

**GDPR information on USERS' processing of personal data
when registering the ACCOUNT and the REPLACEMENT GUARANTEE on our website**

This information is provided in accordance with article 13 of EU Reg. 2016/679 "European regulation on personal data protection" (also known as GDPR) to USERS who register on www.mircovisconti.com website owned by MIRCO VISCONTI Spa and for the registration of the REPLACEMENT GUARANTEE in accordance with the applicable validity terms.

DATA CONTROLLER	The Data Controller is MIRCO VISCONTI SPA (Tax ID / VAT No. 01234100061) with headquarters in Viale Santuario 3 -15048 Valenza (AL) Tel. +39 0131.941024 - Fax +39 0131.954475 Any request for information and/or clarifications regarding the processing of personal data should be made by sending an email to visconti@mircovisconti.com or a certified e-mail to pec@pec.mircovisconti.com or by sending a regular e-mail to the above address.
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Types of personal data processed:

The data collected and processed concern personal data and contact details.

Please note that we do not request and are not in possession of any of your personal data that can be qualified as criminal records (pursuant to art. 10 of the GDPR), nor of other data that could be qualified as belonging to particular categories of personal data (pursuant to art. 9 of the GDPR).

Purposes and legal basis of processing

The data provided is processed for the following purposes in accordance with the legal basis specified below:

Purpose (Why we process your data)	Legal basis - lawfulness	CONSEQUENCES IN CASE OF REFUSAL TO PROCESS AND OPTIONAL CONSENT
Performance of services related to registration on the website and execution of the contractual/commercial relationship to which the data subject is a party (and/or pre-contractual agreements aimed at establishing it) and resulting internal organization (management of negotiations, orders, shipments for delivery of goods/products, assistance, replacements and cases to which the replacement warranty applies)	Article 6, paragraph 1, Letter a) of the GDPR Consent	The provision of data is optional, but in case of refusal it will not be possible to provide the requested services and conduct the contractual/commercial relationship.
Internal organizational management (certifications, detection of the degree of satisfaction on the quality of services, dispute management) Communications of internal information material, corporate initiatives in relation to products or services similar to those that can be required for the viewing of the jewel in a shop and/or purchased.	Article 6, paragraph 1, Letter f) of the GDPR Legitimate interest	Consent is not required as the possible processing is referred to the pursuit of a legitimate interest aiming at, by way of example: <ul style="list-style-type: none"> - Administrative management control, fraud prevention, warehousing, production and shipment requirements - Defending a right in administrative and legal proceedings. The use of e-mail addresses is permitted pursuant to and within the limits of art. 130, paragraph 4 of Legislative Decree 196/03 (and further amendments thereof) and by the provisions of the Data Protection Authority of 19 June 2008 (Official Gazette no. 152 dated 1 July 2008). The data subject may object to this processing at any time, initially or on the occasion of subsequent communications, easily and free of charge, by writing directly to the sender's postal address or to the contact details specified for the Data Controller.
Sending of commercial communications, advertising material concerning products or services offered for marketing purposes	Article 6, paragraph 1, Letter a) of the GDPR Consent	The provision of data is optional, but in case of refusal advertising communications will not be sent automatically.

Processing methods, technical and organizational security measures

Data processing for the purposes detailed above takes place both manually (on paper) and with the help of computerized/electronic tools, by adopting appropriate security measures to prevent data loss, illicit uses, or misuse and unauthorized access in order to guarantee the security, confidentiality and protection of data.

Furthermore, processing does include the use of automated decision-making processes and the data processed will not be used for profiling purposes.

Data transfer

The Data Controller will not transfer personal data to third countries (outside the European Union) or to international organisations. Data are processed and stored in paper, digital and telematic archives at the headquarters of the company.

Duration of treatment and retention period

Data will be processed and stored only for the time required to carry out the above tasks in compliance with the obligations of law to which we are subject. In particular, they will be kept for the entire duration of the commercial relationship and for a subsequent period in compliance with the regulations in force regarding conservation, unless further terms are set, to allow the company to defend its rights.

Data Access and Data Communication

Personal data processed by the Data Controller will not be disclosed nor they will be disclosed to unidentified recipients, in any possible form, including that of making them available or for simple consultation.

Instead, they may be communicated to third parties outside the organisation who collaborate with us and we, to ensure greater protection, will evaluate from time to time whether to designate data processors pursuant to art. 28 of the GDPR.

Such third parties outside the organisation, will provide their services under the control and direction of the company and may have access to personal data to the extent necessary to render their services. By way of example, the categories of recipients include credit institutions, sales agents.

In accordance with the validity terms in force, data will be transmitted to an insurance/brokerage company for the management of the product replacement warranty.

They could also be communicated for specific needs to shops/customers of the Data Controller, for example if they need to collaborate with these subjects for the purpose of providing the services - viewing and supplying the products - requested by the user.

The data subject's personal data are mainly disclosed to third parties and/or recipients whose activity is necessary to perform the activities relating to the commercial relationship established and comply with certain obligations of law. They may be communicated to public bodies and administrations, as well as to subjects the law has authorised to receive such information, Italian and foreign judicial authorities, and other public authorities, for purposes related to the fulfilment of obligations of law, or the fulfilment of the obligations undertaken and arising out of the contractual relationship, including defence in court.

Furthermore, on the basis of the organizational structure of MIRCO VISCONTI SPA, some workers and collaborators are entitled to process personal data, within the limits of their roles and in accordance with the authorisation/instructions received.

The updated list of subjects involved in the management of personal data is available, subject to a legitimate and justified request, at the administrative headquarters of the Data Controller.

Rights of the data subject (articles 15-20 of the GDPR):

The European Regulation recognises natural persons as interested parties, the following rights that can be exercised with the Data Controller.

Right to access: the data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data.

Right to rectification: the data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject has the right to obtain the integration of the incomplete personal data, even by providing a supplementary declaration.

Right to be forgotten: the data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay where one of the grounds provided by the regulation apply.

Right to restriction of processing: the data subject shall have the right to obtain from the controller restriction of processing where one of the grounds provided by the regulation apply.

Right to object: the data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on point (e) or (f) of Article 6(1), including profiling on the basis of these provisions or object to the processing of direct marketing purposes (if any).

Right to data portability: the data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit such

data to another controller without hindrance from the controller to which the personal data have been provided according to the conditions set by the regulation.

- **Right to withdraw consent:** Art. 7 of the European Regulation allows the data subject to revoke the consent given at any time, for any purpose for which it was agreed (Article 6 paragraph a of the GDPR). The withdrawal of consent does not affect the lawfulness of the processing based on the consent before the revocation.

To exercise these rights, the data subject can contact Data Controller Mirco Visconti Spa by sending a specific communication to visconti@mircovisconti.com or by writing to the contact addresses listed in the dedicated section in the header of this document, and including the appropriate information (name, surname, right you wish to exercise) in order to be able to correctly manage the requests that will be received.

- **Right to lodge a complaint:** if the data subject believes that the processing concerning him or her breaches EU Regulation, article 77 of such regulation gives the right to lodge a complaint with a supervisory authority, in the Member State where the data subject is habitually residing, works or the place where the alleged breach occurred. More specifically is worth mentioning the institutional website of the Data Protection Authority for the protection of personal data www.garanteprivacy.it in which the related operating methods are indicated with reference to the national supervisory authority.

Valencia (AL), 04 April 2022

The Data Controller

MIRCO VISCONTI S.p.a.