

“Privacy policy”

Pursuant to art. 13 of the Regulation (EU) 2016/679 of the European Parliament and of the Council – *General Data Protection Regulation (GDPR)*

K di Kuore protects your personal data and commits to guarantee the security and confidentiality.

With this note (“*privacy policy*”) if you want to receive our communications, we would like to explain why we need you to give us some information, how we are going to use it and which are your rights.

We would like to be able to inform you about our projects, about the new collections, the organization and the participation of K di Kuore in the sectoral trade fairs and events.

In order to do it, we need your consent.

We keep track of the registration information of the Newsletter (time and IP address) and each modification of the personal information provided to us.

The data is kept in the *server* of the company, in Florence (Italy).

Please read carefully this policy.

For any further clarification or question, please contact us privacy@kdi kuore.com

DATA CONTROLLER

The personal data controller is K di Kuore S.r.l., Viale Donato Giannotti, 24 (50126 FLORENCE)
Contacts: telephone: +39 055 6800377, e-mail: privacy@kdi kuore.com

SUBJECTS AUTHORIZED TO THE DATA PROCESSING

The processing of personal data may be carried out by the persons authorized by the controller, under the instructions that were provided to them and under the measures of protection of the implemented personal data, for which they have received an adequate training.

PURPOSE OF THE DATA PROCESSING

The purpose of the personal data processing is to carry out *Marketing* activities directed by the data controller, by sending direct commercial or promotional communications, with automated contact ways (email), regarding projects, new collections, organization or participation to events or sectoral trade fairs.

LAWFUL BASIS FOR DATA PROCESSING

The consent of the interested party.

DURATION OF THE DATA PROCESSING AND PERIOD OF DATA RETENTION

The data processing will be carried out until the revocation of consent.

You can revoke the consent to the mailing of our communications in any moment, by using the *link* “revoke the consent-*unsubscribe*” present in every e-mail that we will send you.

Afterwards, the data will be kept for as long as the law requires.

In the event of any dispute, until its settlement and at the end of the related executive actions and, anyhow, for as long as the law requires its preservation.

Once the periods of preservation have expired, the personal data will be removed, deleted or rendered anonymous, in accordance with the technical procedures of deletion and *back-up*.

METHOD OF PROCESSING DATA

The processing of personal data is carried out through digital tools (informatics, telematics, etc.) and analogical ones, with organizational and operative methods which are functional to the enforcement of the indicated purposes, by respecting the security measures which are suitable to prevent the access, the diffusion, the modification or their unauthorized destruction, so that an adequate level of protection is guaranteed.

AUTOMATED DECISION-MAKING AND PROFILING

We do not assume any decision solely based on the automated processing, including the profiling, that would produce legal effects that concern or affect significantly the interested party.

OBLIGATION TO SUPPLY DATA

To supply the indicated personal data is optional.

The failure to notify this data does not allow to provide the services or to carry out the activities for which they were requested.

DATA RECIPIENTS (OR THEIR CATEGORIES)

The personal data processing may be carried out by external subjects, acting as **independent data controllers**, such as for example, public administrations, judicial authorities, surveillance and control authorities, legitimated to obtain the data processing according to the current legislation, or, natural or juridical persons, that carry out activities of consultancy, assistance or advocacy on behalf of the controller, as provided by a contract.

The processing of personal data may also be carried out, on behalf of the controller, by external subjects that are designated **processors** by the controller, in compliance with the instructions provided to them and with the measures of protection of the implemented personal data, for which they have received an adequate training.

In order to send the communications, K di Kuore uses the MailChimp *marketing automation platform*, managed by The Rocket Science Group LLC, that was designated as the data processor by signing a specific assignment contract ("*MailChimp Data Processing Addendum*").

Data processor: The Rocket Science Group LLC, 675 Ponce De Leon Ave Ne, Suite 5000, Atlanta, Georgia (USA -30308).

Contact information: telephone +404 806 5843, e-mail: legal@mailchimp.com

In any case, the personal data will be communicated when requested by the law, or if it is requested by the police, judiciary authority, information and security institutions or by other public bodies, for the defence and security of the State, or for reasons of prevention, investigations or prosecution of offences.

The collected personal data will not be subject to spread.

DATA PROCESSING SITE

Personal Data is processed in the data controller's headquarters and in any other place where the interested parties are based.

The management and the preservation of the personal data takes place on *servers* located in the European Union.

TRANSFER OF DATA TO THIRD COUNTRIES OR TO AN INTERNATIONAL ORGANIZATION

Using the *marketing platform* MailChimp, your personal data is transferred to third countries (*outside* the EU).

The Rocket Science Group LLC (Mail Chimp) is an *EU-U.S. Privacy Shield Framework* certified company.

The participation to the *Privacy Shield* allows to guarantee the lawfulness of the transfer of the personal data in the United States and that their processing will be carried out in a legal framework compatible with the EU General Data Protection Regulation.

The Rocket Science Group LLC exclusively carries out the processing of the personal data for which it was appointed, in compliance with the instructions provided by the data controller and its Privacy Policy.

Visit the Privacy Policy of the MailChimp service in this link: <https://mailchimp.com/legal/privacy/>

In any case, MailChimp will not cede or communicate to third parties your personal data, nor will diffuse them in any other way and will not use them to contact you directly or through others.

SURVEYS AND STATISTICAL ANALYSIS

The emails that we will send you may have *web beacons*, some *files* that allow MailChimp to register some technical information (for example, the *Internet browser* or the operating system that you use, the IP address and the viewing time of the message) that allow us to know if the emails were opened, when and which *links* were consulted.

This information is anonymous and enables K di Kuore to improve the contents and to send you emails with more and more interesting contents which can be attributed to a specific recipient only in case of technical necessities.

MAILCHIMP.COM WEBSITE

Consulting the emails that we will send you, you may be redirected to the Internet site mailchimp.com, for example when you modify your registration data or you consult the Privacy Policy of the MailChimp service.

The mailchimp.com website uses navigation *cookies*.

For more information consult the *Cookie Settings* section of mailchimp.com website

RIGHTS OF THE INTERESTED PARTY AND PROTECTIONS

The interested parties have the right to request to the data controller the right of **access** (art. 15 of the regulation), the right of **rectification** (art. 16), the right to **cancellation** (art. 17) of the personal data, as well as the right to **restriction** (art. 18) or the right to **object to their processing** (art. 21).

If the data processing is based on the consent or on a contract and the data processing is carried out with automated means, the interested parties have **the right to data portability** (art. 20) of their

personal data and, for that purpose, to receive from the data controller that data in a format that makes their transfer and subsequent processing suitable for another data controller.

If the processing of personal data is based on the consent, the interested parties have the right to **revoke the consent in any moment**, without undermining the lawfulness of the control based on the consent provided before the revocation.

Having revoked the consent, the joint data controllers will abstain from the control of such personal data, except for legitimate reasons that prevail on interests, rights and freedom of the interested parties, or for investigation, exercise or defence of a right in a Court of law.

The above-mentioned rights may be exercised via *e-mail* to privacy@kdi kuore.com

In the event that the interested parties deem that the processing of the personal data that concerns them is in breach of the regulation, they have the right to **lodge a complaint with the control authority** in the State of the European Union where they usually live, work or in the place where the supposed breach took place (art. 77), or to take the matter to the competent Courts (art. 79).

In the event that the interested parties deem that the processing of personal data that concerns them does not comply with the current provisions, or if the answer to a motion in which it was exercised one or more of the rights established by articles 15-22 of the regulation did not arrive within the timeframe set forth or it is not satisfactory, they can **take the matter to the judiciary authority** (art. 79) or lodge **a complaint to the Personal Data Protection Supervisor** (art. 77), using the form in the website (<https://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/4535524&zx=8g4flgcaf421>) following the instructions set out therein.

Florence, 24 May 2018

K di Kuore S.r.l.

The pro-tempore legal representative