



PRIVACY POLICY



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Information on the processing of personal data

Dear user, in compliance with the provisions of the EU Regulation 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, we hereby inform you about the processing of your data in order to guarantee the protection of your rights and freedoms. More precisely, we inform you about the categories of data processed, the purposes, the methods, the nature of the provision, the integrity and confidentiality, the scope of communication and dissemination, the possibility of data transfer to third countries, the retention period and the existence of profiling processes.

Purpose of collection

Your data is collected solely as a result of your subscription/registration to the “Sensi Today” newsletter, for information purposes such as updates on events, activities and everything related to our company as well as to respond to your explicit requests.

Methods of processing

Your personal data will be processed in accordance with the principles laid down in the Regulation. More precisely, they will be:

- a) processed lawfully, fairly and in a transparent manner in relation to the data subject («**lawfulness, fairness and transparency**»);
- b) processed in a manner that is not incompatible with the purposes for which they are processed («**purpose limitation**»);
- c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed («**data minimisation**»);
- d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay («**accuracy**»);
- e) kept in a form which permits your identification for no longer than is necessary for the purposes for which the personal data are processed; («**storage limitation**»);
- f) processed in a manner that ensures appropriate security of your personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures («**integrity and confidentiality**»).

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The Data Controller is responsible for the above-mentioned modalities («**accountability**»).

Lawfulness, fairness and transparency of data (nature of the provision)

Once supplied, your data will be consequently processed by our company only after you have entered your name and e-mail address in the spaces provided for this purpose and after you have ticked the box requesting to subscribe to the newsletter of Sensi Vigne & Vini s.r.l., after having read and understood this document contained in the link, which must be followed by ticking the appropriate box.

Should you decide that you are no longer interested in the newsletter service, you may at any time withdraw your consent and your subscription to the service with the same ease with which the consent has been granted. More precisely, you should send your request to the e-mail address privacy@sensivini.com, as well as any changes due to inaccurate data or updates of the same.

To this end, we also inform you that future withdrawal of consent shall not affect the lawfulness of processing based on the consent previously granted.

Limitation of personal data processing

This data will only be used for the purposes mentioned above. Should the same be necessary for further purposes not provided for herein, Sensi Vigne & Vini s.r.l. will ask you to expressly express your consent to said further processing.

Accordingly, in accordance with the principle of data minimisation, when registering for the newsletter, you will be asked for adequate, relevant and limited data for the above-mentioned purpose, in accordance with Art. 5 para. 1 letter c. (name and e-mail address).

Data integrity and confidentiality

Your data will be kept by our company on special storage servers and stored in backup copies.

These personal data shall also be controlled by Sensi Vigne & Vini s.r.l., also in relation to the knowledge acquired on the basis of technical progress, the nature of the data and the specific characteristics of the processing, so as to minimise, through the adoption of suitable and preventive security measures, the risks of destruction or loss, even accidental, of data, of unauthorised access or processing that is not allowed or is not in compliance with the purposes of the collection.

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To this end, we have planned a careful risk analysis of the newsletter production process according to the principle of privacy by design in order to ensure the fairness, integrity, confidentiality and security of the data as well as their effective deletion when required.

The analysis is concretely implemented by drawing up and updating the processing activity register, which describes the processing carried out and the security procedures adopted.

Scope of data communication and dissemination

When subscribing to the newsletter, the data you provide will only be processed by employees and/or collaborators, who are specifically responsible for the management of the website and the newsletter as well as the automated means such as e-mails, servers and computers.

Your personal data may not be disclosed or communicated to third parties by our company, except when required to comply with obligations imposed by law, by EU regulations and provisions, in order to obey orders from legitimate public authorities or to assert a right during judicial proceedings.

Data transfer outside the EU

In no case, your personal data will be transferred to third countries not belonging to the European Union or to international organizations. Should a cross-border transfer be necessary in the future, we will ask you to give your explicit and informed consent. Such a transfer must, however, comply with the new articles referred to in paragraph V, which aim to ensure the effective protection of your data.

Retention period

The data you provide will be kept for the time strictly necessary for the provision of the newsletter service and, more generally, in accordance with the law, the EU regulations or specific provisions issued by the Data Protection Authority.

Rights of the data subject

We hereby inform you that you may at any time exercise the rights expressly provided for in EU Regulation 2016/679, Articles 13 to 23 transcribed in the [link given here](#).

Therefore, you may:

- request access to your data, rectification, erasure, integration of incomplete data, restriction of the processing only for the purposes expressed above, receipt of the data in a structured, commonly used

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and machine-readable format as well as object in whole or in part to the processing of the data;

- lodge, alternatively, a complaint with the supervisory authority (Art. 77), an effective judicial remedy against the supervisory authority (Art. 78) and/or an effective judicial remedy against the data controller or processor, following the procedures and instructions of the Supervisory Authority;
- withdraw consent without affecting the lawfulness of processing based on consent before its withdrawal.

Procedures for exercising rights and replying

Your rights may be exercised by e-mail, pec or registered letter with return receipt to be sent to the following e-mail privacy@sensivini.com or to the address where the registered office is located; to facilitate such process, please [download the attached form](#).

Sensi Vigne & Vini s.r.l., directly or through a representative, will provide you with the information regarding the request submitted without undue delay and, in any case, within 30 days of receipt of the request.

This deadline may be extended by a further 60 days if necessary, taking into account the complexity and number of requests. If this is the case, we will inform you of this extension and the reasons for the delay, within 30 days of receipt of the request.

If we are unable to comply with your request, we shall inform you without delay and, at the latest within 30 days of receipt of the request, of the reasons for non-compliance and of the possibility of lodging a complaint with a supervisory authority and of seeking judicial remedy.

If you make your request by electronic means, the information will be provided, where possible, by electronic means unless otherwise requested by you.

The information provided to you and any communication/action taken will be free of charge.

If your requests prove to be manifestly unfounded or excessive, in particular due to their repetitive nature, our company may:

- a) charge a reasonable fee, taking into account the administrative costs of providing the information or communication or taking the requested action;
- b) refuse to act on the request.

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To this end, the data controller shall bear the burden of demonstrating that the request is manifestly unfounded or excessive.

Where Sensi Vigne & Vini s.r.l. has reasonable doubts about your identity, as you are exercising your rights making the request referred to in Articles 15 to 21, it may request you further information in order to confirm your identity.

Data Controller and Processor

The Data Controller is Sensi Vigne & Vini s.r.l., F.C./VAT: 00183820471, with registered office in Lamporecchio (PT), 51035, Via Cerbaia n. 107, in the person of its legal representative Mr. Pietrino Sensi.

The document containing the Register of Processing Activities and the list of appointed data processors is available at the aforementioned Controller.

For further information, you may consult the website <http://www.garanteprivacy.it>. and the FAQs of the Data Protection Authority: EC Regulation, European Parliament 27/04/2016 no. 679, O.J. 04/05/2016 - General Data Protection Regulation.