

# CARLO PIGNATELLI

**INFORMATION IN ACCORDANCE WITH ARTICLES 12, 13 AND 14 OF EUROPEAN REGULATION (EU) NO. 2016/679.**

**Document updated as of 28/04/2021.**

Dear Interested Party/Customer/User,

We would like to inform you that European Regulation No. 679/2016 (General Data Protection Regulation) lays down rules on the protection of the processing of personal data of natural persons as well as rules on the free movement of such data. Your personal data shall be processed in accordance with the principles of fairness, lawfulness, transparency, purpose limitation and storage, minimisation and accuracy, integrity and confidentiality as required by said Regulation. Furthermore, we would like to remind you that treatment is understood to mean: "any operation or set of operations which is performed upon personal data or sets of personal data, whether or not by automatic means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction," (Article 4, paragraph 2 of the Regulation). We would like to draw your attention to the fact that the data subject to processing by our company may, at times, consist of photographic images, video recordings, collected for institutional purposes, public relations and commercial communications, relating to exhibitions, conferences, fashion shows, museums and events in general. This data may be processed by us in printed and/or audiovisual form by any means of dissemination such as the Internet or social media networks. Obviously, if the event is not of an unequivocally public nature, you shall be provided with adequate information and asked to provide specific consent, which you are free to either give or refuse. Finally, we would like to specify that your data shall be processed in full compliance with the provisions of the Regulation and any other applicable legislation and shall be carried out both with the aid of electronic and automated means and manually. The Data Controller shall implement technical and organisational measures suitable to guarantee a level of security appropriate to the risk of processing, with particular reference to the procedures for access by the designated data processors.

With these premises, in compliance with the requirements of Art.13 of European Regulation No. 2016/679, we would like to specify the information you are entitled to receive regarding the processing of the data you have provided us with, in particular the following information on:

- 1) Who the Data Controller is
- 2) The Existence or non-existence of the Data Protection Officer.
- 3) The purposes for which we process your data and the legal bases that enable us to do so.
- 4) To whom we may disclose your data
- 5) In what geographical area your data may be distributed
- 6) How long we shall keep your data

CARLO PIGNATELLI S.r.l.  
via G. Reiss Romoli, 150  
10148 Torino, Italy  
V.A.T. No. 05084910016  
Economic and Administrative Index No. TO 683303  
Share Capital 1,400,000.00 Euros fully paid-up.  
Tel. +39 011 2292811  
Fax +39 011 2267201  
[www.carlopgnatelli.com](http://www.carlopgnatelli.com)

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- 7) What cookies are and how they are used
- 8) What your rights are and how to exercise them
- 9) When and why the provision of your data is mandatory
- 10) The existence or non-existence of automated decision-making processes

## 1- Who the Data Controller is

The Data Controller is CARLO PIGNATELLI S.P.A.

Should you wish to contact the company, please use the following contact details: Company address: Via Reiss Romoli, 150 - 10148 TURIN (ITALY) - E-mail address: [privacy@carlopnatelli.it](mailto:privacy@carlopnatelli.it) - Tel.: 011 2292811

## 2- The existence or non-existence of the Data Protection Officer.

The company hereby declares that it does not employ a Data Protection Officer.

## 3- The purposes for which we process your data and the legal bases that enable us to do so.

The data you provide shall be processed for the following purposes:

### *a. Pre-contractual and contractual requirements*

Within the scope of these purposes, the data processed are related to your requests for information about our offers and products in the pre-contractual phases, as well as related to the fulfilment of legal obligations in the post-contractual phases. The legal basis of the processing, i.e. that makes the processing lawful, is provided for by Art. 6(1)(b) of the GDPR, which states that "processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract".

### *b. Accounting, administrative and tax requirements.*

Within the scope of these purposes, the data processed relates to the fulfilment of tax obligations required by law, as well as to enable effective administrative management of the contractual relationships established. The legal basis of the processing, i.e. that makes the processing lawful, is provided for by Art. 6 paragraph 1, letter c of the GDPR, which states "the processing is necessary for compliance with a legal obligation to which the controller is subject".

### *c. Commercial (newsletters), marketing, advertising, communication and other marketing-related purposes*

Within the scope of these purposes, the data processed shall concern advertising communications and commercial communications for inherent use, such as invitations and requests to participate in events, video recordings, photographic recordings and the use of the relative images, made during the events we organise and/or participate in. More specifically, this includes, inter alia, the sending of information,

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promotional and advertising material, as well as the sending of newsletters and other promotional and commercial communication initiatives, also by e-mail or telephone. Within the scope of these purposes, the data processed, with specific reference to video and photographic recordings during wedding ceremonies, may also be of a "special" nature (formerly sensitive data), as referred to and defined in Art. 9 paragraph 1) of the Regulation, which reads as follows: "...(omissis)... personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as processing of genetic data, biometric data intended to uniquely identify a physical person, data concerning the health or sex life or sexual orientation of the person". The legal basis of the processing, i.e. that makes the processing lawful, is provided for by Art. 6 paragraph 1, letter a) of the GDPR, which states 'the data subject has given consent to the processing of his or her personal data for one or more specified purposes'.

#### **4- To whom we may disclose your data**

The personal data of the persons concerned/customers/users normally used in the context of our activity are those relating to their personal details, such as, for example and without limitation, the name and surname of the customer or contact person, place and date of birth, home address, telephone and postal numbers, any company name of the company to which they belong, the address of the company headquarters, etc., as well as all accounting, tax and administrative data relating to their position as interested party/customer/user of our company.

The personal data we collect from our customers is not "disseminated", which means that it is disclosed to unspecified persons by any means of transmission. Your personal data may, however, be "communicated", which means that it is disclosed to one or more specific persons, as specified below:

- a) to authorised persons within our structure and in particular to the accounting/administrative staff employed by our Company;
- b) to persons who can access the data by virtue of regulations or legal provisions, always within the limits provided for by the latter;
- c) to parties (service providers) who require access to the data for purposes ancillary to the existing relationship, to the extent strictly necessary to carry out the ancillary tasks entrusted to them;
- d) to our consultants, to the extent necessary for them to carry out their duties with due regard to confidentiality and security;
- e) to other parties either inside or outside the Company who are required to know them in their capacity as organisers and partners in the institutional activities we organise and/or participate in relating to

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courses, meetings, congresses and any other event of an institutional nature deemed necessary and instrumental to our business activities.

More specifically:

- in the case referred to in point a), your data shall be processed by persons formally appointed by our Companies (employees, interns, trainees, in-house professionals and other equivalent persons);
- in the case referred to in point b), by virtue of a legal provision, your data may be communicated to public and private bodies (foundations, social security, welfare and insurance institutions), doctors responsible for health and safety at work, chambers of commerce, the armed forces and the police, national customs and tax offices;
- in the cases referred to in points c), d) and e), your personal data may be communicated to the subjects we appoint and control as external data processors. The latter may include, but are not limited to" labour consultants, tax consultants, data processing centres, cloud data processing and storage service management companies, various service companies, associated, subsidiary or parent companies, retailers, banks and credit institutions, financial and credit insurance companies.

## **5- In what geographical area your data may be distributed**

Your personal data shall only be processed in a national or European context

## **6- How long we shall keep your data**

Your personal data shall be stored:

- for the purposes referred to in point 3) letter a) and h) for a period of time sufficient to guarantee the correct execution of contractual obligations and the fulfilment of related administrative and tax obligations (Civil Code and Anti-Money Laundering Regulations): 10 years.
- for the purposes referred to in letter c), commercial and marketing, i.e. data collected for purposes relating to the sending of informative, promotional and advertising material, as well as the sending of newsletters and other promotional and communication initiatives, without prejudice to your right to exercise revocation of your consent at any time: 24 months.

## **7- What cookies are and how they are used**

No computer techniques for the direct acquisition of personal identification data or user identification systems are used on the [www.carlopnatelli.com](http://www.carlopnatelli.com) website. Once the connection to the website is terminated, the so-called session cookies are not stored. Our computer systems use: cookies to transmit information of a personal nature; persistent cookies of any kind, except those of Google Analytics, a web analysis service provided by Google Inc. ('Google') which uses cookies that are stored on the user's computer to enable statistical analysis in an aggregate form relating to the use of the website visited. The data generated by Google Analytics are stored by Google as set out in its own information on the use of

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cookies. As the independent data controller for the Google Analytics service, Google Inc. makes its own privacy policy available. For further information on how to manage or disable third-party or marketing cookies, please visit [www.youronlinechoices.com](http://www.youronlinechoices.com)

Specific information on Cookies can be found on our website: [www.carloignatelli.com](http://www.carloignatelli.com).

## 8- What your rights are and how to exercise them

You may exercise these specific rights by contacting the Data Controller:

a) Right of access: the right to obtain confirmation from the Data Controller as to whether or not personal data relating to you are currently being processed and, if so, to obtain access to the data and detailed information relating to you, such as the source of the data, the processing purposes, the categories of data processed, the recipients of communications and/or transfers and anything else concerning you.

b) Right of rectification: the right to obtain from the Data Controller the rectification of inaccurate personal data, without undue delay, as well as the integration of incomplete personal data, including by means of a supplementary declaration.

c) Right to erasure ("right to be forgotten"): the right to obtain from the Data Controller the erasure of data in the following cases: the data is no longer necessary in relation to the purposes for which it was collected; consent has been withdrawn and there is no other legal basis which makes the processing lawful; the data has been processed unlawfully: the data must be erased due to a legal obligation;

d) Right to restriction: the right to obtain from the Data Controller the restriction of processing in cases, among others, where the accuracy of the data is contested. Such limitation shall enable the Controller to verify the accuracy of the data. Furthermore, the right to restriction may be invoked if the processing is unlawful and the data subject has objected to the erasure.

e) Right to object: the right to object, at any time, to the processing of data which has as its legal basis a legitimate interest of the Controller and/or to the processing for direct marketing purposes, including profiling.

f) Right to data portability: the right to receive, in a structured, commonly used and machine-readable format, one's own personal data and to transmit such data to another data controller. This right can only be exercised if the processing is based on consent or contract and only with regard to electronic data.

(g) Right to withdraw given consent: right to withdraw previously given consent at any time, without prejudice to the lawfulness of the processing based on the consent given before the withdrawal.

(h) Right to lodge a complaint with a supervisory authority: the right to lodge a complaint with a competent supervisory authority if the data subject considers that processing concerning him/her is in breach of the Regulation. Such right may be exercised through the supervisory authority of the Member State where the person concerned resides or works, or in the State where the alleged infringement took place.

Should you wish to exercise the above rights, or should you wish to receive further clarification regarding the processing of your personal data, you may write to the Data Controller at the following e-mail address:

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[privacy@carlopignatelli.it](mailto:privacy@carlopignatelli.it) or at the address of the above-mentioned registered offices. Alternatively, you can go to the [www.carlopignatelli.com](http://www.carlopignatelli.com) website and download this information sheet, which contains the form you can use to exercise your rights.

## 9- When and why the provision of your data is mandatory

The provision of data is compulsory for what is required by pre-contractual, contractual, accounting, administrative and fiscal requirements, points a) and b) of the purposes, therefore, any refusal would make it impossible for our Company to establish and/or continue the business relationship. The conferment of other data, not attributable to legal and contractual obligations, but referring to commercial and marketing, advertising, promotional activities, the identification of the degree of customer satisfaction and also regarding the participation in events, demonstrations and wedding ceremonies, and other relevant activities, in point c) of the purposes.

## 10- The existence or non-existence of automated decision-making processes

Within the scope of our business activities, there are no automated decision-making processes, including profiling, as referred to in Art. 22 paragraphs 1 and 4...

Turin, 28th April 2021.

The Data Controller

CARLO PIGNATELLI S.r.l.

THE CHIEF EXECUTIVE OFFICER

CARLO PIGNATELLI  
S.r.l.  
L'AMMINISTRATORE



Turin, 28th April 2021.

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## CONSENT FORM

The undersigned, \_\_\_\_\_

Tax code: \_\_\_\_\_

hereby declares to have received information pursuant to Articles 12, 13 and 14 of European Regulation No. 2016/679, and more specifically:

1) hereby gives his/her consent to the processing of his/her personal data, including particular sensitive data, for the purposes indicated in the aforementioned information notice, with specific reference to point c) of paragraph 3)

GIVES HIS/HER CONSENT

DENIES HIS/HER CONSENT

Signature \_\_\_\_\_

Place \_\_\_\_\_ Date \_\_\_\_\_