

## **E-SHOP AND DOWNLOAD PAGE INFORMATIONS**

## PRIVACY NOTICE FOR NATURAL PERSONS UNDER ART. 13 OF REGULATION EU 679/2016

The Regulation EU 679/2016 provides for the protection of personal data concerning natural persons. In order to comply with the Regulation, our Company would like to inform you of the following:

**Purposes of the processing of data:** the purpose of the processing of any of your personal data is to allow the company of the data controller and its mandated collaborators and/or partners to carry out the following activities:

- Handling and execution of your request for registration to the site to enable eshopping and downloading of our technical-commercial material: consent is not required and the legal basis of data processing for this purpose is the fulfilment of the request (art.6.1 lett, b) GDPR).
- 2. **Protection of intellectual and industrial property rights on all our material:** since the Company reserves all and any intellectual and industrial property rights on all the available images, your data is linked to the downloaded material. Consent is not required and the legal basis for processing data for this purpose is the protection of our legitimate interest (art.6.1 lett, f) GDPR).
- 3. **Sending of material and newsletters for advertising purposes:** prior consent is required and the legal basis of data processing for this purpose is the consent itself (art.6.1 lett. a) GDPR).
- 4. **Internal statistics for aggregate data:** consent is not required and the legal basis for the processing of data for this purpose is the legitimate interest of the data controller (art.6.1 lett, f) GDPR).

In relation to the processing of your personal data marked with (\*) for the purposes referred to in points 1) and 2), the supply of your data is compulsory and refusal to provide it will make it impossible to fulfil your request. In relation, on the other hand, to the purposes referred to in points 3) and 4), the supply of your data is not compulsory and will not compromise the fulfilment of your request.

**Modes of data processing**: data are processed both on paper and by computer, in accordance with the security measures under Article 32 GDPR.

**Disclosure, extra-EEA data transfer and dissemination:** unless otherwise required by law or regulation or EU legislation, your personal data is not subject to dissemination of any kind or to transfer outside the European Union, without prejudice, in any event, to the compliance with all legal requirements. The subjects to whom your personal data may be disclosed are the following:

- professionals to whom the Controller may outsource certain activities (e.g., accountants, consultants) or producers of software and/or platform necessary to perform the contract.
- 2. financial institutions, in order to manage payments and receipts of sums resulting from the performance of the contracts;
- 3. professionals, in order to examine and resolve any legal matters relating to your position as a party to a contract (e.g., lawyers);
- 4. other persons as provided for by law.

**The controller of the processing is:** the company Starpool S.r.l., whose registered office is in via Stazione 25, 38030 Ziano di Fiemme (TN), Tel. +39 0462 571881 – e-mail: info@starpool.com.

The internal contact person for the processing of your personal data is: the Human Resources Manager, for the provisions set forth in the Regulation EU 679/2016, at our Company's registered office. Starpool has no obligation to designate a DPO pursuant to Article 37 GDPR.

**Data storage period:** data shall be stored for a maximum period of 10 (ten) years from the purchase you have made or the use you have made of the downloaded material for the purposes referred to in points 1) and 2); until you revoke your consent for the purposes referred to in point 3); for a maximum period of one year for the purposes referred to in point 4), exclusively to allow the aggregation of data. Your right to obtain, at any time, the cancellation or limitation of the use of the data is always maintained, unless this is in conflict with a specific legal obligation (art. 2220 of the Civil Code, art. 43 of Presidential Decree 600/73) or with our legitimate interest such as, for example, the protection of our intellectual and industrial property rights.

**Complaints**: you may lodge a complaint with a supervisory authority for the Privacy in the event that your data is processed unlawfully. **You may exercise your rights to access, erasure, rectification, restriction and objection** as provided for by Articles 16, 17, 18, 19 and 21 of the Regulation (EU) 679/2016, by writing to: the company Starpool S.r.l., whose registered office is in via Stazione 25, 38030 Ziano di Fiemme (TN), Tel. +39 0462 571881 – e-mail: <a href="info@starpool.com">info@starpool.com</a>