

Autoblu

di Mauro Sacchi



INFORMATION ON THE PROCESSING AND PROTECTION OF PERSONAL DATA (Articles 13 and 14 of EU Regulation 679/2016 or GDPR - General Data Protection Regulation)

Dear Interested Party,

The new EU Regulation no. 679/2016 (hereinafter also "**GDPR** - General Data Protection Regulation") on the protection of personal data entered into force on 25th May 2018. Autoblu di Mauro Sacchi (hereinafter the "**Company**") has always been attentive to the correct management of the personal data of the interested parties: customers and suppliers in general. We undertake daily to protect the security of information by drawing inspiration from high quality standards and in compliance with the GDPR and in compliance with the principle of transparency, the Company has updated its privacy information which we invite you to read below.

1. Data controller and data protection officer

The Data Controller is Autoblu di Mauro Sacchi, with registered office in Via Giovanni Battista Niccolini, 28 - 20154 Milan (Mi).

2. Purpose and legal basis of the processing

The Company processes personal data for the following purposes:

- A. Need to perform a contract to which the interested party is a party or to perform specific and occasional activities at your request. This need represents the legal basis that legitimizes the consequent processing. The provision of data necessary for these purposes represents, as appropriate, a contractual obligation or a requirement necessary for the conclusion of the contract; in the absence of them, the Company may be unable to establish the relationship or execute it.
- B. Need to fulfill obligations under the GDPR. This need represents the legal basis that legitimizes the consequent Processing.

It is reiterated that the provision of data is absolutely necessary for legal and contractual obligations and therefore any refusal to provide them in whole or in part may give rise to the impossibility of providing the requested services.

In case of refusal, please give written notice to the Company. In case of failure to communicate, this information is understood to be accepted without reservation in all its parts.

2.1 Methods of data processing

We inform you that the Company uses the following methods for the processing of personal data:

- paper (registration forms, order forms, etc.);
- IT (management software, accounting, etc.);
- telematic

3. Categories of data processed

The Company processes personal data collected directly from the interested party, and possibly also from third parties, which include, by way of example, personal data (e.g. name, surname, address, date and place of birth), data relating to the image if necessary (e.g. photos on identity card) and other data related to the categories indicated above. The Company may process particular data of its interested parties to follow up on specific services and operations requested by them (e.g. payments). In such cases, the Company will ask the "interested" party requesting specific consent to any processing of the particular data necessary to follow up on these services and / or operations.

4. Recipients or categories of recipients of personal data

The natural and legal persons referred to in the list below may become aware of your data as "Data Processors" and as persons authorized to process personal data, in relation to the data necessary to perform the tasks assigned to them, the natural persons belonging to the following categories: employees of the Company or temporary workers, interns, consultants and employees of the "external companies" appointed as "Managers".

- Business consultant;
- Administration and accounting staff;
- Collaborators;
- Suppliers in general.

5. Transfer of data to third countries

The Company informs that personal data could also be transferred to countries belonging to the European Union or to the European Economic Area having an adequate level of protection of personal data and the exercise of the rights of the "data subjects" is always ensured.

6. Rights of the interested parties

The EU Regulation 679/2016 attributes to individuals, individual firms, consultants, and / or freelancers ("interested") specific rights, including that of knowing what the personal data in the possession of the Company are and how they are used (Right of access), to obtain its updating, rectification or, if there is interest, integration, as well as cancellation, transformation into anonymous form or limitation.

The "interested parties" and legal persons, entities and associations can at any time withdraw, where released, consent to the processing of data:

- for the purpose of sending commercial and advertising material, for direct sale or for market research;
- for profiling and enrichment purposes for marketing purposes.

The Company highlights that the revocation will only take effect for the future.

6.1 Data retention period and right to erasure (Right to be forgotten)

The Company processes and retains the personal data of the interested party for the entire duration of the contractual relationship or the occasional performance, for the execution of the related and consequent obligations, for compliance with the applicable legal and regulatory obligations, as well as for defensive purposes own or third parties and until the expiry of the applicable statutory limitation period, starting from the closing date of the contractual relationship.

At the end of the applicable retention period, the personal data relating to the interested party "will be deleted or stored in a form that does not allow the identification of the" interested party "itself (e.g. irreversible anonymization), unless their further processing is necessary for one or more of the following purposes: (i) resolution of pre-litigation and / or litigation started before the expiry of the retention period; (ii) to follow up on investigations / inspections by Control Bodies and / or external Authorities started before the expiry of the retention period; (iii) to respond to requests from the Italian and / or foreign public authorities received / notified to the Company before the expiry of the retention period.

6.2 Right to portability

Each "interested party" can request to receive or request the transfer of personal data referable to him in possession of the Company in a structured format, commonly used and legible for further personal use or to provide it to another data controller (Right to portability).

In particular, the data that can be subject to portability are personal data (e.g. name, surname, title, date of birth, sex, place of birth, residence, etc.), as well as a set of data generated by the operations that the Company defined for each macro-category of products / services.

7. How to exercise your rights

Each interested party to exercise the rights referred to in paragraph 6 may contact the Data Controller and, if present, the DPO (Data Protection Officer).

The deadline for reply is **one (1) month**, extendable by **two (2) months** in cases of particular complexity; in these cases, the Company provides at least interlocutory communication within **one (1) month**. The exercise of rights is, in principle, free; the Company reserves the right to request a contribution in the event of manifestly unfounded or excessive (even repetitive) requests. The Company has the right to request information necessary for the identification of the applicant.

8. Complaint or report to the guarantor for the protection of personal data

The Company informs that "the interested party" has the right to lodge a complaint or make a report to the Guarantor for the Protection of Personal Data or alternatively lodge an appeal with the Judicial Authority. The contacts of the Guarantor for the Protection of Personal Data are available on the website <http://www.garanteprivacy.it>.

9. Web Site

On this chapter, the Company intends to provide some information on the processing of personal data relating to users who visit or consult the website accessible by telematic means starting from the address <https://www.autobluonline.com/> (the "Site"). The information is provided only for the Company website and not for other websites that may be consulted by the user through links (for which reference is made to the respective privacy policies / policies). Reproduction or use of pages, materials and information contained within the Site, by any means and on any medium, is not permitted without the prior written consent of the Company. E' permitted to copy and / or print for personal use only and not commercial (for requests and queries please contact Company at the address below). Other uses of the content, services and information on this site are not permitted.

With regard to the content offered and the information provided, the Company will ensure that the contents of the Website are kept up-to-date and revised, without offering any guarantee as to the adequacy, accuracy or completeness of the information provided explicitly deciding any responsibility for any errors in the information provided on the Website.

9.1. Navigation Data

Company informs that the personal data you provide and acquired together with the request for information and / or contact, registration on the site and use of the services by smartphone or any other tool used to access the Internet, as well as the data necessary for the provision of such services, including navigation data and data used for the possible purchase of products and services offered by the Company but also only the so-called data of "navigation" of the site by Users, will be treated in compliance with the applicable legislation. During their normal operation, the IT systems and software procedures used to operate this website acquire some personal data whose transmission is implicit in the use of the Internet. This is information that is not collected to be associated with identified interested parties, but which by its very nature could, through processing and association with data held by third parties, allow users to be identified as navigators. This category of data includes the "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 requested resources, the time of the request, the method used in the submit the request to the web server, the size of the file obtained in response, the numeric code indicating the status of the response given by the web server (successful, error, etc.) and other parameters relating to the operating system and the IT environment of the user. These data are used for the sole purpose of obtaining anonymous statistical information on the use of the site and to check the correct functioning of the Company website. It should be noted that the aforementioned data could be used to ascertain responsibility in the event of computer crimes against the Company site or other sites connected or related to it: except for this eventuality, at present the data on web contacts do not persist for more than a few days.

9.2 Data provided by the user

Company collects, stores and processes your personal data in order to provide the products and services offered on the Site, or for legal obligations. With regard to some specific Services, Products, Promotions, etc. Company can process your data for commercial purposes. In such cases, a specific, separate, optional and always revocable consent will be required with the methods and the contact details indicated below.

The optional, explicit and voluntary sending of e-mails to the addresses indicated in the appropriate section of the Website, as well as the compilation of questionnaires (e.g. form), communication via chat, push notification via APP, social network, call center, etc., involves the subsequent acquisition of some of your personal data, including those collected through the use of Apps and related services, necessary to respond to requests. We also point out that when using the mobile connection to access digital content and services offered directly by the Company or by our Partners, it may be necessary to transfer your personal data to such third parties. We point out that you may access the Site or connect to areas where you may be able to publish information using blogs or bulletin boards, communicate with others, for example coming from the Company page on Facebook®, LinkedIn®, YouTube®, and other social networking sites, reviewing products and offers and posting comments or content. Before interacting with these areas, please read the General Conditions of Use carefully taking into account that, under certain circumstances, the information published can be viewed by anyone with access to the Internet and all the information you include in your publications can be read , collected and used by third parties.

9.3 Purposes of processing and legal basis

The data are processed for the purposes:

- 1) strictly connected and necessary for registration to this website, to the services and / or Apps developed or made available by the Company, to the use of the related information services, to the management of contact requests or information, for the purchase of products and services offered through the Company website;
- 2) for ancillary activities related to the management of User / Customer requests and sending the feedback that may include the transmission of promotional material; for the completion of the purchase order for the products and services offered, including the aspects related to payment by credit card, the management of shipments, the possible exercise of the right of reconsideration envisaged for distance purchases, the update on availability of products and services temporarily unavailable;
- 3) related to the fulfillment of obligations under EU and national regulations, the protection of public order, the detection and repression of crimes;
- 4) direct marketing, namely sending advertising material, direct sales, carrying out market research or commercial communication of products and / or services offered by the Company; this activity may also include products and services of companies of the Company Group and be carried out by sending advertising / informative / promotional material and / or invitations to participate in initiatives, events and offers aimed at rewarding users / customers, carried out with "traditional" methods (for example, paper mail and / or calls from an operator), or through "automated" contact systems (for example SMS and / or MMS, telephone calls without operator intervention, e-mail, fax, interactive applications), pursuant to art. 130 c. 1 and 2 of Legislative Decree . 196/03 and smi ;

The provision of data for the purposes referred to in points 1), 2) and 3), connected to a pre- contractual and / or contractual or functional phase to a user request or required by a specific regulatory provision, is mandatory and Failing this, it will not be possible to receive the information and access any services requested; with regard to point 4) of this Information, the consent to the processing of data by the user / customer is instead free and optional and always revocable without consequences on the usability of products and services unless it is impossible for the company to keep up to date on new initiatives or on specific promotions or advantages available to users / customers. Company may send commercial communications relating to products and / or services similar to those already provided, in accordance with Directive 2002/58 / EU, using the electronic or paper coordinates, indicated by you on such occasions to which you can oppose with the methods and the contact details below.

9.4 Methods, treatment logics, storage times and security measures

The processing is also carried out with the aid of electronic or automated means and is carried out by the Company and / or by third parties whose Company can use to store, manage and transmit the data. The processing of data will be carried out with the logic of organization and processing of your personal data, including the logs originating from access and use of services made available via the web, products and services used related to the purposes indicated above and, however, so to guarantee the security and confidentiality of data. The personal data processed will be kept for the time required by the legislation in the applicable time.

Always with regard to data security, in the sections of the website set up for particular services, where personal data are requested from the user, the data is encrypted using a security technology called Secure Sockets Layer, abbreviated to SSL. The SSL technology encodes the information before it is exchanged via the Internet between the user's computer and the company's central systems, making them incomprehensible to unauthorized parties and thus guaranteeing the confidentiality of the information transmitted; moreover, the transactions carried out using electronic payment instruments are carried out using the payment service provider (PSP) platform directly and the company only keeps the minimum set of information necessary to manage any disputes. Precisely with reference to the personal data protection aspects, the user / customer is invited, pursuant to art. 33 of the GDPR to report to the Company any circumstances or events from which a potential "breach of personal data (data breach)" may occur in order to allow an immediate evaluation and the adoption of any actions aimed at combating such event by sending a communication to the reference email of this website. The measures adopted by the Company do not exempt the Customer from paying the necessary attention to the use, where required, of a password / PIN of adequate complexity, which will have to be updated periodically, especially in case the subject has been violated / known by third parties, as well as attention and make it inaccessible to third parties, in order to avoid improper and unauthorized use.

9.5 Cookies

A cookie is a short string of text that is sent to your browser and possibly saved on your computer (alternatively on your smartphone / tablet or any other tool used to access the Internet); this submission generally occurs every time you visit a website. Company uses cookies for different purposes, in order to offer you a fast and secure digital experience, for example, allowing you to keep the connection to the protected area active while browsing through the pages of the site. Cookies stored on your terminal can not be used to retrieve any data from your hard disk, transmit computer viruses or identify and use your e-mail address. Each cookie is unique in relation to the browser and device you use to access the Website or use the Company App. In general, the purpose of cookies is to improve the functioning of the website and the user's experience in using it, even if cookies can be used to send advertising messages (as specified below). For more information on what cookies are and how they work, you can consult the website " All about cookies " <http://www.allaboutcookies.org>. For detailed information on cookies, read the dedicated page: [here](#)

9.6 Areas of communication and data transfer.

For the pursuit of the aforementioned purposes, the Company will be able to communicate and have the personal data of the users / customers deal with third parties with whom we have relationships, in Italy and abroad, where these third parties provide services at our request. We will provide these third parties with only the information necessary to perform the services required by taking all measures to protect your personal data. In the case of use of services offered directly by Partners we will provide only the data strictly necessary for their execution. In any case, only the data necessary for the achievement of the intended purposes will be communicated and, where required, the guarantees applicable to transfers of data to third countries will be applied. We may also disclose personal data to our suppliers of commercial services, for marketing reasons, for this purpose appointed external processors. In addition, personal data may be disclosed to the competent public bodies and authorities for compliance with regulatory requirements or for ascertaining responsibility in the case of computer crimes to the detriment of the site as well as communicated to, or allocated to, third parties (as responsible or, in the case of providers of electronic communication services, autonomous owners), who provide computerized and telematic services (e.g.: hosting, management and development of websites) and whose Company uses of tasks and activities of a technical and organizational nature that are instrumental to the functioning of the website. The subjects belonging to the above categories operate as separate Data Controllers or as Managers appointed by the Company for this purpose.

Personal data may also be known by Company employees / consultants who are specifically trained and appointed as Data Processors.

The categories of recipients to whom the data can be communicated is available by contacting the Company at the addresses indicated below.

9.7 Rights of the interested parties

You can exercise at any time the rights that are recognized by law, including that:

- a) to access your personal data, obtaining evidence of the purposes pursued by the Owner, the categories of data involved, the recipients to whom they may be communicated, the applicable retention period, the existence of automated decision-making processes;
- b) to obtain without delay the correction of inaccurate personal data concerning you;
- c) to obtain, in the cases provided for, the deletion of your data;
- d) to obtain the limitation of the treatment or to oppose it, whenever possible;
- e) to request the portability of the data that you have provided to the Company, i.e. to receive them in a structured format, commonly used and readable by automatic device, also to transmit this data to another owner, within limits and with constraints foreseen by the art. 20 of the GDPR;

You can also submit a complaint to the Authority for the Protection of Personal Data pursuant to art. 77 of the GDPR.

For the treatments referred to in point 4) of the purposes, the Customer can always revoke the consent and exercise the right to oppose direct marketing (in "traditional" and "automated" form). The opposition, in the absence of a contrary indication, will be referred to both traditional and automated communications.

9.8 Data Controller

Data controller, pursuant to art. 4 of the Code and of the GDPR, is AUTOBLU DI MAURO SACCHI, Via Giovanni Battista Niccolini 28, 20154 Milano – VAT number: 03883450169

The rights indicated above may be exercised at the request of the interested party in the manner disclosed by the Customer Service or on the Company's website or by using the following references: Mauro Sacchi.

The use of the Website, including those intended for tablets and / or smartphones, by the Customer and / or the User implies full knowledge and acceptance of the content and any indications included in this version of information published by the Company in the when the site is accessed. Company informs that this information may be changed without prior notice and therefore recommends a periodic reading.

10. Changes to this privacy policy

The Data Controller reserves the right to review or update this Privacy Policy. Any changes to this Privacy Policy will take effect when the new Privacy Policy is issued.

Therefore, please consult this page regularly, referring to the date of the last modification indicated at the bottom.

The Data Controller

This privacy statement has been updated on 2020.07.30