

Lucart Privacy Policy

POLICY ON PERSONAL DATA PRODUCTION PURSUANT TO ARTICLE 12 et seq. OF
REGULATION (EU) 679/2016

LUCART SPA, with registered office in Via Ciarpi 77 (VAT and Taxpayer's ID no. 00145780466) in the person of its legal representative, as Data Controller, has always been very thorough about aspects of personal data protection and respect for the principles of confidentiality and personal dignity.

Under the new Regulation (EU) 679/2016, in accordance with the principle of accountability, any processing of personal data must be lawful and correct. It must be transparent to natural persons that personal data concerning them are collected, used, consulted or otherwise processed and to what extent the personal data are or will be processed.

The principle of transparency requires that any information and communication relating to the processing of those personal data be easily accessible and easy to understand, and that clear and plain language be used.

That principle concerns, in particular, information to the data subjects on the identity of the controller and the purposes of the processing and further information (cf. Article 13 and 14 of Regulation (EU) 679/2016) to ensure fair and transparent processing in respect of the natural persons concerned and their right to obtain confirmation and communication of personal data concerning them which are being processed (Cf. Article 39, Regulation (EU) 679/2016).

In this perspective, you are invited to read the following policy.

LUCART S.p.A., with registered office in Via Ciarpi 77 (VAT and Taxpayer's ID no. 00145780466) in the person of its legal representative, as Data Controller, pursuant to and for the purposes of Regulation (EU) 2016/679, hereby informs the data subjects that the personal data concerning them, acquired by the Data Controller or that will be requested later and/or communicated by third parties, are necessary and will be used for the purposes indicated below.

BROWSING DATA

During their normal operation, the computer systems and software procedures used to operate this website acquire some personal data for communication which is implicit in the use of Internet communication protocols. This information is not collected for association with identified parties, those concerned, but may by their nature, through processing and association with data held by

third parties, permit the identification of users. This category of data includes IP addresses or the domain names of the computers of the users connecting to the website, the URI (Uniform Resource Identifier) addresses of the required resources, the time of the request, the method used to submit the request to the server, the size of the file obtained as a reply, the numeric code of the status of the reply sent by the server (ok, error, etc.) and other parameters linked with the user's OS and computer processing environment. These data are only used to obtain anonymous statistical information on the website's use and to check its correct functioning to identify anomalies and/or abuse. They are deleted immediately after the processing.

DATA PROVIDED VOLUNTARILY BY THE USER

The possible sending of communications to the contacts indicated on the website involves the acquisition of the e-mail address and other personal data contained in the communication.

Specific summary statements will progressively be indicated or displayed on the specific pages of the website for particular services on request.

PURPOSE AND LEGAL BASIS OF PROCESSING

According to Regulation (EU) 679/2016, personal data:

- Are processed lawfully, fairly and in a transparent manner in relation to the data subject (Article 5);
- Are collected for specific, explicit and legitimate purposes and subsequently processed in a way that is not incompatible with those purposes (Article 5).

The data are collected for the following purposes:

- Pursuit of purposes instrumental and/or complementary to the activities functional to the performance of the existing contractual/pre-contractual relationship;
- General accounting, invoicing, credit management, statutory and tax obligations required by law and for updating records;
- Surveys on data subject's satisfaction with the quality of the product and services provided by the writer, including statistical analysis;
- Performing marketing activities with particular reference to the sending of newsletters;
- Candidates can upload their resumes in the "Join us" section.
- Data are processed for the sending of service communications, for the management of requests for clarification, reports and complaints in relation to the contractual relationship established, as well as for its performance.

Any personal data that may refer to the data subject or that may be collected from him/her, subject to consent, may be used for marketing purposes (i.e., merely by way of example, for the promotion of advertising and commercial events, the sending of advertising campaigns,

promotions and offers), which may be carried out by the Controller either by automated means or through traditional methods.

PROCESSING METHODS AND CONFIDENTIALITY OBLIGATIONS

Data processing is carried out by means of computer instruments and/or paper supports, by entities committed to confidentiality, according to rationales related to the purposes and in any case in such a way as to ensure the security and confidentiality of the data. The data collected shall not be disclosed and disseminated to third parties in accordance with the law.

COMMUNICATION TO THIRD PARTIES

Your personal data may be communicated to third parties known to us only and solely for the aforementioned purposes and, specifically, to the following categories of subjects:

- Lucart Group companies;
- External service providers;
- Bodies and Public Administrations for legal obligations;
- Professionals providing support for legal obligations;
- Companies providing support for legal and contractual obligations.

These entities shall process your personal data as external Data Processors or as autonomous Data Controllers.

STORAGE TIME

In accordance with Article 5 of Regulation (EU) 679/2016, "*Principles relating to processing of personal data*", personal data shall be kept in a form that allows the identification of data subjects for no longer than is necessary for the purposes for which the data are processed.

The personal data of data subjects may also be stored for longer periods in compliance with the requirements of the law in force (for example, with regard to accounting).

RIGHTS OF THE DATA SUBJECT

In accordance with the regulations in force, the data subject may assert their rights towards the Controller, as expressed by Regulation (EU) 679/2016, i.e.:

RIGHT OF ACCESS

Article 15

The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information:

- a) the purposes of the processing;
- b) the categories of personal data concerned;
- c) the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
- d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- e) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
- f) the right to lodge a complaint with a supervisory authority;
- g) where the personal data are not collected from the data subject, any available information as to their source;
- h) the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

1. Where personal data are transferred to a third country or to an international organisation, the data subject shall have the right to be informed of the appropriate safeguards pursuant to Article 46 relating to the transfer.
2. The controller shall provide a copy of the personal data undergoing processing. For any further copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs. Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form. The right to obtain a copy shall not adversely affect the rights and freedoms of others.

RIGHT OF RECTIFICATION

Article 16

The data subject shall have the right to obtain from the Controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

RIGHT TO ERASURE

Article 17

1. The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies:
 - a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
 - b) the data subject withdraws consent on which the processing is based according to point (a) of Article 6(1), or point (a) of Article 9(2), and where there is no other legal ground for the processing;
 - c) the data subject objects to the processing pursuant to Article 21(1) and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2);
 - d) the personal data have been unlawfully processed;
 - e) the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject;
 - f) the personal data have been collected in relation to the offer of information society services referred to in Article 8(1).
2. Where the controller has made the personal data public and is obliged pursuant to paragraph 1 to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers which are processing the personal data that the data subject has requested the erasure by such controllers of any links to, or copy or replication of, those personal data.
3. Paragraphs 1 and 2 shall not apply to the extent that processing is necessary:
 - a) for exercising the right of freedom of expression and information;
 - b) for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
 - c) for reasons of public interest in the area of public health in accordance with points (h) and (i) of Article 9(2) as well as Article 9(3);
 - d) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) in so far as the right referred to in paragraph 1 is likely to render impossible or seriously impair the achievement of the objectives of that processing; or;
 - e) for the establishment, exercise or defence of legal claims.

RESTRICTION OF PROCESSING

Article 18

1. The data subject shall have the right to obtain from the controller restriction of processing where one of the following applies:
 - a) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
 - b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
 - c) the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
 - d) the data subject has objected to processing pursuant to Article 21(1) pending the verification whether the legitimate grounds of the controller override those of the data subject.

2. Where processing has been restricted under paragraph 1, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.
3. A data subject who has obtained restriction of processing pursuant to paragraph 1 shall be informed by the controller before the restriction of processing is lifted.

RIGHT TO DATA PORTABILITY

Article 20

1. The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where:
 - a) the processing is based on consent pursuant to point (a) of Article 6(1) or point (a) of Article 9(2) or on a contract pursuant to point (b) of Article 6(1); and
 - b) the processing is carried out by automated means.
2. In exercising his or her right to data portability pursuant to paragraph 1, the data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.
3. The exercise of the right referred to in paragraph 1 of this Article shall be without prejudice to Article 17. That right shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.
4. The right referred to in paragraph 1 shall not adversely affect the rights and freedoms of others.

OPPOSITION TO PROCESSING

Article 21

1. The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on point (e) or (f) of Article 6(1), including profiling based on those provisions. The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.
2. Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing.
3. Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.
4. At the latest at the time of the first communication with the data subject, the right referred to in paragraphs 1 and 2 shall be explicitly brought to the attention of the data subject and shall be presented clearly and separately from any other information.
5. In the context of the use of information society services, and notwithstanding Directive 2002/58/EC, the data subject may exercise his or her right to object by automated means using technical specifications.
6. Where personal data are processed for scientific or historical research purposes or statistical purposes pursuant to Article 89(1), the data subject, on grounds relating to his or

her particular situation, shall have the right to object to processing of personal data concerning him or her, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

In addition to the aforesaid rights, the data subjects are entitled to revoking their consent upon appropriate request, as well as to lodge a complaint with the Supervisory Authority if required by law.

To exercise their rights, the data subjects may download the appropriate form (click here to download the form for the exercise of rights) and send it to privacy@lucartgroup.com.

CONTROLLER AND PRIVACY COMMUNICATIONS

The controller is LUCART S.p.A. with registered office in via Ciarpi 77 (VAT and Taxpayer's ID no. 00145780466) in the person of its legal representative, as Data Controller.

For communications privacy@lucartgroup.com.

The Data Protection Officer appointed by LUCART S.p.A. may be contacted at: dpo@lucartgroup.com