

PRIVACY NOTICE

MARTINELLI LUCE S.P.A. with registered office in Lucca, via Teresa Bandettini, VAT Registration No. 00230590465, in person of its pro-tempore legal representative, e-mail address: privacy@martinelliluce.it in its capacity as Data Controller, hereby gives Users visiting the www.martinelliluce.it website this privacy notice relating to personal information on identified or identifiable data subjects, pursuant to Regulation 679/2016 ("GDPR") and personal data protection legislation.

This privacy notice is only relating to the website www.martinelliluce.it. To view the privacy policy of the www.martinelliluce-outlet.it website, Users are invited to visit <http://www.martinelliluce-outlet.it/pages/ITA/privacy.asp>.

This notice gives website Users information on:

- ✓ The types of data processed and the related legal basis for processing;
- ✓ The purposes and the manner in which data are processed;
- ✓ The mandatory or non-mandatory nature of data conferment;
- ✓ The consequences of not conferment;
- ✓ The data retention period;
- ✓ The third parties or categories of third parties to whom Personal Data may be disclosed or who may learn it in their capacity as data processors or persons in charge of the processing;
- ✓ The rights that Users may exercise.

TYPES OF DATA PROCESSED AND PURPOSE OF PROCESSING

The Website collects Personal Data automatically, as in the case of navigation data and data on the use of Cookies (See Cookies Notice at <http://www.martinelliluce.it/assets/PDF/COOKIE-POLICY.pdf>) or data may be freely conferred by Users.

Personal Data collected may be related to both User and third parties to whom User provides data.

The User assumes responsibility for the Personal Data of third parties published or shared through the Website and declares to have the right to disclose or disseminate it thus relieving Data Controller of all responsibility to third parties.

Data freely provided by User.

Sending e-mails to the addresses appearing on the Website

Any optional, explicit and voluntary sending of e-mails to the e-mail addresses appearing on the Website implies the subsequent acquisition of the sender's e-mail address necessary to reply to requests, and of any additional Personal Data provided. The legal basis for processing is the legitimate interest of Data Controller in establishing and maintaining effective commercial relationships with User.

Filling in the contact form

On page <http://www.martinelliluce.it/contatti/> of the website, Users will obtain updated information on what's new at Martinelli Luce in real time, by filling in a *form* where they will

disclose such Personal Data as (NAME AND SURNAME AND/OR BUSINESS NAME, OCCUPATION AND/OR BUSINESS ACTIVITY, NATION, PROVINCE, TOWN, ADDRESS, TELEPHONE NUMBER, E-MAIL, VAT REGISTRATION No., ZIP CODE, FAX No., WEBSITE). That data will be processed either manually or with the aid of computer systems, by the staff of MARTINELLI LUCE SPA, duly appointed, for the only purposes indicated above. Personal Data to be indicated on the *form* is broken down into two categories: mandatory and optional. Providing mandatory data and any processing thereof for the purposes indicated above are needed for the only purpose of providing User with updates from MARTINELLI LUCE SPA. Other data collected serves to help MARTINELLI LUCE SPA improve its services. The legal basis for processing is the consent of User. Data is retained for that purpose for 24 months, unless consent is withdrawn in the manners indicated below.

MODE AND PLACE OF PROCESSING

In processing the Data of Users, the Data Controller shall take appropriate security measures to prevent unauthorised access to, dissemination, modification or destruction of Personal Data. Data is processed with data processing and/or computer systems, in an organisational manner and with logics that are strictly connected with the stated purposes. In some cases, in addition to the Data Controller, Data might be accessed by categories of persons in charge of the processing, involved in the organisation and management of the Website (specifically appointed staff) or by parties outside the organisation (such as third party providers of technical services, postal couriers, hosting providers, IT service providers, communication agencies) also appointed, if necessary, as Data processors by the Data Controller. The updated list of Data processors can be requested to the Data Controller via email to: privacy@martinelliluce.it.

Data related to the web services provided through this Website is processed at the Data Controller headquarters (in 55100 Lucca, Via Teresa Bandettini) and is dealt with by staff specifically appointed for data processing.

OPTIONAL NATURE OF DATA PROVISION

User is free to provide his/her Personal Data on information request forms. Failure to provide any such data may make it impossible to satisfy requests.

WEBSITE SECURITY MEASURES

Specific security measures have been adopted to manage the Website, aimed at ensuring a safe access by user and protecting the information contained in the Website from any risk of loss or destruction, also by accident. An ID code and a password are assigned to those Users who so request, allowing them to access the reserved section of the Website; passwords thus created will not contain any reference that may easily be traced back to subscriber, to prevent any abuse. Users are required to keep their password confidential. Data provided is processed within the European Union. When Users' personal data needs to be transferred and/or stored outside the EU, User will be duly informed. Also in that case, all measures suited to ensure the maximum protection of information will be taken.

RIGHTS OF DATA SUBJECTS

Users may at all times exercise their rights by sending an e-mail to: privacy@martinelliluce.it
On certain conditions, Users may:

- request access to their Personal Data,
- obtain a copy of any Personal Data provided by them (so-called portability),
- request the rectification of data held by the Data Controller,
- request the deletion of data lacking in legal grounds for processing,
- object to the processing where permitted by applicable law,
- withhold their consent, where processing is based on consent;
- request restrictions on the manner in which the Data Controller processes their Personal Data, to any extent permitted by the Personal Data Protection legislation.

Exercising the above rights is subject to a number of exceptions aimed at protecting the public interest (for example prevention or detection of crimes) and our interests (for example keeping professional secrecy). Where Users exercise any one of the aforementioned rights, it shall be the responsibility of Data Controller to verify whether User may legitimately exercise them and feedback will normally be given within one month.

Regarding any complaints or reports on the manner in which User's data is processed, Data Controller shall endeavour to respond to any concerns raised. However, should Users so wish, they may address their complaints or reports to the Data Protection Authority, using the appropriate contact details: Garante per la protezione dei dati personali - Piazza di Monte Citorio, 121 - 00186 ROMA - Fax: (+39) 06.69677.3785 - Telephone: (+39) 06.696771 - E-mail: garante@gpdp.it - Certified e-mail address: protocollo@pec.gpdp.it