

# PRIVACY POLICY

## Art.13 of Regulation EU no.679/2016

Rev. November 2022

### Introduction

Under European Regulation no.679/2016 (hereinafter, the "Regulation") and national law on personal data protection (hereinafter referred to collectively as "Privacy Law"), CAPETTI ELETTRONICA S.R.L. invites you to carefully read this Privacy Policy, which contains important information on the protection of your Personal Data.

The processing of your Personal Data will be based on the principles of correctness, lawfulness, transparency, purpose and storage limitation, minimisation and accuracy, integrity and confidentiality, in accordance with the provisions of the Regulation.

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### 1. DATA CONTROLLER

The Data Controller is CAPETTI ELETTRONICA S.R.L. (hereinafter "Capetti Elettronica" and/or the "Data Controller") with registered office in Castiglione Torinese, Strada R. Stratta 57, in the person of its legal representative pro tempore.

### 2. DATA PROTECTION OFFICER - DPO

In accordance with the provisions of the Regulation, the Data Controller has identified and appointed a Data Protection Officer (DPO), who is responsible for monitoring compliance with the Regulation and will be the contact person for data subjects, as well as for the Italian Data Protection Authority. The DPO can be contacted at the email address [direzione@capetti.it](mailto:direzione@capetti.it).

### 3. DATA PROCESSORS

Your Personal Data may be processed by companies appointed as Data Processors to carry out activities related to the processing of Personal Data on behalf of Capetti Elettronica. The Data Controller has drawn up a list of Data Processors, which is constantly updated and which it makes available to you by contacting it at the addresses given in point 12 of this Notice.

### 4. PERSONAL DATA PROCESSED

- Personal details (such as name, surname, date of birth, age, gender, etc.)
- Contact information (email, address, telephone number).
- Geo-location data (including IP addresses)
- Internet browsing data (including data from the use of social media icons/login buttons - e.g., Facebook, Instagram, Twitter, LinkedIn, etc.) collected via the cookies installed on your computer or mobile device (for more information please see our Cookie Policy)
- Photographs and/or video recordings
- Data relating to your interactions with our website and use of notifications on the publication of new contents, initiatives and updates; participation to surveys, initiatives, contests, promotions, events (also through our social media channels).

If a request is sent through the "Contact Us" section of the Capetti Elettronica website, certain Personal Data must be provided in order to enable Capetti Elettronica to meet demands and hence the related fields on the registration form are marked as compulsory.

In addition to the above categories of Personal Data, other data you have provided directly (so-called "Contributions") may be processed and shared on the Social Network pages dedicated to Capetti Elettronica (Facebook, Twitter, Instagram, etc.) as likes, comments, images and in general all the content and information you may have published on the Social Network Capetti Elettronica.

## 5. PURPOSES AND LEGAL BASIS OF THE PROCESSING

In accordance with the needs associated with accessing the various sections of the Capetti Elettronica websites (and without prejudice to the individual initiatives that involve the provision of specific Personal Data, for which specific privacy notices will be published on a case-to-case basis), the purposes of the processing of your Personal Data and the related legal grounds are indicated below:

- **Registration to the website:** the procedure of registration, through the creation of an account, is aimed at allowing you to use the Website as a "Registered User" and to access a series of exclusive services offered through it. The provision of data is optional. The legal basis for processing is the implementation of pre-contractual measures to which the data subject is party.
- **Management of requests and/or initiatives:** Personal Data will be collected in order to answer requests sent to us via email, via website and/or via social networks such as, by way of example but not limited to, requests relating to (a) maintenance/repair/replacement of Capetti Elettronica products, (b) managing participation in our initiatives (such as but not limited to courses, webinars, conferences). The legal basis for this processing is the legitimate interest of the Data Controller.

Other purposes:

- **Marketing:** Subject to your specific consent, we may process your Personal Data in order to send you commercial communications as well as to invite you to take part in our promotional initiatives and to register for our newsletter. The legal basis of this processing is the Consent of the Data Subject, which can be withdrawn at any time.
- **Participation in Masterclasses or courses:** we may process your Personal Data in order to enable your registration and enjoyment of our Masterclasses and training courses. The legal basis for processing is the execution of the Contract to which you are a party.
- **Profiling:** subject to your specific consent, we may process your Personal Data for profiling purposes, namely for analysing or predicting your potential needs so that we can offer you products, services, promotions and customised commercial communications. The legal basis of this processing is the consent of the Data Subject which can be withdrawn at any time.
- Profiling may also be performed through the use of first-party and third-party cookies. We therefore invite you to read our Cookie Policy. This processing may be carried out under the condition that you provide your specific and optional additional consent.

In addition to the previous cases:

- **Analysis purposes:** the Personal Data you have provided when interacting with the Capetti Elettronica world and the information regarding this interaction will be collected in our database and will be used to anonymously analyse and improve the services we offer, to assess the efficiency of the activities and initiatives promoted by Capetti Elettronica and to conduct statistical analysis on the composition of the database. The legal basis of the processing is the legitimate interest of the Data Controller.
- Any other purpose for which you have provided your specific consent can be withdrawn at any time.

## 6. NATURE OF THE PROVISION

The provision of your Personal Data, depending on the purpose pursued, could have optional or obligatory nature. When the nature of the provision is mandatory it means that failure to provide the required Personal Data may affect the possibility to use some services (e.g. to place orders and purchases it is necessary to provide your address, failure to provide this information does not allow you to complete the order/ purchase). When the nature of the provision is optional you will have the possibility to take advantage of basic services but not additional services (e.g., failure to provide consent to receive the newsletter will not affect the sending of the “Contacts” form, but will result in the inability to stay updated on our promotions and initiatives).

The compulsory or optional nature of the provision of your Personal Data will be marked each time using symbols (e.g. “\*”) placed next to the information that requires the provision of data for the respective purpose.

## 7. PROCESSING METHODS

Your Personal Data will be processed in compliance with the provisions of current Privacy Law with the use of electronic or automated means and manual methods, strictly following the purposes for which the data has been collected, via databases, the electronic platforms managed by Capetti Elettronica or by third parties (appointed as Data Processors), the integrated IT systems of Capetti Elettronica and the aforesaid third parties, and/or websites owned or used by Capetti Elettronica.

Your Data will be processed using methods that ensure the highest level of confidentiality and only by people trained and authorised to process it. The Data Controller adopts all the appropriate technical and organisational measures to ensure a level of security appropriate to the risk presented in relation to the processing.

The Personal Data will be processed mainly at the offices of the Data Controller and at the places where the Data Processors are located.

## 8. SHARING AND TRANSFER OF PERSONAL DATA

Your Personal Data may be made accessible, for the purposes stated above, to employees and partners of Capetti Elettronica.

Finally, your Data may be sent to the judicial authorities where necessary and in the cases provided for by law.

## 9. STORAGE PERIOD OF THE DATA

In order to ensure compliance with the principles of necessity and proportionality of the processing, we have defined various Personal Data storage periods for the individual purposes described:

- **Registration to the website/app:** The Personal Data you have provided in order to register to the Website will be stored for the entire period of time that you are registered on the Website.
- **Invoice data** will be stored for an appropriate period of time to ensure the proper performance of the agreement and in any case for an additional 10 years for the purposes of the fulfilment of connected administrative and tax obligations.
- Personal data processed for participation in courses or webinars will be processed for the duration of the course and for as long as necessary to enable the proper management of participation in the course itself and related administrative tasks.
- The data collected for **profiling purposes and for the sending of promotional and advertising material**, for which consent has been given, will be stored for a period of time of no longer than 12 and 24 months respectively or for any other period of time that may be indicated by the supervisory

authorities. If you have not provided the above consent, your personal data will be made anonymous and used for statistical analysis.

- The data collected in order to manage and answer requests about the products Capetti Elettronica will be stored for the period necessary to carry out the requests and will subsequently be cancelled if there is no further contact, except for administrative requirements (for instance, a request concerning a complaint will be stored beyond the period needed to solve it, in order to fulfil administrative requirements).

## **10. DATA OF MINORS**

Capetti Elettronica does not normally collect the Personal Data of minors, nor does it deliberately establish any communication with them. For this reason, we invite parents to actively monitor the online activities of their children under sixteen years of age.

Nevertheless, if we were to contact a minor under 16 years of age, consent must be obtained from his/her parents or the holders of parental responsibility.

## **11. RIGHTS OF THE DATA SUBJECT**

You can exercise the rights set out in articles 15 et seq. of the Regulation against the Data Controller at any time, including:

- a) the right to obtain confirmation as to whether or not personal data concerning you exists, regardless of it being already recorded, and communication of such data in intelligible form;
- b) the right to withdraw the consent you have given for the purposes of the processing at any time;
- c) the right to access, rectify, erase and limit the processing and portability of your personal data;
- d) the right to object to its processing any time you wish.
- e) the right to commence proceedings before the competent supervisory Authority, if you think that the processing of your data is contrary to the laws in force.

## **12. METHODS FOR EXERCISING YOUR RIGHTS**

If you wish to exercise the aforesaid rights, or you wish to have more information on the processing of your personal data, please write an email to: [direzione@capetti.it](mailto:direzione@capetti.it) or write to the registered office of the Data Controller in Strada R. Stratta 57, 10090, Castiglione Torinese.