



**Information on the Processing of Personal Data, pursuant to Article 13, EU Regulation No. 2016/679 "GENERAL DATA PROTECTION REGULATION" (hereinafter "GDPR"), and Legislative Decree 196/2003 as amended by Legislative Decree 101/2018**

With this notice, we would like to inform you about how our Company, ROSORETTO S.S.A. (hereinafter Company or ROSORETTO), processes the personal data that you may provide us as our client (or as a representative, in any capacity, of one of our clients). This notice is published on the ROSORETTO.com website under the Privacy Policy section.

Unless otherwise specified, all legal references in this document refer to the GDPR.

**1. Data Controller**

The Data Controller is the company ROSORETTO S.S.A., with VAT number IT03340090046 and registered office at Via Alba Monforte 76, Castiglione Falletto (12060 - CN).

**2. Appointment of DPO – Data Protection Officer**

The Controller, not falling under the cases indicated in Article 37, nor under those indicated in the various interpretations of the Data Protection Authority, has deemed it unnecessary to appoint a Data Protection Officer.

**3. Subject of Processing**

We emphasize that the relevant regulation applies exclusively to personal data, meaning only data that can be traced back to NATURAL PERSONS (Article 2, paragraph 1 and Article 4, paragraph 1), and therefore does not apply to legal entities.

The processing concerns:

- Names, surnames, phone numbers, email addresses, roles, and positions within your company, which ROSORETTO personnel collect in the course of their duties, either during the pre-contractual phase or contract execution.
- Additional personal data, such as tax identification numbers, VAT numbers, residence and domicile addresses, and shipping addresses in the case of private clients who have purchased ROSORETTO products, for example, from our website.

We specify that ROSORETTO does not process data related to your credit card, as these are handled exclusively by the banking system's payment service, in full compliance with data security regulations.

**4. Purpose of Processing, Legal Basis, Nature of Provision**

- The personal data mentioned in sections 3.1 and 3.2 are acquired as part of the normal client/supplier relationship and are used by ROSORETTO exclusively for organizing sales activities. Providing these data is therefore mandatory; failure to do so may result in difficulties in executing the contract. This processing is lawful under Article 6, paragraph 1, letter b).



- Unless otherwise indicated by your Company, upon contract completion, these acquired data are retained by ROSORETTO for potential follow-up activities (feedback) or for direct marketing purposes. This processing is lawful under Article 6, paragraph 1, letter f).
- Accounting and tax-related data are retained for a longer period, as required by current legislation. This processing is lawful under Article 6, paragraph 1, letter c).

## 5. Processing Methods, Processing Duration

The personal data mentioned in sections 3.1 and 3.2 are collected directly from your Company or from you through direct communications: email, phone calls, messaging, or via the company website (based on Shopify) in case of online purchases. These data are stored in ROSORETTO's management software and are available in personnel agendas for common use (mainly email directories, company mobile phones).

If any data mentioned in section 3 are relevant for accounting, tax, or civil purposes, their retention will follow the period established by Italian law (typically 10 years).

## 6. Access to Data

Your data may be made accessible, solely for the purposes stated in section 4, to employees, collaborators, and partners of the Controller, in their capacity as authorized processors and/or system administrators, or to third-party companies or other entities performing outsourcing activities on behalf of the Controller, in their capacity as external data processors. ROSORETTO's policies include careful selection of internal and/or external entities that may access these data, based on expertise and full adherence to the security and confidentiality rules imposed by ROSORETTO.

## 7. Data Communication

Without requiring express consent (pursuant to Article 6, letters b) and c) of the GDPR), the Controller may communicate your data mentioned in section 3 to supervisory bodies, judicial authorities, as well as to those entities to whom communication is mandatory by law for the purposes specified in section 4 or for specific purposes required by requesting entities.

These entities will process the data as independent data controllers. Your data will not be disseminated.

## 8. Data Transfer

The personal data provided, as mentioned in section 3, are stored electronically and/or on paper on servers and/or in physical archives located at the Controller's premises within the European Union, and in the archives of the e-commerce service provider, Shopify, which is based in Canada. However, should it become necessary, the Controller may relocate archives and servers to other EU or even non-EU countries, such as in the case of cloud service usage. In such cases, the Controller ensures that any data transfer outside the EU will comply with applicable legal provisions, including the execution of standard contractual clauses established by the European Commission, and that the chosen cloud provider will guarantee an adequate level of security to ensure confidentiality, integrity, and availability of transferred data.

## 9. Data Subject Rights



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ROSORETTO guarantees your Company the exercise of the rights provided by law for data subjects and ensures cooperation in responding to specific requests from data subjects. However, ROSORETTO does not guarantee (unless otherwise agreed with your Company) the direct exercise of these rights by data subjects. In case of such requests, ROSORETTO will only forward the data subject's request to your Company.

Data subjects have the rights provided in Articles 15, 16, 17, 18, 19, 20, 21, and 22 of the GDPR, including:

- Right of access
- Right to rectification
- Right to erasure ("right to be forgotten")
- Right to restriction of processing
- Right to notification obligation regarding rectification or erasure of personal data or restriction of processing
- Right to data portability
- Right to object
- Rights related to automated decision-making, including profiling

#### 10. Methods of Exercising Data Subject Rights

Any data subject may exercise their rights at any time by sending:

- A registered letter with return receipt to the Data Controller at the address indicated in section 1
- An email to [info@rosoretto.com](mailto:info@rosoretto.com)

*ROSORETTO S.S.A.*