



## **INFORMATION FOR THE PROCESSING OF PERSONAL DATA (pursuant to art. 13 EU Regulation 2016/679 - "GDPR")**

The site [www.fiammascarlatta.com](http://www.fiammascarlatta.com) (hereinafter the "Site") and the app Fiamma Scarlatta (hereinafter the "APP") owned by Fiamma Scarlatta Srl, P.IVA 02872570342, with legal seat in Parma - via Paradigna 38/a (hereinafter the "Data Controller").

With this privacy policy concerning the protection of personal data, Fiamma Scarlatta informs users about the processing of their personal data in relation to access to the Site and the APP and the use of the services provided from time to time by the Site and APP (hereinafter the "Services"). Users' personal data (hereinafter the "Interested Parties") shall be processed in compliance with European and national provisions in force regarding the protection of Personal Data.

### **1. Data Controller**

1.1 The Data Controller is Fiamma Scarlatta srl, with registered office in Parma - via Paradigna 38/a P.IVA 02872570342 - E-mail: [info@fiammascarlatta.com](mailto:info@fiammascarlatta.com) - Tel: +39 0521 1680880

1.2 The Data processor is Mr. Peter Selim Maccaferri, e-mail: [privacy@fiammascarlatta.com](mailto:privacy@fiammascarlatta.com)

### **2. Nature of data processed**

The personal data of adult or who has already reached the age of 16 and received parental consent Interested Parties are processed, where personal data means any information relating to an individual, identified or identifiable even indirectly by reference to any other information (Personal Data).

Fiamma Scarlatta, through the Site and the APP, also collects and records the user's browsing data, which allows access to the Site and the APP as well as the navigation of the same and is used in anonymous and aggregate form for statistical purposes and to verify the correct functioning of the Site and of the APP.

In particular, the Personal Data that may be collected are as follows:

**Contact data:** name, surname, tax code, physical and e-mail address, telephone number, mobile phone number

**Other Personal Data:** if you decide to provide them, date of birth

**Economic information on transactions:** such as means of payment, information on purchases made, orders, etc.

**Geolocation and connection and/or navigation data**

**Use of the website and the APP:** how you access and use the Site and the APP, send and read communications including information collected through cookies (you can find our Cookie Policy in our website footer).

### **3. Purpose of the treatment**

Personal Data is collected following registration on the Site and the APP, for the purchase of products, for answering questions and requests and for sending advertising material. In particular, Personal Data are processed for the following purposes:

- A) to access and navigate the Site and the APP, in particular in the reserved areas of the Site;
- B) to respond to user requests by sending an e-mail to the following address [info@fiammascarlatta.com](mailto:info@fiammascarlatta.com)
- C) for the establishment and execution of contractual relations and consequent obligations;
- D) to send curricula vitae for the positions offered in the "Job" section of the Site ([info@fiammascarlatta.com](mailto:info@fiammascarlatta.com));
- E) to send the newsletter for information and promotional purposes, after filling in the form in the contacting page.



#### **4. Faculty or obligation to provide data and consequences of failure to provide data**

The provision of Personal Data is not mandatory, however, failure to provide such data will make it impossible for the Interested Parties to use the services of the Site and the APP.

Therefore, the provision of Personal Data is necessary for the purposes set out in points 3.A, 3.B, 3C and 3D as it is strictly functional to the performance of the Services requested, and to the fulfillment of legal obligations. Any refusal to provide the data makes it impossible for the Data Controller to provide the requested Services, and/or to fulfill legal obligations.

The provision of the data for the purposes referred to in point 3E above is optional. However, failure to provide consent will make it impossible to receive the newsletter and/or other promotional material. It is possible to unsubscribe from the newsletter at any time by clicking on the "Unsubscribe" link in each newsletter sent.

For the navigation data collected and registered by the Site and the APP, please read the cookie policy

#### **5. Legal basis of the processing**

The legal basis for the processing is the user's consent, the fulfillment of a contractual obligation and the provisions of the law.

#### **6. To whom Personal Data may be communicated**

Personal Data processed for the above purposes may be communicated or disclosed:

- to subjects authorized to process the data under the direct authority of the Data Controller (hereinafter referred to as "persons in charge"), suitably instructed in order to prevent loss, destruction, unauthorized access or unauthorized processing of the data;
- to those subjects to whom the provisions of the law give the right of access, or to whom the transfer of data is necessary for the fulfillment of the requirements of laws or regulations, to persons whose activity is necessary for the performance of contracts to which you are a party or to fulfill requests prior to the conclusion of the contract;
- to third parties to whom the Data Controller may outsource certain activities related to the processing and purposes described above, such as, for example, administrative, accounting, tax, auditing, information system management, credit collection, mass storage, call centers. These third parties carry out processing on behalf of the Data Controller and are authorized to process them as Data Processors in accordance with the provisions of Article 28 of the GDPR.

#### **7. Retention period**

Personal Data are kept by us only for the time necessary to achieve the purposes for which they were collected or for any other legitimate related purpose to which must be added the additional period provided for by law in compliance with civil, fiscal and tax obligations in force. In the event that the Personal Data collected are processed for two different purposes, we will retain such data until the longer period of time for which it was collected. In any case, Personal Data will not be processed for that purpose for which the period of retention has ceased.

For the sake of completeness, below are the storage times for the different purposes listed above:

A) for accessing and browsing the Site and the APP: the data processed for this purpose will be stored no later than 5 years after the last activity and/or access to our Site and to our APP;

B) to respond to user requests by using the form on the "Contact Us" page of the Site and of the APP: the data will be processed for the time necessary to satisfy the request and/or request;



C) for the establishment and execution of contractual relations and consequent obligations: the data processed to carry out any contractual obligation will be kept for the entire duration of the contract and in any case no later than the following 10 years, for tax and contractual purposes;

D) for sending curricula vitae for the positions offered in the "Job" section of the Site: the data will be kept for 6 months from receipt;

E) for sending the newsletter for information and promotional purposes: Personal Data processed for marketing purposes will be kept for 24 months from the date on which your last consent was given for this purpose, except for the opposition to receive further communications.

At the end of the data processing period, the data will be deleted, i.e. made permanently anonymous.

### **8. Methods of treatment**

The processing of Personal Data is carried out by means of manual, computerised and telematic instruments with logics strictly related to the purposes themselves, and in any case in such a way as to guarantee the security and confidentiality of the data.

The documentation is filed both electronically and on paper.

The data stored on electronic/magnetic/informatics supports are stored and archived on a server located in Italy; Personal Data stored on paper supports are stored in special archives, in premises at the Data Controller's headquarters, located in Parma - Paradigna 38/a – 43122 Parma.

Personal Data are processed by Fiamma Scarlatta's collaborators and/or employees as data processors or persons in charge of processing, within the scope of their respective functions and in compliance with the instructions given by Fiamma Scarlatta itself.

Personal Data shall not be disclosed.

### **9. Rights of the interested parties**

Users may assert their rights, as expressed in Articles 15, 16, 17, 18, 19, 20, 21, 22 of EU Regulation 2016/679, by contacting the Data Controller, or the Data Processor.

In particular, the user will have the right, at any time, to ask the Data Controller at the e-mail address [customerservice@fiammascarlatta.com](mailto:customerservice@fiammascarlatta.com), for access to his/her Personal Data, correction, deletion of the same, limitation of processing, revocation of consent. Furthermore, you have the right to oppose, at any time, the processing of your Personal Data (including automated processing, e.g. profiling, if carried out by the Data Controller), as well as the portability of your Personal Data. Without prejudice to any other administrative and judicial remedy, if the user considers that the processing of his/her Personal Data violates the provisions of EU Reg. 2016/679, pursuant to art. 15 letter f) of the above mentioned EU Reg. 2016/679, he/she has the right to lodge a complaint to the Privacy Guarantor using the contact details available on the authority's website [www.garanteprivacy.it](http://www.garanteprivacy.it) and, with reference to art. 6 paragraph 1, letter a) and art. 9, paragraph 2, letter a), he/she has the right to revoke his/her consent at any time. In the event of a request for portability of the data, the Data Controller shall provide you with the Personal Data concerning you in a structured, commonly used and readable format, by automatic device, without prejudice to paragraphs 3 and 4 of Article 20 of EU Reg. 2016/679.

### **10. Privacy Policy Updates**

This Privacy Policy is subject to occasional review. If changes are introduced to the treatment Fiamma Scarlatta will give appropriate notice to the user. Where required by current legislation, the user shall have the right to give his/her consent to any new processing. In case of refusal, the user's data will not be processed according to the changes provided for in the Privacy Policy.