to products and services similar to those you have previously purchased.

PURPOSES OF PROCESSING

The data collected are used for the pursuit of purposes deemed operational and / or complementary to the activities statutory expressed and functional to the fulfillment of the current contractual or pre-contractual relationship with the Customer and this in relation to the products requested., namely:



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- Registration of the new Customer's personal data and operator's contact data in the management software.
- Fulfillment of public safety obligations.
- Internal communication aimed at supplying the product.
- Invoicing, accounting and financial statements issuing.
- Information messages and commercial communications delivery by electronic means (Whatsapp Business).
The newsletter is a service that the Company makes available so as to enable you to be always updated on commercial offers, publicity, cultural events offered or advertised by the data controller.

In the event that the data controller intends to further process personal data for a purpose other than that for which they were collected, he will provide the interested party with all necessary information in advance

The Data Controller will not carry out any profiling activities aimed at direct marketing.

LEGAL BASIS OF PROCESSING

The processing is carried out so as to perfect and fulfill a contract of which the Customer is a party or current pre-contractual measures between the Data Controller and the Customer, and having as their object the order relating to the supply of the product or the performance of the service.

In case it is provided by a sector-specific regulation (e.g. tax or anti-money laundering domains), the processing of invoicing data, with reference to natural persons, will be performed on the basis of a regulatory obligation which the Data Controller is required to comply with.

The processing of data relating to the Newsletters delivery has its legal basis in your consent, which you are free to supply or not and which you can, however, withdraw at any time.

RETENTION PERIOD

The personal data collected will be retained for the time necessary to process your order, including the time for the delivery of the product. The Data Controller may continue to retain such Data for a longer period in order to handle any complaint related to the supply of the product.

Processing for administrative and accounting purposes entails a retention period according to the terms established by law: 10 years, pursuant to art. 2220 of the Italian Civil Code. In these cases, only the data strictly necessary for these purposes will be retained.

Processing for the fulfillment of public security obligations entails a retention period according to the terms established by law: 50 years, pursuant to art. 54 of Consolidated Law on Public Security Implementing Regulation (Royal Decree no. 635/1940). The same regulations moreover sets forth that at the end of the activity, the data controller must deliver the aforementioned register to the Public Security Authority which provides for its retention.

The processing for Newsletter delivery purposes entails the retention of contact data for a period not exceeding the achievement of the aims for which they are processed. Namely, the processing will end when you withdraw your consent to the processing, what can be performed by exiting the Whatsapp Business chat.

HOW WE PROCESS PERSONAL DATA

The data collected are processed in electronic, telematic on paper form with logic strictly related to the declared purposes and in any case in order to ensure the security and confidentiality of the data. The filing of the documentation is carried out both electronically and on paper. Some essential information is given below:

- The collection of personal data is limited to the minimum required for any specific purpose of processing.
- The processing of personal data is limited to the purposes for which they are collected.
- The storage of personal data is limited to the minimum required for any specific purpose of processing.



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- Special categories of personal data that may be collected and processed electronically are stored in encrypted form.
- No personal data is provided to commercial third parties.
- No sale or rental of personal data are performed

SCOPE OF DISSEMINATION AND CATEGORIS OF RECIPIENTS TO WHOM PERSONAL DATA HAVE BEEN DISCLOSED

The processing operations are carried out by subjects specifically appointed by the Data Controller with a written deed or otherwise authorized to access the information, who are appropriately trained on personal data processing. In pursuit of the aforementioned purposes, the Data Controller may disclose some of the data collected to external companies, from time to time identified as autonomous data controllers or data processors: adequate measures will be taken to ensure the protection of personal data. Below, we provide a list of categories of subjects who, in pursuit of the aforementioned purposes, may become aware of some categories of data provided:

- Subjects to whom the disclosure is provided by the Statute, by law, by regulation or by national and European Union legislation, as well as, for the fulfillment of contractual or pre-contractual obligations;
- Advisors dealing with tax obligations on behalf of the Data Controller appointed for this purpose as External Data Controllers;
- Banks, credit institutions and companies closely related to debt collection;
- Brokerage firms in case of purchase through e-commerce;
- Legal advisors (eg. credit recovery and contractual advice);
- IT companies, appointed for this purpose as external Data Controllers, insofar as they have access to the information systems within the conduct of their maintenance activities;
- Service Provider Companies, appointed for this purpose as external Data Controllers, insofar as they manage the Newsletter delivery.
- Agents and representatives authorized for this purpose by the Data Controller and trained on personal data processing.
- Shipping companies and carriers, in order to ensure the delivery of the requested products;

TRANSFER OF PERSONAL DATA ABROAD

Your data shall be stored at the Company's headquarters and on servers located in the European Union.

The data controller also intends to inform you that the service is managed by Whatsapp Irland Limited Inc. for users residing in the European Economic Area (including the European Union).

If users reside in any other country, except those in the European Region, the Services are provided by WhatsApp Inc. (USA).

DATA OF INTERESTED PARTIERS

At any time the interested party can exercise its rights towards the Data Controller, pursuant to Regulation (EU) 2016/679 through the following contact details: Armeria Piovanelli S.r.l. *Via Cesare Battisti n. 19 25017 Lonato (BS) VAT No. 00717140982, Telephone number +39 030 9130076, e-mail address amministrazione@piovanelli.com*, in person of its *pro tempore* legal representative. To ensure the correct exercise of the rights, the data subject must render himself unequivocally identifiable. The organisation undertakes to provide feedback a within 30 days and, in the event of impossibility to meet these times, to account for any extension of the deadline. The feedback will be free of charge except in cases of groundlessness (eg. there are no data concerning the interested party) or excessive requests (eg. repeated over time) for which a cost contribution can be charged. The rights relating to personal data concerning deceased persons can be exercised by those who have their own interest or act to safeguard the data subject or for family reasons worthy of protection. In addition the data subject can lodge a complaint with a supervisory authority. In case of personal data breach suffered by the organisation, the Data Controller notifies the



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breach to data protection supervisory authority in charge within 72 hours from the event and will also communicate the occurrence to the data subject, except for the cases of exclusion set forth by the law.

Namely, the interested party has the right to obtain the information on:

- Origin of personal data;
- Categories of processed data;
- Purposes and methods of processing;
- Retention period;
- Logic applied in case of treatment carried out with the aid of electronic instruments;
- Identifying details of the Data Controller;
- Subjects or the categories of subjects to whom data can be disclosed or who may become aware thereof as processors or authorized subjects;
- Existence of profiling processes.

Besides that, the interested party will always have the right to obtain:

- confirmation of the existence or not of their personal data and that these data are made available in an intelligible form;
- updating, rectification, integration of data and limitation thereof;
- erasure, transformation into anonymous form or blocking of data processed unlawfully (including those for which retention is not necessary in relation to the purposes for which they were collected or subsequently processed);
- attestation that the operations referred to in the points above have also been brought to the notice of those to whom the data have been disclosed or disseminated, except in the case where such fulfillment turns out to be impossible or implies the use of means manifestly disproportionate compared to the protected right of the organization;
- copy of the processed data.

Data subjects can exercise their rights by writing to the *e-mail* address amministrazione@piovanelli.com

Data Subjects have the right to lodge a complaint with the Supervisory or bring lawsuit for the protection of their rights.

CONSENT TO PERSONAL DATA PROCESSING

The data subject expresses his consent to processing and disclosure of data with reference to the Newsletter delivery purposes. Namely,

- PROVIDES THE CONSENT
- DENIES THE CONSENT

- To the processing of his telephone number for the delivery via WhatsApp of promotional messages, commercial offers, publicity, cultural events offered or advertised by the data controller.

Place and Date

Signature