

PRIVACY POLICY

in accordance with the European Regulation no. 679/2016 ("GDPR")

Minotti Collezioni s.r.l considers of fundamental importance the protection of personal data of its users (hereinafter, the "Users") and ensures that the processing of personal data carried out through the site www.minotticollezioni.it (hereinafter, the "Site") are carried out in compliance with the rights of the data subject, with particular reference to confidentiality, protection of personal identity and the right to protection of personal data (hereinafter, the "Data"), in accordance with the provisions of the European Regulation no. 679/2016 (hereinafter, the "GDPR") and other national and community provisions of reference.

Types of Data processed and methods of processing

Minotti Collezioni s.r.l collects certain personal data of Users, such as first name, last name, e-mail address, telephone number, user ID and Password, aggregate information while browsing the Site, other personal data voluntarily provided by the User during the registration phase, or when requesting goods or services offered by the Site or when requesting information sent to the Site by e-mail. The Site is accessible to Users without the need to provide their personal data. However, some parts of the Site, are accessible only to registered Users. The personal data of Users, therefore, may be processed, by automated means, during browsing, at the time of registration to the Site, at the time of the request for information or request for supply of goods. In addition, in the event that a User contacts to ask for information, Minotti Collezioni s.r.l will collect his personal data in order to be able to provide a response. Navigation data In the course of their normal operation, the computer systems and software procedures responsible for the operation of the Site acquire some personal data whose transmission is implicit in the use of Internet communication protocols. This is information that is not collected to be associated with identified interested parties, but which by their very nature could, through processing and association with data held by third parties, allow Users to be identified. This category of data includes IP addresses or domain names of the computers used by Users who connect to the site, the addresses in URI (Uniform Resource Identifier) notation of the resources requested, the time of the request, the method used in submitting the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the operating system and the computer environment of the Users.

Data provided voluntarily by the User

Minotti Collezioni s.r.l also collects personal data of Users entered in the forms for requesting information, quotes, goods or services, as well as forwarded to Minotti Collezioni s.r.l by electronic mail.

Personal data automatically placed on Users' computers (Cookies)

Cookies are small files, usually short strings of text and numbers, containing information placed on Users' browsers when a website is visited. In the course of browsing, Users may also receive on their terminal equipment cookies from different sites (so-called "third-party" cookies), set directly by operators of said websites and used for the purposes and in the manner defined by them. For

more information regarding the type and use of cookies on this site, please refer to the cookie policy.

Purposes of personal data processing

Minotti Collezioni s.r.l will process Users' personal data for the following purposes:

- 1) needs related to the authorization, enabling and customization of access to the various areas and related content of the Site;
- 2) performance of a service or operation requested by the User within the scope of the Company's activity;
- 3) sending newsletters and periodic updates (e.g. by e-mail) relating to products, services;
- 4) initiatives and events organized by or in collaboration with Minotti Collezioni s.r.l, including invitations to the aforementioned events, both by traditional means of communication (e.g. paper mail, operator phone calls, etc.), and by automated electronic means as referred to in Article 130, paragraphs 1 and 2 of Legislative Decree 196/03 and, possibly, as referred to in the EU and/or national provisions that will replace/integrate the aforementioned legislation.
- 5) direct marketing activities, aimed at promoting the services, products and brands of Minotti Collezioni s.r.l, both with traditional modes of communication (e.g. paper mail, operator phone calls, etc.). Either by automated electronic means as referred to in Article 130, paragraphs 1 and 2 of Legislative Decree 196/03 and, where applicable, as referred to in the EU and/or national provisions that will replace/integrate;
- 6) activities of analysis and market surveys, both with traditional modes of communication (e.g. paper mail, operator phone calls, etc.), and with automated electronic methods referred to in Art. 130, paragraphs 1 and 2 of Legislative Decree 196/03 and, if necessary, referred to in the EU and/or national provisions that will replace/integrate the aforementioned legislation;

What are the legal bases for processing

The Controller processes Personal Data relating to the User if one of the following conditions exists:

- 1) the User has given consent for one or more specific purposes; Note: in some jurisdictions, the Controller may be authorized to process Personal Data without the need for the User's consent or another of the legal bases specified below, as long as the User does not object to such processing. This does not apply, however, if the processing of Personal Data is governed by European legislation on the protection of Personal Data;
- 2) the processing is necessary for the performance of a contract with the User and/or the execution of pre-contractual measures;
- 3) the processing is necessary to fulfill a legal obligation to which the Controller is subject;
- 4) the processing is necessary for the performance of a task of public interest or for the exercise of public authority vested in the Controller;
- 5) the processing is necessary for the pursuit of the legitimate interest of the Controller or a third party.

However, it is always possible to ask the Data Controller to clarify the concrete legal basis of each processing and in particular to specify whether the processing is based on law, required by a contract or necessary to conclude a contract.

Methods of processing

The processing of Data will be based on the principles of lawfulness, correctness, transparency, proportionality and minimization and may also be carried out by means of automated methods suitable for storing, managing and transmitting them and will take place by means suitable, as far as reasonably possible and in the state of the art, to guarantee security and confidentiality through the use of appropriate procedures that avoid the risk of loss, unauthorized access, illicit use and dissemination.

Period of Data Retention

Personal Data are processed and retained for the time required by the purposes for which they were collected. Therefore:

Personal Data collected for purposes related to the performance of a contract between the Data Controller and the User will be retained until the performance of such contract is completed.

Personal Data collected for purposes attributable to the legitimate interest of the Data Controller will be retained until such interest is satisfied. The User may obtain further information regarding the legitimate interest pursued by the Controller by contacting the Controller. When processing is based on the User's consent, the Controller may retain Personal Data longer, until such consent is revoked. In addition, the Data Controller may be obliged to retain Personal Data for a longer period in compliance with a legal obligation or by order of an authority. Necessary for the performance of direct marketing activities will be deemed valid until the user unsubscribes, which is possible via a link in each email. If the frequency of sending is less, at least every twelve months a verification notice will be sent to all users, containing the unsubscribe link. At the end of the period of conservations the Personal Data will be deleted. Therefore, at the expiration of this period the right of access, cancellation, rectification and the right to Data portability can no longer be exercised.

Who processes the Data

The entity that determines the purposes and methods of the processing of the Data, i.e. the Data Controller is Minotti Collezioni s.r.l, based in Cabiato (CO), Via B.Buozzi, 46, e-mail: minotti@minotticollezioni.it, Tel. +39 031 766 248, Fax +39 031 769 0072. All employees of Minotti Collezioni s.r.l who access, or will access, the data of the Users operate/will operate under the direct authority of the Data Controller, are/will be appointed as authorized subjects for the processing of personal data and have/have received, in this regard, adequate operating instructions. Users may address any kind of communication and request to the Data Controller or the Data Protection Officer at the above-mentioned postal, fax or certified mail addresses.

Who are the recipients of your Personal Data

The entity that determines the purposes and methods of Data processing, i.e., the Data Controller is Minotti Collezioni s.r.l, based in Cabiato (CO), Via B.Buozzi, 46, e-mail: minotti@minotticollezioni.it, Tel. +39 031 766 248, Fax +39 031 769 0072.

Your Personal Data may be communicated to and processed by:

(i) legal entities or individuals acting as external data processors, performing outsourced activities, appointed by Minotti Collezioni s.r.l or by the external data processors of Minotti Collezioni s.r.l

(including entities entrusted with assistance, communication, marketing, advertising, promotions and sales of products and/or services as well as advertisers, advertising agencies, IT service providers, Site/APP managers, electronic platform managers, partners, credit institutions, professional firms);

(ii) employees and/or contractors of the Controller who, acting under the direct authority of the Controller, will be authorized to process your Personal Data;

(iii) employees and/or contractors of external data processors (including system administrators) who, acting under the direct authority of the external data processors, will be authorized to process your Personal Data. Your Personal Data will not be disclosed to third parties except in the event that your Personal Data needs to be disclosed by Minotti Collezioni s.r.l to consultants in order to protect its rights, or disseminated.

Transfer of Data abroad.

Data will not be transferred outside the European Union.

Rights of Users with regard to their Personal Data

The Privacy Policy recognizes you, as a data subject, several rights. In particular, you have the right to:

1. obtain from the Controller confirmation of the existence or non-existence of your Personal Data, even if not yet registered and their communication in an intelligible form as well as access to your Personal Data (by obtaining a copy of it) and to related information (including the purposes of the processing, the categories and origin of the Personal Data, the categories of recipients to whom they have been or may be communicated, the storage period (when possible), the rights that can be exercised);
2. obtain from the Controller the rectification of your Personal Data and the integration of your incomplete Personal Data;
3. obtain from the Data Controller the deletion of your Personal Data without undue delay, inter alia, when the Personal Data is no longer necessary in relation to the purposes for which it was processed or there is no longer a legal basis for its processing;
4. obtain from the Data Controller the transformation into anonymous form or the blocking of your Personal Data processed in violation of the law, including those that do not need to be stored, in relation to the purposes for which the Personal Data was collected or subsequently processed;
5. Obtain from the Controller the restriction of the processing of your Personal Data, inter alia, when you contest its accuracy or object to its processing, for the period necessary for the respective verifications;
6. receive, in a structured, commonly used and machine-readable format, your Personal Data as well as transmit or, if technically feasible, obtain the direct transmission of your Personal Data to another data controller without hindrance, in cases where the processing is carried out by automated means and is based on your consent or is necessary for the performance of a contract to which you are a party;
7. revoke your consent to the processing of your Personal Data for any of the purposes for which it was given. You may exercise your rights vis-à-vis Minotti Collezioni s.r.l by accessing the "Contact Us" section of the Site or by writing to the following email address minotti@minotticollezioni.it or

by sending a letter by regular mail to: Minotti Collezioni s.r.l. In addition, if you believe that the processing of your Personal Data violates the Privacy Regulations, you may lodge a complaint with the Data Protection Authority of the State where you reside, where your place of work is located or where the alleged violation occurred, or address the same Authority to request information regarding the exercise of your rights under the Privacy Regulations.

Third Party Sites

This Privacy Policy applies to the personal data of Users, collected through the Site; the same Privacy Policy does not apply to other websites owned by third parties, which may possibly be accessed through a link on the Site. Minotti Collezioni s.r.l cannot be held responsible for the contents of these sites and the rules adopted by them, also with regard to the privacy of Users and the processing of their personal data during navigation operations on such sites. Therefore, Users are requested to pay attention, when connecting to these sites, through the links on our Site and to read carefully their terms of use and privacy policies.

Minotti Collezioni s.r.l

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