

## PROCESSING OF PERSONAL DATA INFORMATION IN THE CONTEXT OF CUSTOMER CARE SERVICE

Pursuant to art. 13 of Regulation (EU) 2016/679 - General Data Protection Regulation ("GDPR") and of Legislative Decree n° 196/2003 as amended by Legislative Decree n° 101/2018, **AGRICOLA TRE VALLI SOCIETA' COOPERATIVA** (VAT: 01631760236), with registered office at via Valpantena 18/g, 37142 - Quinto di Valpantena (VR), in person of the legal representative, owner of the data processing ("Data Controller"), hereby informs how personal data of the customers is processed (hereby included: name, surname, address, telephone number and email address) through the customer care service ("Data").

The Data will be processed in compliance with the provisions contained in the GDPR, within national and European community legislation regarding the protection of personal data and the related provisions issued by the competent authorities as well as the principles of correctness, lawfulness, transparency, protection of confidentiality and related rights. In particular:

**1. IDENTITY AND CONTACT DETAIL OF THE DATA CONTROLLER: AGRICOLA TRE VALLI SOCIETA' COOPERATIVA** (VAT: 01631760236), with registered office at via Valpantena 18/g, 37142 - Quinto di Valpantena (VR), contactable at the following e-mail address: [privacy.agricolatrevalli@agricolatrevalli.it](mailto:privacy.agricolatrevalli@agricolatrevalli.it)

**2. DATA PROCESSED, PURPOSE AND LEGAL BASIS FOR PROCESSING:** The Data may be processed for the following purposes:

- a) fulfilment of pre-contractual commitments or the execution of the contract [for example: request for information, management of reports and/or complaints), falling within the legal basis provided for by art. 6, § 1, lett. b) GDPR;
- b) fulfilment of legal obligations by the Data Controller imposed by sector (administrative, accounting, etc.), national and European legislation, applicable to the existing relationship and/or connected activities to and/or instrumental activities, falling within the legal basis provided for by art. 6, § 1, lett. c) GDPR;
- c) legitimate interest of the Data Controller to maintain the historical list of data relating to reports and/or complaints received for purposes related to the management of production and quality processes as well as to prevent any fraud, falling within the legal basis provided for by art. 6, § 1, lett. f) GDPR;

- d) legitimate interest of the Data Controller related to the ascertainment, exercise or defence of a right in all competent courts, including out-of-court procedures, falling within the legal basis provided for by art. 6, §1, lett. f) GDPR.
- e) sharing of data among companies that are part of the “Veronesi Group” for the purpose of internal administration and management of production and quality processes, within the legal basis provided for by art. 6, § 1, lett. f) GDPR.

Furthermore, it should be noted that in the event that the interested party spontaneously transmits and/or requested by the Data Controller, personal data falling within the special categories pursuant to art. 9 GDPR (these are personal data suitable for revealing: *“racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as genetic data, biometric data intended to uniquely identify a physical person, data relating to the health or sexual life or sexual orientation of the person”*), the processing of such data by the Data Controller will have the consent pursuant to art. 6, § 1, lett. a), and 7 GDPR.

Furthermore, the Data Controller reserves the right to take into consideration only those Data necessary for the management of the customer care practice.

Finally, it should be noted that in order to better manage your procedure, where necessary, additional personal data may be requested by the Data Controller, which will be processed in compliance with the privacy legislation and the indications contained in the present data protection information.

**3. PROCESSING METHOD:** the processing of Data is carried out by means of the operations of collection, registration, organisation, storage, consultation, processing, modification, comparison, use, interconnection, selection, extraction, blocking, communication, cancellation and destruction of Data.

The Data are processed using electronic or automated instruments, IT, telematics and/or paper tools and in any case with methods strictly necessary to meet the aforementioned purposes.

The Data may be collected by the Data Controller, through its postal addresses and telephone numbers, as well as through third subjects appointed as “Data Processor” pursuant art. 28 GDPR, who collected the report and/or the complaint presented by the interested party. The Data is recorded and stored by the Data Controller in digital supports and/or paper archives, as well as kept and controlled in a manner suitable for guaranteeing their protection and confidentiality, in compliance with the aforementioned legislation in force pursuant to personal data protection.

The processing takes place through employees and collaborators of the Data Controller, expressly identified and authorised for the processing (pursuant to Article 29 of the GDPR) as well as by subjects external to the organisation company of the Data Controller, appointed for this purpose, where appropriate, as data processors (pursuant to art. 28 GDPR).

The Data is not subject to disclosure, nor to any fully automated decision-making process, including profiling.

**4. NATURE OF DATA PROVISION:** the provision of data for the purposes indicated in point 2 above is mandatory. Failure to provide Data, even partially, implies the impossibility for the Data Controller of establishing and/or continuing the relationship with the Customer.

**5. RECIPIENTS OR POSSIBLE CATEGORIES OF DATA RECIPIENTS:** The Data may be communicated, within the limits strictly relevant to the obligations, tasks and purposes referred to above and in compliance with current legislation on the subject, to the following categories of subjects:

- a) external natural and/or legal persons authorised to elaborate the processing indicated in point 3 above (e.g.: call centres, suppliers, consultants, authorities, professional firms, insurance companies, etc.);
- b) other subsidiaries and/or affiliates of the Data Controller that are part of the “Veronesi Group”;
- c) subjects to whom such communication must be made in order to fulfil or demand the fulfilment of specific obligations by law, regulations and/or national and EU legislation.

**6. TRANSFER OF DATA TO A THIRD COUNTRY OR INTERNATIONAL ORGANISATIONS:** as part of the management of the relationship with the Data Controller, the Data shall be processed within the EU.

**7. DATA STORAGE:** for the purposes indicated in point 2, the Data will be processed by the Data Controller for the entire duration relating to the management of the customer care practice.

Subsequently, only the Data required by current accounting, tax, civil and procedural legislation will be stored for the time provided therein.

**8. RIGHTS OF THE INTERESTED PARTY AND METHOD OF EXERCISE:** in relation to the processing described in this information, as an interested party, you have the right:

- to have access, rectification, cancellation, limitation and opposition to the processing of data;
- to receive the Data in a structured format, commonly used and readable by an automatic device to transmit them to another data controller;
- in relation to the Data falling within the special categories pursuant to art. 9 GDPR, to revoke consent to the processing of data possibly given, without prejudice to the lawfulness of the processing based on the consent acquired before the revocation;
- propose a complaint to the Guarantor Authority for the Protection of Personal Data.

# ***Agricola Tre Valli***

To exercise all the rights identified above, please contact the Data Controller at the address indicated in point 1 above.

**AGRICOLA TRE VALLI SOCIETA' COOPERATIVA**