

# GIOIELLI DI VALENZA S.P.A.

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## Privacy Policy concerning the processing of personal data pursuant to articles 13-14 of (EU) Regulation 2016/679

### Data subject: customers.

GIOIELLI DI VALENZA S.P.A. in its capacity of Data Controller with regard to the processing of your personal data pursuant to (EU) Reg. 2016/679 (hereinafter the 'GDPR'), hereby informs you that the said regulation protects data subjects with regard to the processing of their personal data and that the said processing will take place in a fair, lawful, transparent manner which protects your privacy and your rights.

Your personal data will be processed in accordance with the terms of the above legal provisions and the confidentiality obligations contained therein.

Purposes and legal basis of processing: specifically, your data will be processed for the following purposes, relating to the fulfilment of legal or contractual obligations:

- After sales support;
- Buy Gold Management;
- Clients management;
- legal compliance with regard to taxation and accounting;
- fulfillment of legal obligations relating to anti-money laundering legislation;
- Historical filing system of customer invoices;
- Investment Gold Management;
- Managing of controversy;
- Order management;
- Purchasing management;
- Quality Management;
- Repair request management.

Processing procedures. Your personal data may be processed by the following ways:

- Manual personal data processing with paper filing system;
- computer processing.

All data are processed in compliance with the procedures specified in articles 6 and 32 of the GDPR and with the adoption of the appropriate security measures required.

Your data will only be processed by staff specifically authorised by the Data Controller, and specifically by the following categories of staff:

- Administration office;
- appointees for video surveillance;
- Marketing office;
- purchase department;
- Shops employees.

Disclosure. Your data may be disclosed to external entities for the correct management of the relationship and specifically for the following categories of Recipients, including all the duly designated Data Processors:

- banks and lenders;
- Supervise the adequacy of the organizational, administrative and accounting structure of the company;
- Companies responsible for IVA refund of non-resident foreign citizens not domiciled in the EU;
- consultant and freelance professionals, also working as firms;
- External companies appointed to video surveillance;
- Freight Forwarders and Logistics Companies;
- Public/private subjects whose data transmission is mandatory or necessary in compliance with regulations or functional to the relationship management;
- Companies charged with checking economic solvency.

Dissemination. Data may be disseminated through:

- by the product packaging.

Your personal data may also be transferred, only for the aforesaid purposes, to the following countries:

- EU countries;
- The United Kingdom.

Data Storage Period. In accordance with the principles of lawfulness, limitation of purpose and minimisation of data, pursuant to art. 5 of the GDPR, the data storage period for your personal data is:

- established as a period of time not exceeding the purposes for which the data were collected and processed and complying with the compulsory times required by law.;
- set for a timing not larger than the one which implies its purpose achievement, given the aim to collect data, and collected and processed for the execution and fulfillment of contract purposes;
- set for a timing not larger than the supplied services fulfillment.

The Data Protection Officer (DPO) designated by the Data Controller pursuant to art. 37 of the GDPR is:

- Alessandro Simonassi (address at the headquarters).

You are entitled, by application to the Data Processor, to obtain the erasure (right to be forgotten), restriction, updating, rectification and portability of your personal data, to object to their processing, and in general to exercise all your rights under articles 15, 16, 17, 18, 19, 20, 21 and 22 of the GDPR.

You may also examine whenever you like the updated version of the present report by connecting to the following web site

<https://www.privacylab.eu/informativa.php?09686316163&lang=en>.

## Regulation (EU) 2016/679: Articles 15, 16, 17, 18, 19, 20, 21, 22 - Rights of the Data Subject

1. The data subject has the right to obtain confirmation as to whether or not personal data concerning him or her exist, regardless of their being already recorded, and disclosure of such data in intelligible form, and the right to lodge a complaint with the supervisory authority.

2. The data subject has the right to be informed of:

- a. the source of the personal data;
- b. the purposes and methods of processing;
- c. the logic applied if the data are processed by electronic devices;
- d. the identification data concerning the Data Controller, the Data Processors and the representative designated as per article 5, comma 2;
- e. the entities or categories of entity to whom or which the personal data may be disclosed and who or which may get to know said data as designated representative in the State's territory, as data processors or as persons in charge of the processing.

3. The data subject is entitled to obtain:

- a. the updating, rectification or, where interested therein, integration of the data;
- b. the erasure, anonymisation or blocking of data that have been unlawfully processed, including data whose retention is not necessary for the purposes for which they were collected or subsequently processed;
- c. certification to the effect that the operations as per letters a) and b) have been notified, as also related to their contents, to the entities to whom or which the data were disclosed or disseminated, unless this requirement proves impossible or involves a manifestly disproportionate effort compared to the right that is to be protected;
- d. the portability of the data.

4. The data subject has the right to object, in whole or in part:

- a. on legitimate grounds, to the processing of personal data concerning him/her, even though they are relevant to the purpose of the collection;
- b. to the processing of personal data concerning him/her, where it is carried out for the purpose of sending advertising materials or direct selling or else for the performance of market or commercial communication surveys.