

PRIVACY INFORMATION

In accordance with the current legislation regarding the protection of personal data, Distilleria Varnelli S.p.A. with its legal office in P.zza Vittorio Veneto, 13 – 62031 Valfornace (MC) and operating office in Via Girolamo Varnelli, 10 - 62034 Muccia (Mc), in the person of its legal representative pro tempore, (referred to as "Company" or "Owner "), provides users who wish to receive information on the goods and services offered by the Company through the appropriate form on the website www.varnelli.it (hereinafter also the "website "), information relating to the processing of data.

What data are processed, for what purposes, and based on what legal processing?

The personal data, being identification provided by the interested party through the form on the site, are used to follow up on the request of the interested party. The collection will cover only common data. Therefore the person concerned will not have to indicate any specific personal data - which may be data suitable for detecting the race and ethnic background, religious beliefs, philosophical or otherwise, political opinions, membership of parties, unions, associations or organizations religious, philosophical, political or trade union, as well as personal data suitable for revealing the state of health and sex life of the user - which will nonetheless, even in the instance of accidental sending, immediately be canceled by the holder.

Communication:

The data will not be disclosed. The data may be disclosed to third parties if the communication is necessary in order to implement the specific requests of the user or if the third parties act as data controllers.

The user may request the data controller to list any parties who carry out their activity on behalf of the data controller as data controllers.

Methods of data treatment, storage times and place of treatment:

The collected data are processed with computer software and only peripherally with paper methods. Appropriate security measures are observed to prevent data loss, illicit or incorrect use, and unauthorized access.

The data will be processed only by authorized parties and kept strictly only for the time necessary to process the requests of the interested party.

Regarding the processing of data related to the services of the website, the Owner uses servers located within the European territory. The transfer of data abroad is not foreseen.

Nature of conferment:

The provision of data is optional and the data entered are used by the Data Controller for the sole purpose of satisfying any requests made and to implement the legal obligations and/or pre-contractual obligations and/or contractual obligations arising from the legal relationship in the constituted case.

Rights of the involved party

The law grants to the involved party the right to request the data controller to access personal data and to correct or cancel it or limit the processing of data or to oppose its processing, in addition to the right to data portability.

More precisely, the involved party has:

- **The right of access**, which means the right to obtain from the holder managing the processing of data the confirmation whether or not a personal data treatment is in progress and, in this case, to gain access to personal data and to following information: a) processing purposes; b) categories of the concerned personal data; c) recipients or categories of recipients to whom the personal data have been or will be communicated, in particular if they are recip-

ients of third countries or international organizations; d) where possible, period of preservation for the personal data provided or, if not possible, for the criteria used to determine this period; e) right for the interested party to involve the holder processing the data for adjusting or deleting his personal data or for limiting this treatment or for opposing it; f) right to lodge a complaint with a supervisory authority; g) if the data are not collected from the interested subject, all information available on their origin; h) existence of an automated decision-making process, including profiling and, at least in such cases, crucial information on the used logic, as well as the importance and the expected consequences of such processing of data for the subject.

If personal data are transferred to a third country or to an international organization, the interested subject shall have the right to be informed about the existence of adequate guarantees related to the transfer.

- **The right to correction**, which means the right to obtain from the holder processing the data the correction of inaccurate personal data about him without undue delay. Taking into account the purposes of the processing, the subject has the right to obtain the integration of their incomplete personal data, also by providing an additional declaration.
- **The right to erasure**, which means the right to obtain from the holder processing the data the deletion of his personal data without undue delay if: a) personal data are no longer necessary with respect to the purposes for which they were collected or otherwise processed; b) the interested party revokes the consent which is basis of the treatment and if there is no other legal basis for the processing; c) the interested party opposes the processing carried out because it is necessary for the execution of a task of public interest or connected to the exercise of public authority investing the holder or for the pursuit of legitimate interest and there is no legitimate prevailing reason to proceed with processing, or they oppose to the processing for direct marketing purposes; d) personal data have been processed unlawfully; e) personal data must be deleted to fulfil a legal obligation under Union or Member State law to which the holder who processes the data is subject; f) personal data have been collected in relation to the provision of services from the society of information to children. However, the request for deletion cannot be accepted if the treatment is necessary: a) for the exercise of the right to freedom of expression and information; (b) for the fulfilment of a legal obligation requiring treatment under Union or Member State law to which the holder is subject or for the performance of a task carried out in the public interest or in the exercise of official authority investing the holder who processes the data; c) for reasons of public interest in the public health sector; d) for archiving purposes in the public interest, for scientific or historical research or for statistical purposes, as far as the deletion risks to make it impossible or seriously prejudices the achievement of the tasks for such treatment; or e) for the assessment, exercise or protection of a right in court.
- **The right of limitation**, which means the right to obtain that the data are processed, except for storage, only with the consent of the interested party or for the assessment, exercise or protection of a right in court or to protect the rights of another natural or legal person or for reasons of significant public interest of the Union or a Member State if: a) the data subject disputes the accuracy of personal data for the period necessary to the controller to verify the accuracy of such personal data; b) the treatment is illegal and the interested party opposes the deletion of personal data requesting instead the limitation of its use; c) although the holder processing the data no longer needs them for processing purposes, personal data are necessary for the interested party to ascertain, exercise or defend a right in court; d) the interested party has opposed the treatment, because this is necessary for the management of a public task or it is related to the exercise of public authority involving the owner or for the pursuit to legitimate interests of the holder who processes the data or of third parties, waiting for the confirmation stating a possible prevalence of the legitimate reasons for the holder in comparison with those of the interested party.
- **The right to portability**, which means the right to receive, in a structured, commonly and automatically readable form, their personal data provided to the holder and they have the right to transmit such data to another holder without obstacles created from the holder managing them, as well as the right to obtain the direct transmission of personal data from one holder to another, if technically possible, if the processing is based on consent or on a con-

tract and the processing is done by automated means. This right is without prejudice to the right of deletion.

- **The right of opposition**, which means the right of the interested party to oppose at any time, for reasons connected with their particular situation, their personal data processing, because this is necessary for the management of a public task or it is related to the exercise of public authority for which the holder is involved or for the pursuit to legitimate interests of the holder processing the data or of third parties. If personal data are processed for direct marketing purposes, the interested party has the right to oppose at any time to the processing of their personal data for such purposes, including profiling, as far as it is related to such direct marketing.

The interested party can assert his rights at any time, without formalities, by contacting the holder who processes the data, to the email address varnelli@varnelli.it .

The interested party is then informed that the law recognizes to them the possibility of asserting their rights through an appeal to the Privacy Guarantor or before the judicial authority.

Who is the data holder and how is it possible to contact them?

The data holder is **Distilleria Varnelli S.p.A.** with legal headquarters in P.zza Vittorio Veneto, 13 – 62031 Valfornace (MC) and operations headquarters in Via Girolamo Varnelli, 10 - 62034 Muccia (Mc). It is possible to contact the data holder by email at varnelli@varnelli.it or by fax at the number 0737-647107.

Further information on personal data treatment can be found on the page related to the [privacy policy](#).