

PRIVACY POLICY NOTICE PURSUANT TO ARTICLE 13 OF EU REGULATION 2016/679 relating to first and contact and/or marketing activities and other commercial initiatives

Data protection is a very serious matter for us, so we would like to inform you about the way in which your data is processed and the rights you can exercise under current data protection legislation, in particular EU Regulation 2016/679 (hereinafter also: "GDPR").

1. Data controller

Sartoria Equestre S.r.l.
Via Fratelli Bandiera n. 2, 24048, Treviolo(BG)
E-mail contact: privacy@sartoriaequestre.com

2. The categories processed personal data

The categories of 'personal data' (ex. Art. 4.1 of the GDPR) processed by the Data Controller may include, but are not limited to:

- Biographic and identification data (e.g. first name, surname, date of birth, etc.);
- Contact data (e.g. address, e-mail address, telephone number, etc.);
- Data on the role held in the company or organization if the data subject is a contact person/representative;
- Data on specific interests in the equestrian sector and/or profession pursued in the same;
- Data relating to any services provided (relating to the sending of the newsletter).

3. Lawfulness and purpose of processing

3.1 Purposes aimed at fulfilling a legal obligation (ex-Art. 6(1)(c) of the GDPR)

Fulfillment of obligations provided for by Laws, Regulations and Community Legislation in relation to or in any case connected to the relationship in place with the data subject (such as, for example, the storage of data to demonstrate compliance with the Privacy legislation under the principle of accountability).

The retention period of personal data for the purpose of this section is:
For the purpose: a, 5 years from the termination of consent.

3.2 Purposes of the performance of a contract or pre-contractual measures (ex-Art. 6(1)(b) GDPR)

- a) Carrying out pre-contractual activities, also with reference to the first contact (also by exchanging or otherwise receiving business cards) and to the possible preparation and sending of quotations for the Data Controller's products.

The retention period of personal data for the purposes of this section is:
For the purpose: a, until the end of the pre-contractual activity.

3.3 Purposes covered by the data subject's consent (ex Art. 6(1)(a) GDPR)

- a) Carrying out advertising or promotional activities, in the broadest sense of the term (e.g. sending newsletters and information material, sending brochures, organizing events, etc.) and other marketing activities, by means of automated contact methods (e-mail) with reference to the commercial sector for riding products;
- b) Conducting market surveys by questionnaire;
- c) Receipt of customized offers with respect to the Data Controller's products, operating in the commercial sector for riding products, based on the profile created through the answers to the questionnaire, either by e-mail or by telephone.

The retention period of personal data for the purposes of this section is:
For the purpose: a, 5 years from the granting of consent, unless revoked;
For the purpose: b, within 12 months the data will be aggregated and anonymised;
For the purpose: c, 12 months from the granting of consent.

4. Recipients or categories of recipients of personal data (pursuant to Article 13(1)(e) of the GDPR)*

Within the scope of the above-mentioned purposes, the data controller may communicate your data to

- Offices and internal functions of the Controller himself;
- Companies and professionals providing IT services, including electronic data processing, software management, site management and IT consultancy;
- Advertising and communication companies and agencies.

* More information on the Recipients (ex-art. 4.9 of the GDPR) is available from the Data Controller at the above-mentioned addresses.

5. Recipients or categories of recipients of personal data (ex-Art. 13(1)(f) GDPR) and transfer of data to non-EU countries

The Data Controller informs you that it has no intention of transferring your data to countries outside the EU and the EEA for the above-mentioned purposes.

6. Rights of the Data Subject (pursuant to Art. 13(2)(b) of the GDPR)

The data subject may assert the following rights:

- the data subject's right of access [Art. 15 of the EU Regulation] (the possibility to be informed about the processing carried out on one's Personal Data and, if necessary, to receive a copy of it);
- Right to rectification of one's Personal Data [Art. 16 of the EU Regulation] (the data subject has the right to rectification of inaccurate personal data concerning him/her);
- right to the deletion of one's own Personal Data without undue delay ('right to be forgotten') [Art. 17 of the EU Regulation] (the data subject has, as well as will have, the right to the deletion of his or her own data);
- the right to limitation of the processing of one's Personal Data in the cases provided for in Article 18 of the EU Regulation, including in the case of unlawful processing or contestation of the accuracy of Personal Data by the data subject [Article 18 of the EU Regulation];
- right to data portability [Art. 20 of the EU Regulation], the data subject may request his or her Personal Data in a structured format in order to transmit it to another data controller, in the cases provided for in that Article;
- the right to object to the processing of one's own Personal Data [Art. 21 of the EU Regulation] (the data subject has, as he or she will have, the right to object to the processing of his or her own Personal Data);
- right not to be subject to automated decision-making processes, [Art. 22 of the EU Regulation] (the data subject has, as will have,

Equestrian Tailoring Letterhead

the right not to be subject to a decision based solely on automated processing).

Further information on the rights of the data subject may be obtained by requesting the full extract of the above-mentioned articles from the Data Controller. With regard to the purposes for which consent is required, the data subject may revoke his or her consent at any time and the effects shall run from the time of revocation, subject to the time limits provided for by law. In general terms, revocation of consent has effect only for the future.

The above-mentioned rights may be exercised in accordance with the Rules by sending an e-mail to privacy@sartoriaequestre.com.

In accordance with Article 19 of the EU Regulation, the Controller shall inform the recipients to whom the personal data have been disclosed of any rectification, erasure or restriction of processing required, where possible.

In order to allow a quicker response to your requests made in the exercise of the aforementioned rights, they may be addressed to the Data Controller by addressing them to the addresses indicated in point 1.

7. Right to lodge a complaint (ex-Art. 13(2)(d) GDPR)

If the data subject considers that his or her rights have been compromised, he or she has the right to lodge a complaint with the Italian Data Protection Authority, in accordance with the procedures indicated by the Authority itself at the following address: <http://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/4535524> or by sending written notice to the Italian Data Protection Authority.

8. Possible consequence of non-disclosure of data and nature of the provision of data (pursuant to Article 13(2)(e) of the GDPR)

8.1 When fulfilling legal or contractual obligations

Please note that if the processing purposes have a legal or contractual (or even pre-contractual) obligation as a legal basis, the data subject must necessarily provide the requested data.

Failure to do so will make it impossible for the Controller to pursue the specific processing purposes.

8.2 In case of consent of the data subject

For other purposes, for which consent is required, the data subject may revoke his or her consent at any time and the effects shall run from the time of revocation, subject to the time limits provided for by law. In general terms, revocation of consent has effect only for the future. Therefore, processing that has been carried out before the revocation of consent will not be affected and will retain its legitimacy.

Failure to give consent or partial consent may not guarantee the full provision of services, with reference to the individual purposes for which consent is withheld.

When the data are no longer needed, they are routinely deleted; if deletion is impossible or only possible with disproportionate effort due to a particular storage method, the data may not be processed and must be stored in inaccessible areas.

9. Existence of automated decision-making (including profiling)

The use of purely automated decision-making processes as detailed in Article 22 of the GDPR is currently excluded. Should it be decided in the future to establish such processes for individual cases, the data subject will be notified separately if this is required by law or updated in this policy.

10. Processing methods

Personal data shall be processed in paper, computerized and telematic form and entered into the relevant databases, which may be accessed and thus become known to the employees expressly designated by the Data Controller as Persons in charge of and authorised to process personal data, who may carry out consultation, use, processing, comparison and any other appropriate operation, including automated operations, in compliance with the provisions of the law necessary to guarantee, among other things, the confidentiality and security of the data as well as their accuracy, updating and relevance to the stated purposes.

(Place and date)

(signature/stamp of the Data Controller)

The undersigned _____ declares that he/she has fully understood the information provided by Sartoria Equestre S.r.l. as Data Controller and, in accordance with Article 7 of the EU Regulation:

in relation to section 3.3 lett. a: "Carrying out advertising or promotional activities, in the broadest sense of the term (e.g. sending newsletters and information material, sending brochures, organizing events, etc.) and other marketing activities, by means of automat-ed contact methods (e-mail) with reference to the commercial sector for riding products "

Consents to processing Does not consent to processing

in relation to section 3.3 letter b: "Conduct of market surveys by questionnaire".

Consents to processing Does not consent to processing

in relation to section 3.3 lett. c: "Receipt of customized offers with respect to the Data Controller's products, operating in the commercial sector for riding products, based on the profile created through the answers to the questionnaire, either by e-mail or by telephone ".

Consents to processing Does not consent to processing

(Place and date)

(signature of the data subject)