

**PRIVACY POLICY – CUSTOMERS**

**Information notice pursuant to Article 13 of the REGULATION (EU) 2016/679 (GDPR)**

**Processing of personal data collected from data subject**

Pursuant to Articles 13 and 14 of Regulation 2016/679/EU (hereinafter "GDPR"), we provide you with the necessary information regarding the processing of your personal data collected for the purpose of concluding the contract with the Customer and/or in the context of the execution and/or stipulation of the same, noting that if the activities provided to you involve the processing of personal data of third parties in your ownership, it will be your responsibility to ensure that you have fulfilled the provisions by the law with regard to the Data Subjects in order to make their processing by us legitimate.

**DATA CONTROLLER** – Azienda Agricola Monsereno Horses di Villa Massimo based in Imbersago (LC), Via Monsereno n. 9 - C.F. VLLMSM72P17M052U P. IVA 02239290139 –. The contact details of the Data Controller are:

telefono (+39)039 9921343, mail [servizi@monserenohorses.it](mailto:servizi@monserenohorses.it).

**PERSONAL DATA** - Any information relating to an identified or identifiable natural person ("data subject") and in particular: Tax code and other personal identification numbers, bank details, Contact and communication data, residential address, e-mail address, name and surname, name, address or other personal identification elements.

| PURPOSE OF THE PROCESSING  | LEGAL BASIS   | DATA RETENTION P   |
|--|---|--|
| a) Fulfilment of contractual obligations, execution and/or stipulation of the contract with the Client and/or management of any pre-contractual measures   | The processing is necessary for the execution of a contract to which the data subject is a party or for the execution of pre-contractual measures adopted at the request of the same - art. 6 b) -  | 10 years from the end of the contract or other legal obligation  |
| b) Fulfilment of any regulatory obligations, tax and tax provisions deriving from the performance of business activities and obligations related to administrative-accounting activities;  | The processing is necessary for compliance with a legal obligation to which the data controller is subject – art. 6 c) -  | 10 years from the end of the contract or other legal obligation  |
| c) Marketing: Sending, directly or through third party marketing and communication service providers, newsletters and communications for direct marketing purposes through email, sms, mms, push notifications, fax, paper mail, telephone.  | Consent of the data subject   | 10 years, without prejudice to the possibility for the interested party to modify and/or revoke his/her will |
| d) SOFTSPAM: commercial/promotional information activities, newsletters by e-mail to the e-mail address provided during the sale and/or information request, concerning the same type of product and/or similar service – art. 130, paragraph 4 of Legislative Decree 196/03 / legitimate interest (art. 6 lett. f) EU Reg. 2016/679), unless opposed. | Legitimate interest: Art. 6 lit. f) and recital 47: the processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, provided that the interests or fundamental rights and freedoms of the data subject are not overridden | Until you oppose it  |

**NATURE OF PROVISION AND REFUSAL –**

- The provision of data for purposes a) and b) is optional, but any failure to provide the Data and refusal to provide them would make it impossible for the Data Controller to execute and/or stipulate the contract and provide the services requested by it.
- The provision of data for purpose c) is based on the consent of the interested party. The provision of consent to the use of data for marketing purposes is optional and if the data subject wishes to object to the processing of Data for marketing purposes carried out by the means indicated herein or to revoke the consent given, he/she may do so at any time without

any consequence (except for the fact that he/she will no longer receive marketing communications) by following the instructions in the "Rights of the Data Subject" section of this Policy.

- Purpose d) Soft Spam: with regard to the activity of Soft Spam, the interested party has the right to object at any time to the processing of data. Objections, even after these e-mail communications, will not affect the contract.

**RECIPIENTS OR CATEGORIES OF RECIPIENTS OF DATA** - The data may be communicated to third parties appointed as data processors pursuant to Article 28 of the GDPR and in particular to banking institutions, companies active in the insurance field, suppliers of services strictly necessary for the performance of business activities, or to company consultants, if this is necessary for fiscal, administrative, contractual reasons or for needs protected by current regulations. Your personal data may also be communicated to external companies, identified from time to time, to which the Data Controller entrusts the execution of obligations deriving from the assignment received, to which only the data necessary for the activities requested of them will be transmitted. All employees, consultants, temporary workers and/or any other "natural person" who carry out their activities on the basis of the instructions received from Azienda Agricola Monsereno Horses di Villa Massimo, pursuant to Article 29 of the GDPR, are appointed as "Authorised to Process" (hereinafter also referred to as "Authorised"). Azienda Agricola Monsereno Horses di Villa Massimo gives adequate operating instructions to the Authorized Persons or to the Managers, if any, in order to guarantee the confidentiality and security of the data. With reference to the aspects of personal data protection, the Customer is invited, pursuant to art. 33 of the GDPR to report to Azienda Agricola Monsereno Horses di Villa Massimo any circumstances or events from which a potential "data breach" may arise in order to allow an immediate assessment and the adoption of any actions aimed at countering such event by sending a communication to Azienda Agricola Monsereno Horses di Villa Massimo to the contact details provided in this policy. The Data will not be disseminated. This is without prejudice to the obligation of Azienda Agricola Monsereno Horses di Villa Massimo to communicate the data to Public Authorities upon specific request.

**TRANSFER OF DATA TO A THIRD COUNTRY AND/OR AN INTERNATIONAL ORGANISATION AND SAFEGUARDS** - The personal data provided will not be transferred abroad to non-EU countries, nor to international organizations.

**DATA SUBJECTS' RIGHTS** - Data subjects have the right to obtain from the Data Controller, in the cases provided, access to personal data and the correction or cancellation of the same or the limitation of the processing that concerns them or to object to the processing (Articles 15 et seq. of EU Regulation 679/2016).

*You may object to processing based on legitimate interest (SOFT SPAM) at any time.*

To exercise your rights, you can contact the Data Controller at the email address [servizi@monserenohorses.it](mailto:servizi@monserenohorses.it). To stop receiving direct marketing communications (e-mails), simply send an e-mail to the address [servizi@monserenohorses.it](mailto:servizi@monserenohorses.it) with the subject "unsubscribe from mailing lists" or use our automatic unsubscribe systems provided for e-mails only. You have the right to revoke your consent at any time without prejudice to the lawfulness of processing based on consent before its withdrawal. Data subjects who believe that the processing of their personal data carried out in violation of the provisions of the Regulation have the right to lodge a complaint with the Guarantor for the protection of personal data – [www.garanteprivacy.it](http://www.garanteprivacy.it) -, as provided for by Article 77 of the Regulation itself, or to take legal action (Article 79 of the Regulation).

Update date: 16/10/2023

**Data Controller**  
**Monsereno Horses A.S.D.D.E.**

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## CONSENT

\_\_\_\_\_ I give my consent for purpose C) (Marketing: Promotional and commercial activities; Information to customers about new services/products; Sending of information and/or advertising material also by telephone or e-mail):  YES  NO

Data \_\_\_\_\_