

# DISCLOSURE PAPER ON THE PROCESSING OF PERSONAL DATA

for users who browse the websites of **VICENZI Spa**

pursuant to Article 13 of Regulation (EU) 2016/679

## REASON FOR THIS DISCLOSURE PAPER

Pursuant to Regulation (EU) 2016/679 (hereinafter referred to as the "Regulation"), this paper describes the methods for processing users' personal data who consult the websites of **VICENZI Spa** accessible by IT means at the following addresses:

- [www.vicenzi.it](http://www.vicenzi.it)
- [www.matildevicenzi.it](http://www.matildevicenzi.it)
- [www.matildevicenzi.com](http://www.matildevicenzi.com)
- [www.grisbi.it](http://www.grisbi.it)
- [www.mrday.it](http://www.mrday.it)

This paper does not relate to any other site, page or online service accessible through the hypertext links that may be published on the aforementioned sites that refer to external resources to the domains owned by **VICENZI Spa**.

## DATA CONTROLLER

The Data Controller is **VICENZI Spa** with its headquarters in Via Forte Garofalo, 1 37057 - San Giovanni Lupatoto (VR). The complete and updated list of Data Officers is available by requesting the Data Controller at tel. 045 8262800 - [MARKETING@VICENZI.IT](mailto:MARKETING@VICENZI.IT)

## DATA PROTECTION OFFICER (DPO)

**VICENZI Spa** has not appointed a Data Protection Officer as this appointment is considered as not applicable in the case of **VICENZI Spa**.

## PURPOSE, LEGAL BASIS AND OBLIGATORY OR OPTIONAL NATURE OF DATA PROCESSING

The Personal Data you provide through the Website will be processed by **VICENZI Spa** for the following purposes:

1. Management and execution of activities deriving from pre-contractual and contractual obligations, including the supply of goods or services and every activity connected thereto (order management, sending of purchased goods, management of returns, request for contact through the Contact forms, etc.);
2. Analysis of consumption preferences made through an automated decision-making process including profiling for which specific consent will be required;
3. Publications of images and personal data on **VICENZI Spa**'s institutional sites listed above (e.g. recipes or advice) are exclusively the result of specific consent;
4. Provision of nutritional information and the relative availability of products with regard to reported intolerances or allergies, for the management of which specific consent will be required;
5. Sending of commercial communications of an informative and/or promotional nature also in the form of newsletters, exclusively with specific consent, which can be expressed by filling in optional fields provided at the bottom of the forms on the relative websites;
6. Management of spontaneous job applications;
7. Compliance with a legal obligation that **VICENZI Spa** is accountable to;
8. Need to ascertain, exercise or defend a right in court

The legal basis for the processing of Personal Data with regard to the purposes referred to in point 1) is the provision of a service or the response to a request that does not require consent under the Applicable Regulation; for the purposes 2), 3), 4), 5) specific consent will be required; for the purpose 6) specific consent is not necessary excluding the case where specific data is reported within a CV, the processing thereof requires specific consent in accordance with the authorisations in force; finally, the purposes set out in points 7) and 8) represent a legitimate processing of Personal Data under the Applicable Regulations as, once the Personal Data has been transferred, the processing is necessary to fulfil a legal obligation to which **VICENZI Spa** is subject to or exercise their right to defence in court. The provision of Personal Data for the purposes listed above is optional, but their failure to provide it as such could render it impossible to meet a User's request or fulfil a legal obligation to which **VICENZI Spa** might be subject to.

## **DURATION OF DATA RETENTION**

Personal Data collected for purposes related to the performance of a contract between the Data Controller and the data subject will be retained until the performance of such a contract is completed.

When the processing is based on the User's consent, the Data Controller may retain the Personal Data for a longer period until such consent is revoked. In addition, the Data Controller may be required by law or by order of an authority to retain Personal Data for a longer period of time.

For profiling and marketing activities, data will be stored for 1 and 2 years respectively.

For the management of CVs, information will be kept for a maximum of 6 months.

Personal Data collected for purposes related to the legitimate interest of the Data Controller will be retained until such interest is met. The User can obtain further information regarding the legitimate interest pursued by the Data Controller by contacting the same.

## **TYPES OF DATA PROCESSED**

### *Browsing data*

During their normal operation, computer systems and software procedures used to operate the websites acquire certain personal data, the transmission of which is implicit in the use of internet communication protocols.

This category of data includes IP addresses or domain names of computers used by website users, the URI/URL (Uniform Resource Identifier/Locator) of requested resources, the time of request, the method used to submit the request to the server, the size of the file received in reply, the numerical code indicating the status of the reply given by the server (successful, error, etc.) and other parameters regarding the operating system and computer environment of the user.

### *Cookies and other tracking systems*

For the description of the types of cookies and their use, please refer to the relative [cookie policy](#) for each website.

### *Data communicated by the user*

The optional, explicit and voluntary sending of messages to the contact addresses of **VICENZI Spa**, involves the acquisition of the sender's contact information for a reply, as well as all personal data included in communications.

The website pages set up for the provision of certain services are equipped with data collection forms. These forms are accompanied by a link that refers to this Privacy Policy in addition to specific requests for optional consent.

## **DATA RECIPIENTS**

The data collected will be communicated to external subjects who will act as external Data Processing Officers. The list of DPOs is available upon request to the Privacy office.

The personal data collected is also processed by **VICENZI Spa** staff, acting on the basis of specific instructions provided for the purposes and methods of the processing itself.

## **RIGHTS OF DATA SUBJECTS**

The data subjects have the right to obtain from **VICENZI Spa**, in the cases provided for, access to personal data and the correction or cancellation of the same or the limitation of processing that concerns them or to oppose the processing (pursuant to Articles 15-22 of the Regulation).

## **RIGHT TO LODGE A CLAIM**

Data subjects who believe that the processing of personal data referring to them through this site is in violation of the provisions of the Regulation have the right to lodge a claim with the Guarantor, as provided for by Article 77 of the Regulation, or to take appropriate judicial offices (Article 79 of the Rules).