

## PERSONAL DATA PROCESSING POLICY STATEMENT

**Dear Madam/Sir,**

This Policy Statement is provided to the Data Subject in accordance with European and Italian personal data protection legislation to provide adequate information regarding the personal data processed by virtue of Registration with the EASYLIFE Portal.

### PARTIES INVOLVED IN PROCESSING



The Data Controller for the processing of your personal data is GRUPPO PIAZZETTA S.p.a., with its office at Asolo (TV), Via Montello, 22, which may be contacted at the following e-mail address: [privacy@gruppopiazzetta.com](mailto:privacy@gruppopiazzetta.com)

The Company has appointed a data protection officer (DPO), whom you may contact by writing to the address [dpo@gruppopiazzetta.com](mailto:dpo@gruppopiazzetta.com)

### PURPOSES OF DATA PROCESSING AND LEGAL BASIS



Your personal data will be processed for the following purposes:

1. to manage access to and registration with the EASYLIFE Portal, allowing you to extend your warranty, free of charge, beyond the limits established by the laws of each country (hereinafter the "Purpose of the Service");
2. to permit you to receive warranty service and to discharge contractual and/or legal obligations of an administrative, accounting, statutory, tax, regulatory, legislative, Community and/or non-Community nature (hereinafter the "Contractual Purposes");
3. to manage any dispute;
4. to manage and maintain the Portal in order to detect, prevent and otherwise handle fraud, technical or security problems and piracy, thereby contributing to protecting the Data Subject (hereinafter the "Anti-Fraud Purposes");
5. to use your contact information to send you communications of a technical, scientific and/or commercial nature regarding the Data Controller's products and services, in addition to information and/or advertising materials (hereinafter the "Promotional Purposes").

The legal basis of the purposes of data processing is set out below.

Service Purposes	Fulfilment of contractual and/or legal obligations and legitimate interest
Contractual Purposes	Fulfilment of contractual and/or legal obligations and legitimate interest
Dispute Management	Fulfilment of legal obligations and legitimate interest
Anti-Fraud Purposes	Legitimate interest
Promotional Purposes	Consent

**DATA STORAGE PERIOD**



Your data will be stored for the period necessary to discharge legal obligations. If the legal requirements have not been met, the Data Controller shall store the data for a period appropriate to the purposes indicated above and the consent given. In particular, the data will be processed according to the time criteria set out below:

Service Purposes	For the period prescribed by law and according to the time limit for the prescription of the rights arising from the relationship, without prejudice to further storage for the time necessary to resolve (in any manner) any disputes that may arise.
Contractual Purposes	
Dispute Management	
Anti-Fraud Purposes	
Marketing Purposes	Up to 24 months from consent, which may be withdrawn at any time

**NATURE OF PROVIDING THE DATA AND CONSEQUENCES OF REFUSAL**



Providing your data for Service and Contractual Purposes is mandatory. Refusing to provide your data will therefore render it impossible for the Data Controller to provide warranty service and to manage the contractual relationship properly.

Providing your data for Dispute Management Purposes and Anti-Fraud Purposes is mandatory to allow the Data Controller to pursue the legitimate interests cited above. Accordingly, your refusal would render it impossible to manage any disputes properly and to take steps to prevent (potential) fraud.

Providing your data for Promotional Purposes is optional and refusing to provide it and to grant the related consent would render it impossible for the Data Controller to use your contact information to send you technical, scientific and/or commercial communications regarding the Data Controller’s products and services, as well as informational and/or advertising material.

**CATEGORIES OF RECIPIENTS**



Exclusively for the purposes specified above, all the data collected and processed will be disclosed to internal figures authorised to process it according to their respective duties and according to the profiles assigned to them, and also to the following external categories:

- distributors, resellers and assistance centres;
- assistance and sales network;
- software houses and web farms;
- consulting firms;
- professionals and service companies, in addition to public and private entities, including following inspections and audits.

Those of the aforementioned parties that process personal data on the Data Controller’s behalf are appointed data processors.

#### TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES AND/OR INTERNATIONAL ORGANISATIONS



For reasons strictly related to the pursuit of the purposes specified above, some of your data may be transferred to parties established in non-EU countries and/or to international organisations, in accordance with the specific conditions and protections provided for in the GDPR.

The requirement of the lawful transfer of personal data is represented by observing specific safeguards protecting personal data, provided for, in the case of the USA, in the Privacy Shield agreement.

#### RIGHTS OF THE DATA SUBJECTS



The Data Subject is entitled to request that the Data Controller grant him/her access to his/her personal data and rectify the data if it is incorrect, delete it or limit its processing where the requirements have been met, to object to its processing for legitimate interests pursued by the Data Controller and to obtain the portability of the

data if it has been subject to automated processing based on consent or a contract. The Data Subject is also entitled to withdraw consent given for the processing purposes that require it, without affecting the lawfulness of processing based on consent before its withdrawal.

The Data Subject may exercise his/her rights by writing to the Data Controller at the following address: [privacy@gruppopiazzetta.com](mailto:privacy@gruppopiazzetta.com)

The Data Subject is also entitled to file a complaint with the competent supervisory authority, the Italian Personal Data Protection Authority ([www.garanteprivacy.it](http://www.garanteprivacy.it)).

DATE UPDATED: January 2020