

Customer Privacy Policy

1. WHY WE PROVIDE THIS INFORMATION

Dear Customer, pursuant to Regulation (UE) 2016/679 (hereinafter Regulation or GDPR), with this document we want to illustrate the methods adopted by our organization for the processing of personal data collected to satisfy requests for products and services offered by SIRIO SRL.

2. PRINCIPLES APPLICABLE TO PROCESSING ACTIVITIES

The processing of personal data takes place in compliance with the principles under Article 5 of the Regulation (UE) 2016/679, which are briefly summarized below:

- lawfulness, correctness and transparency of the processing, towards the interested party;
- limitation of the purpose of the processing, including the obligation to ensure that any subsequent processing is not incompatible with the purpose of the data collection;
- limitation of data: otherwise the data must be adequate, relevant and limited to what is necessary with respect to the purposes of the processing;
- accuracy and updating of the processing data, including the timely deletion of data that are not accurate with respect to the purposes of the processing;
- limitation of conservation: it is necessary to provide the conservation of the data for a period of time not exceeding the necessity with respect to the purposes for which the treatment was carried out;
- integrity and confidentiality: the adequate security of the personal data being processed must be guaranteed.

3. DATA CONTROLLER

The data controller holder is:

SIRIO SRL UNIPERSONALE - Zona Ind.le Bretella n. 4 86020 San Polo Matese (CB). Tel: 0874.772030, mail:info@csnutrition.com

4. PURPOSE AND LEGAL BASIS

Personal data are processed:

a. without consent [art. 6 lett. B) GDPR], for the following purposes:

- fulfill contractual and pre-contractual obligation;
- fulfill tax obligations deriving from existing relationships;
- fulfill the obligations established by law, by a regulation, by community legislation or by an order of the Authorities;
- exercise the rights of the Data Controller, for example the right to defense in court;

b. only subject to specific and distinct consent (Article 7 of the GDPR), for marketing purposes by sending e-mails, posts and/or text messages and/or telephone contacts, newsletters, commercial communication and/or advertising material on products or services offered by our company.

The legal basis that justifies the treatments described is represented by the contractual and commercial relationship established with your organization.

5. RECIPIENTS OF THE DATA

The data can be processed by:

- **employees and collaborators**, who will act in their capacity as authorized data processing personnel (and so called "persons in charge of processing") as well as consultants appointed by the Data Controller who needs to process Personal Data for the performance of their duties.
- **external subject** operating as owners such as, by way of example, supervisory and control authorities and in general subject internal or external entitled to request data;
- **external subject** designated as data processors pursuant to art.28 of the GDPR, to whom adequate operating instructions are given: labor consultants, business consultant, companies providing software and applications for accounting and administration;

The complete list of data processors is available at the company headquarter listed in point 3.

6. DATA RETENTION PERIOD

The personal data processed will be kept for the time necessary to fulfill the aforementioned purposes, and for a subsequent period of up to 10 years to fulfill the conservation obligations provided for by civil, fiscal and tax regulations.

7. TRANSFER OF PERSONAL DATA TO A THIRD COUNTRY OR TO AN INTERNATIONAL ORGANIZATION

Personal data are stored, both in paper and electronic form, in the rooms specifically used for the processing of our organization, and at the aforementioned external subjects, all currently located in EU and subject to the protection of the GDPR.

8. PROFILING ACTIVITIES

Personal data acquired are not subject to automated decision making process, including the "profiling" which consist of a form of automated processing of personal data that evaluates personal aspects concerning a natural person, in particular in order to analyze or predict aspects concerning professional performance, the economic situation, health, personal preferences or

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interest, reliability or behavior, location or movements of the interested party, where this produces legal effects that concern him/her or similarly significant affects this person.

9. RECOGNIZED RIGHTS AND METHOD OF EXERCISE

Data subjects, in addition to the right to lodge a complaint with a supervisory authority, can exercise the following rights:

Art. 15 Right to access- the interested party has the right to obtain from the data controller confirmation as to whether or not personal data concerning him/her is being processed and, in this case, to obtain access to personal data and information regarding the processing.

Art. 16 Right of rectification - the interested party has the right to obtain from the data controller the correction of inaccurate personal data concerning him/her without undue delay. Taking into account the purposes of the processing, the interested party has the right to obtain the integration of incomplete personal data, also by providing an additional declaration.

Art. 17 Right of cancellation – the interested party has the right to obtain from the data controller the cancellation of personal data concerning him/her without undue delay and the data controller is obliged to cancel without undue delay.

Art. 18 Right to limitation of treatment – the interested party has the right to obtain from the data controller the limitation of treatment when one of following hypotheses occurs:

- a) the data subject disputes the accuracy of the personal data, for the period necessary for the data controller to verify the accuracy of such personal data;
- b) the processing is unlawful and the interested party opposed the cancellation of personal data and requests instead that its use is limited;
- c) although the data controller no longer needs it for processing purposed, the personal data are necessary for the data subject to ascertain, exercise or defend a right in court;
- d) the interested party opposed the processing pursuant to article 21, paragraph 1 of the regulation, pending verification of the possible prevalence of the legitimate reason of the data controller with respect to those of the interested party.

Art. 20 Right to data portability – the interested party has the right to receive in a structured format, commonly used and readable by an automatic device, the personal data concerning him/her provided to a data controller and has the right to transfer such data to another data controller without impediments by the data controller to whom he/she provided.

Art. 21 Right to object - the interested party has the right to object at any time, for reasons connected with his/her particular situation, to the processing of personal data concerning him/her including profiling on the basis of these provisions.

Art. 22 Right not to be subjected to automated decision-making, including profiling – the interested party has the right not to be subjected to a decision based solely on automated processing, including profiling, which produces legal effects concerning him/her or which significantly affects this person in a similar way.

The rights can be exercised by making a request directly to the Data Controller, who can be contacted at the addresses indicated in point 3.

The interested party may file a complaint with the GURANTOR FOR THE PROTECTION OF PERSONAL DATA (www.garantepivacy.it) OR THE EUROPEAN DATA PROTECTION SUPERVISOR (www.edps.europa.eu).

10. LEGAL/CONTRACTUAL OBLIGATIONS OR NECESSARY REQUIREMENTS FOR THE CONCLUSION OF A CONTRACT

The provision of data for the purposes referred to in point 4_a is mandatory. In their absence, it will not be possible to carry out the envisaged treatments, making the services provided for the commercial relationship or the fulfillment of the legal obligations.

For the marketing purposes expressed in point 4_b the provision of data is optional and is linked to specific consents that can be revoked at any time.