

### ***Information policy pursuant to art. 13 of the European Regulation 679/2016***

Pursuant to art. 13 of the European Regulation (EU) n. 2016/679 (hereafter GDPR), Azienda Vitivinicola Piazza Comm. Armando di Piazza Marina, based in Alba (CN), 12051, Fraz. San Rocco Seno D'Elvio n. 31, as data controller, informs you that your data will be processed in the following manner and for the following purposes.

#### ***1. Object of the processing***

The Owner treats your personal identification data (such as name, company name, tax code and VAT number, address, telephone numbers, bank details) you have communicated in the context of contractual relationships.

#### ***2. Purpose of the processing***

Your personal data are processed:

a) without your express consent, pursuant to art. 6 lett. b) of the GDPR, for the following purposes:

- fulfill the pre-contractual, contractual and tax obligations deriving from relations with you;
- fulfill the obligations established by law, regulations, community legislation or an order of the Authority (such as for anti-money laundering cases);
- exercise the rights of the owner such as, for example, the right to defense in court;

b) only subject to your specific and distinct consent, pursuant to art. 7 of the GDPR, for the following Marketing Purposes:

- statistical purposes;
- send via e-mail, mail and / or sms and / or telephone contacts, commercial communications and / or advertising material and / or newsletter on products offered by the Owner.

#### ***3. Legal basis***

Processing is necessary for the execution of a contract for which each customer is a party or for the execution of pre-contractual measures taken at the request of the customer.

For the marketing purposes identified in the previous point, the processing will only take place after your specific and distinct consent, which will constitute the legal basis of the processing. Subsequently, you will have the right to withdraw your consent at any time. The withdrawal of consent, however, will not affect the lawfulness of the treatment based on consent before

revocation.

#### 4. Failure to provide data

The provision of data for the purposes referred to in letter a) of point 2 is a necessary requirement for the execution of the contract. Therefore, the failure to communicate such data implies the impossibility for the Owner to follow up on the activities related to the main processing, namely:

- contract management;
- the obligations, including legal ones, deriving from the relationship established.

The provision of data for the purposes referred to in letter b) of point 2 is optional and there are therefore no consequences in the event of your refusal, if not the impossibility to provide you with more information on the development of our services and greater compliance same to your needs.

#### 5. Method of treatment

Your personal data are subjected to both paper and electronic and / or automated processing, also by inserting them into databases, lists and registers suitable for storing and managing data, in the manner and within the limits necessary for the pursuit of the aforementioned purposes.

Specific security measures are observed to prevent data loss, illicit or incorrect use and unauthorized access. By way of example and not exhaustively: firewall, antivirus, antimalware, backup.

Your data will be processed exclusively by persons authorized to treatment expressly appointed and instructed.

#### 6. Storage

The Data Controller will process personal data for the time necessary to fulfill the aforementioned purposes and for the period prescribed by the laws relating to the conservation obligations for tax and statutory purposes.

For the purposes of Marketing the data will be processed until the person concerned will not exercise the right of withdrawal.

#### 7. Access to data

Personal data processed by the Data Controller will not be disclosed, or will not be disclosed to indeterminate subjects, in any possible form, including that of their availability or simple consultation.

Your data may be made accessible for the purposes referred to in point 2:

- to employees and collaborators of the Data Controller, in their capacity as agents and / or data processors;

- to third party companies or other subjects (as an indication, credit institutes, professional firms, consultants, etc.) who carry out outsourcing activities on behalf of the Owner, in their capacity as external managers of the processing.

Therefore, some of the personal data collected may be communicated as an example to:

- Consultants and freelancers, including associates, companies and law firms, etc., for administrative and accounting purposes, for professional consultancy and tax and legal assistance;
- Banks and credit institutions for the management of receipts and payments;
- Insurance companies;
- Financial administrations and public bodies in fulfillment of regulatory obligations;
- Data processing and IT services companies (eg web hosting, data entry, management and maintenance of infrastructures and IT services, etc.).

They can be communicated to the persons authorized to access it by virtue of provisions of law, regulations, community regulations.

The updated list of external managers is in any case available at the headquarters of the owner.

Furthermore, on the basis of the work tasks performed, some authorized to process have been entitled to process personal data, within the limits of their powers and in accordance with the instructions given to them by the Owner.

The updated list of persons authorized to process personal data is in any case available at the headquarters of the Data Controller.

#### 8. Rights of the interested party

The art. 15 and following of the GDPR (\*), give you the right to obtain:

- confirmation of the existence or not of personal data concerning you, even if not yet registered, and their communication in an intelligible form;
- the indication of the origin of personal data, of the purposes and methods of processing, of the logic applied in case of treatment carried out with the aid of electronic tools, of the identity of the Data Controller;
- the updating, rectification, integration, cancellation, transformation into anonymous form or blocking of data processed in violation of the law, including those whose retention is not necessary in relation to the purposes for which the data are collected or subsequently processed;
- the attestation that these operations have been brought to the attention, also with regard to their content, of those to whom the data have been communicated, except in the case in

which this fulfillment proves impossible or involves a use of means clearly disproportionate to the protected right.

You also have the right:

- to revoke at any time the consent given to the processing of personal data (without prejudice to the lawfulness of the treatment based on the consent given prior to the revocation);
- to object, in whole or in part, for legitimate reasons, to the processing of personal data concerning you, even if pertinent to the purpose of the collection;
- to object, in whole or in part, to the processing of personal data concerning you for the purpose of sending advertising or direct sales material or for carrying out market research or commercial communication;
- to propose a claim to the Guarantor for the protection of personal data in the cases provided for by the GDPR;
- to obtain from the data controller the limitation of processing when one of the hypotheses provided for by art. 18 of the Regulations;
- to the portability of personal data within the limits set out in Article 20 of the GDPR.

#### 9. Modalities to exercising rights

The interested party may at any time exercise the aforementioned rights by sending a communication:

- by e-mail, to the address [apiazzo@piazzo.it](mailto:apiazzo@piazzo.it);
- or by mail via registered mail addressed to l'Azienda Vitivinicola Piazzo Comm. Armando di Piazzo Marina, Alba (CN), 12051, Fraz. San Rocco Seno D'Elvio n. 31.

The Owner is required to provide an answer within one month of the request, extending up to two months in case of particular complexity of the request itself.

#### 10. Identity and contact details of the Data Controller

The data controller is Azienda Vitivinicola Piazzo Comm. Armando di Piazzo Marina, based in Fraz. San Rocco Seno D'Elvio n. 31, 12051 Alba (CN), n. tel. 0173.35689, e-mail [apiazzo@piazzo.it](mailto:apiazzo@piazzo.it)

Alba (CN), Rev. 22/07/2021

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(Azienda Vitivinicola Piazzo Comm. Armando di Piazzo Marina)

**(\* Reg. (CE) 27 aprile 2016, n. 2016/679**

**Article 15 Right of access by the data subject**

1. 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 and the following information:

- a) the purposes of the processing;
- b) the categories of personal data concerned;
- c) the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
- d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- e) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
- f) the right to lodge a complaint with a supervisory authority;
- g) where the personal data are not collected from the data subject, any available information as to their source;
- h) the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

2. Where personal data are transferred to a third country or to an international organisation, the data subject shall have the right to be informed of the appropriate safeguards pursuant to Article 46 relating to the transfer.

3. The controller shall provide a copy of the personal data undergoing processing. For any further copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs. Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form.

4. The right to obtain a copy referred to in paragraph 3 shall not adversely affect the rights and freedoms of others.

**Article 16 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 shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

**Article 17 Right to erasure ('right to be forgotten')**

1. The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies:

- a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- b) the data subject withdraws consent on which the processing is based according to point (a) of Article 6(1), or point (a) of Article 9(2), and where there is no other legal ground for the processing;
- c) the data subject objects to the processing pursuant to Article 21(1) and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2);
- d) the personal data have been unlawfully processed;
- e) the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject;
- f) the personal data have been collected in relation to the offer of information society services referred to in Article 8(1).

2. Where the controller has made the personal data public and is obliged pursuant to paragraph 1 to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers which are processing the personal data that the data subject has requested the erasure by such controllers of any links to, or copy or replication of, those personal data.

3. Paragraphs 1 and 2 shall not apply to the extent that processing is necessary:

- a) for exercising the right of freedom of expression and information;
- b) for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- c) for reasons of public interest in the area of public health in accordance with points (h) and (i) of Article 9(2) as well as Article 9(3);
- d) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) in so far as the right referred to in paragraph 1 is likely to render impossible or seriously impair the achievement of the objectives of that processing; or
- e) for the establishment, exercise or defence of legal claims.

**Article 18 Right to restriction of processing**

1. The data subject shall have the right to obtain from the controller restriction of processing where one of the following applies:

- a) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
  - b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
  - c) the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
  - d) the data subject has objected to processing pursuant to Article 21(1) pending the verification whether the legitimate grounds of the controller override those of the data subject.
2. Where processing has been restricted under paragraph 1, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.
3. A data subject who has obtained restriction of processing pursuant to paragraph 1 shall be informed by the controller before the restriction of processing is lifted.

***Article 20 Right to data portability***

1. 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 those data to another controller without hindrance from the controller to which the personal data have been provided, where:
  - a) the processing is based on consent pursuant to point (a) of Article 6(1) or point (a) of Article 9(2) or on a contract pursuant to point (b) of Article 6(1); and
  - b) the processing is carried out by automated means.
2. In exercising his or her right to data portability pursuant to paragraph 1, the data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.
3. The exercise of the right referred to in paragraph 1 of this Article shall be without prejudice to Article 17. That right shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.
4. The right referred to in paragraph 1 shall not adversely affect the rights and freedoms of others.

***Article 21 Right to object***

1. 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 based on those provisions. The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.
2. Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing.
3. Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.
4. At the latest at the time of the first communication with the data subject, the right referred to in paragraphs 1 and 2 shall be explicitly brought to the attention of the data subject and shall be presented clearly and separately from any other information.
5. In the context of the use of information society services, and notwithstanding Directive 2002/58/EC, the data subject may exercise his or her right to object by automated means using technical specifications.
6. Where personal data are processed for scientific or historical research purposes or statistical purposes pursuant to Article 89(1), the data subject, on grounds relating to his or her particular situation, shall have the right to object to processing of personal data concerning him or her, unless the processing is necessary for the performance of a task carried out for reasons of public interest.