



PRIVACY POLICY OF DUGOMRULLI SPA

pursuant to articles 13 of It. Legislative Decree 196/03 and 13 of Regulation (EU)
2016/679

Dugomrulli s.p.a., in the person of its legal representative *pro tempore*, with registered office in Zola Predosa (Bologna), at 8, Via Ippolito Nievo, VAT number 00523361202, in its capacity as Data Controller, pursuant to article 13 of It. Legislative Decree 196/2003, as subsequently amended and supplemented (Code for the protection of personal data) and article 13 of Regulation (EU) 2016/679 (General Data Protection Regulation), would like to inform you that the personal data that you have willingly supplied via the contact channels indicated on the site www.dugomrulli.it (hereafter "Site"), will be subject to processing inspired by the principles of fairness, lawfulness, transparency, protection of confidentiality and of your rights, in full compliance with current rules and regulations on the protection of personal data. It is stated that Dugomrulli spa shall not be liable in any way for the content and services provided by Websites managed by third parties and accessible via links on the web pages of this website.

1. Types of data being processed

Navigation data

IT systems and software procedures used for the operation of the Site acquire, during their normal operation, certain personal data, the transmission of which is implicit in the use of Internet communication protocols (Internet domain and IP protocol, type of browser and operating system of the computer used, date, time and duration of stay on the site, pages viewed, the search engine from which the site was accessed). The aforementioned information is not collected to be associated to identified data subjects; however, it may, by its very nature and through processing and association with data held by third parties, allow the identification of users.

This category of data includes IP addresses or domain names of the computers used by the users who connect to the Site, URI (Uniform Resource Identifier) addresses of the resources requested, the time of the request, the method used to submit the request to the server, the size of the file obtained in reply, the numerical code indicating the status of the reply given by the server (success, error, etc.) and other parameters related to the user's operating system and IT environment. These data are used for the sole purpose of retrieving anonymous statistical information on the use of the Site and for the control of its correct operation and are deleted immediately after processing. Information collected automatically may be used by Dugomrulli spa to ascertain liability in case of commission of computer crimes to the detriment of the Site, for statistical purposes, or for the improvement of the navigation and the contents of the Site.

Data provided willingly through the contact channels on the Site

In order for Dugomrulli spa to be able to respond to a request for information/prepare offers through the contact form on the Site, you will be asked to enter certain information which belongs in the category of common personal data, namely: your name, the company name of your employer and its address, your role inside the Company, the activity sector, a telephone number and an e-mail address. Dugomrulli spa hereby invites you not to provide "special categories of data" (so-called sensitive data) which are not necessary for the request for information/preparation of offers by the Data Controller.

2. Purposes of and legal basis for processing

The personal data provided by you, pursuant to the provisions of articles 6 paragraph 1 letter a), will be processed so that we may reply to your request for information and/or preparation of offers. In that sense, by granting your consent to the processing of the data, you authorize i) the Sales Department of Dugomrulli spa to contact you, over the telephone and/or via e-mail, in order to provide you with the information that you requested, ii) Dugomrulli spa to enter your name and address in its CRM. The processing of your data, with your previous consent, will also be performed for marketing purposes which will consist in the dispatch, via e-mail/regular post, of information material, catalogues and advertising for new products.

3. Data Controller

The Data Controller is Dugomrulli s.p.a., in the person of its *interim legal representative*, with registered office in Zola Predosa (Bologna), at 8, Via Ippolito Nievo, VAT number 00523361202, certified e-mail: dugomrulli@pec.it.

4. Modalities and duration of processing

Personal data that you have willingly provided by filling in the contact form on the Site, or by sending an e-mail to Dugomrulli spa, will be processed, stored, archived, accessed and read by staff expressly authorised and appointed by the Data Controller. In order to safeguard the security of your data, Dugomrulli spa will use the services of suppliers who are leaders in the sector, who offer guarantees of the implementation of the strictest IT security measures for the management of personal data.

Dugomrulli spa will process your data for the time period that is necessary for the fulfilment of the purposes of the processing, in full compliance with the storage obligations set by the law. If your request for information/preparation of an offer does not lead to the establishment of a contractual relationship with Dugomrulli spa, your data will be deleted from the Data Controller's CRM ten years after we have received your request. If, instead, a trade relationship with Dugomrulli spa is established, your data will be deleted 10 years after the termination/end of the contractual relationship, without prejudice to compliance with other storage obligations laid down by law. With regard to data collected for marketing purposes, you may request, at any time, that Dugomrulli spa stop sending you advertising material by communicating your wish to the contact details at the end of this privacy policy. It shall be understood that the possible withdrawal of your consent, although valid, will not have any retroactive effects.

The personal data that you have provided willingly will be processed at the registered office of the Controller, with the help of mainly IT/telematic tools, with a guarantee of the use of adequate technical and organisational security measures, pursuant to and for the purposes of art. 32 of Regulation (EU) 2016/679, capable of reducing the risk of destruction, loss, unauthorized access or processing of your personal data to which you have not consented or otherwise not in conformity to the purposes of the collection in question.

5. Mandatory nature of the provision of data

With regard to the purpose of replying to your requests for information/offers, the provision of your personal data is mandatory, so that the Data Controller may reply to your request for information/preparation of offers. If you do not provide personal data, or if you provide incomplete or incorrect personal data, we will not be able to fulfil your request. Without prejudice to the mandatory nature of the aforementioned provision, which is, as has been mentioned, fundamental for the fulfilment of your request for information/offers, it shall be understood that your consent for the marketing purposes as per above is optional and may, therefore, be refused or subsequently withdrawn by you by contacting the Data Controller at the contact details at the end of this privacy policy.

6. Disclosure to third parties

The personal data that you provide may be disclosed to public, institutional or professional persons whom the law has authorized to request their acquisition, or, and for the exclusive purposes of paragraph 2), to third-party companies or professionals whose services Dugomrulli spa uses in its business activities. Such “third parties” will be appointed, in compliance with the provisions of Article 28 of Regulation (EU) 2016/679, as Data Processors and will, consequently, comply with, on the basis of a specific contractual agreement, security standards during the processing of the data that have been disclosed to them in full compliance with the current rules and regulations on the protection of personal data.

7. Rights of the data subjects

In accordance with the provisions of article 7 of It. Legislative Decree 196/03 and articles 15 et seq. of Regulation (EU) 2016/679, you may, at any time and in your capacity as “data subject” of the Processing, exercise vis-a-vis the Data Controller your rights to:

- a) **RIGHT TO ACCESS:** which allows you to access your personal data and to obtain a copy, or to request information regarding the purposes and modalities of processing;
- b) **RIGHT TO RECTIFICATION,** which allows you to obtain the rectification of your data, if they are inaccurate, or their completion, if they are incomplete;
- c) **RIGHT TO ERASURE** (“right to be forgotten”) which allows you to obtain the erasure of your data in the cases provided for by article 17 of Regulation (EU) 2016/679;
- d) **RIGHT TO RESTRICTION OF PROCESSING,** which allows you to obtain the restriction of processing in the cases provided for by article 18 of Regulation (EU) 2016/679;
- e) **RIGHT TO PORTABILITY,** which allows you to receive the personal data concerning you in a structured, commonly used and machine-readable format and the right to have Dugomrulli spa transmit those data to another Controller, if technically possible. We would like to point out that this right may be exercised to the extent to which the processing is based on consent or the performance of a contract, is performed by automated means and on the condition that the exercise of this right does not harm the rights and freedoms of third parties.
- f) **RIGHT TO OBJECTION,** which allows you to object, at any time, to the processing of data performed for purposes of direct marketing;
- g) **RIGHT TO LODGE A COMPLAINT,** which allows you to lodge a complaint with the Personal Data Protection Authority pursuant to and for the purposes of art. 77 of Regulation (EU) 2016/679.

For the purpose of the exercise of the rights or to obtain more information on the Privacy Policy, you may contact Dugomrulli spa, at 8, Via Ippolito Nievo, Zola Predosa (BO), or send an e-mail to the following address dugomrulli@pec.it.

We hereby point out that, before we can provide or amend any information, we may have to verify your identity.

Information on the Privacy Policy

This Privacy Policy was updated on 25 May 2018. The Data Controller hereby reserves the right to modify or update this document; we therefore invite you to consult this Privacy Policy periodically.