



PRIVACY STATEMENT IN ACCORDANCE WITH ART. 13 OF EU REGULATION 2016/679

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This statement is given in accordance with art. 13 of EU Regulation 2016/679 (hereinafter, also just “**Regulation**” or “**GDPR**”):

1. Data Controller

The Controller is FATTORIA LA LECCIA SOCIETÀ AGRICOLA a r.l. (hereinafter also just “**Fattoria La Leccia**”), via Lorenzo il Magnifico n. 14, 50129 Firenze (FI), e-mail: privacy@laleccia.it.

2. Type of personal data processed

Fattoria La Leccia collects and processes personal data relevant to the User and, specifically, identification and contact data such as name, surname, e-mail (hereinafter jointly defined as “**Personal Data**” or just “**Data**”).

3. Purpose and methods of data processing

The Personal Data required when filling out the “*Contacts*” form on the website hereinafter also just “**Site**”) are collected and processed for the following purposes:

- A)** to contact back the User and reply to the messages received;
- B)** to carry out general assistance to the User (Customer Care) by responding to information's requests, to sending communications, assistance requests and responding to and handling complaints or any returns from the User;



C) to handle any out-of-court disputes (e.g. by means of alternative dispute resolution procedures also through EU platforms for the online disputes resolution), in judicial and/or administrative courts, or in the European Small Claims procedure;

D) with User's express consent, for direct marketing purposes and, specifically:

- a) to send information and promotional material regarding goods and services and future promo-advertising activities by the Controller, also via post, e-mail and sms;
- b) to send commercial communications and information, promotional and advertising material (e.g. brochures, catalogues, samples, e-mail, etc.), material relevant to marketing campaigns and events, carry out market research through questionnaires, also via post, e-mail and sms containing information relevant to products, events or promotions;
- c) anonymously and/or pseudonymised, to carry out market research and statistical analysis on the methods and/or propensities to consume with the possible creation of profiles which refer to anonymous consumer groups defined by common characteristics (age groups, geographical area of residence, etc.);
- d) to contact back the User and keep him updated regarding Fattoria La Leccia's new initiatives by sending communications, special offers and promotional material or similar initiatives via post, e-mail and sms.

Personal Data will be processed by the Controller, Processors and third parties authorised to process the Data ("**Authorized**" or "**Appointees**"), in compliance with all of the measures appropriate to guarantee security and confidentiality, using paper and with the aid of IT instruments (including management and use of database marketing), pursuant to principles of law, protecting the data subject's confidentiality and his/her rights, by adopting appropriate technical and organisational measures to guarantee an adequate level of security for the risk.

Specific and appropriate technical and physical security measures will also be adopted to avoid the risks of loss, destruction and unauthorised access to data.

4. Legal basis for processing

The legal basis of the processing for the purposes set out in point 3 are:

lett. A) and lett. D) is freely expressed consent pursuant to Article 6, par. 1, lett. a), of the Regulation;

lett. B) is the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract in accordance with Article 6 par. 1 lett. b) of the Regulation;

lett. C) is the purposes of the legitimate interests pursued by the Controller or by a third party in accordance with Article 6, par. 1 lett. f) of the Regulation.



5. Recipients/Categories of recipients of the personal data

User's Personal Data can be communicated exclusively for the above purposes, to the following categories of recipients:

- companies, consultants or professionals in charge of the design and implementation of websites and technological solutions as well as, in general, of the management of Fattoria La Leccia's hardware and software systems and the suppliers of cloud computing services, including third parties that the above mentioned subjects may use;
- companies in charge of sending commercial communications both by e-mail and by post, or public or private entities that manage the service of delivery of ordinary and commercial correspondence, including third parties that may be used by the aforementioned parties;
- companies that carry out activities of packaging and/or shipping and delivery or collection of the products purchased on the Site and third parties that they may make use of;
- persons, companies, associations or professional firms that provide services and activities of assistance and consultancy to the Controller, with particular but not exclusive reference to accounting, administrative, legal, tax and financial matters, who need to access the Data for purposes that are auxiliary to the request sent through this form and relevant activities, within the limits strictly necessary for the performance of its duties;
- associate companies, companies belonging to the same Corporate Group as Fattoria La Leccia belongs;
- parties whose right to access your Data is recognised by provisions of the law and secondary legislation;
- other parties may gain knowledge of your Personal Data, such as Fattoria La Leccia employees who are assigned tasks necessary to process and manage the requests received through this form.

These parties act as Authorized, Controllers or Processors in accordance with Article 28 of the EU Regulation, parties that Fattoria La Leccia uses to carry out its activities and which offer suitable guarantees of compliance with the regulations on the processing of personal data.

Any transfer of the Data to countries outside the EU, due for example to specific needs related to the location of the services provided by the suppliers, will be made based on an adequacy decision of the European Commission or, in the case of transfers referred to in Articles 46, 47 or 49 of the European Regulation, based on the conditions set out therein and of appropriate guarantees, including, where applicable, standard contractual clauses.



Your Personal Data will not be disclosed in any way.

6. Collection of data and consequences should they not be provided

The provision of Personal Data in the “*Contacts*” form of the Site for the purposes set out in point 3 is optional.

The same is, however, necessary to achieve the purposes set out in point 3, letters A) and B) and any failure to provide it will have no other consequence than the impossibility of replying to messages received and carrying out general activities of assistance to the User (Customer Care) such as, for example, replying to messages sent responding to requests for information, sending communications, requests for assistance, and responding to and handling complaints or returns.

Any refusal to give consent to the processing of Data for the purposes set out in point 3, lett. D) will have no consequence for the purposes of processing the request for contact and/or assistance to the User, but will not allow the User to receive direct marketing communications from the Controller.

7. Revocation of consent

The User has the right to withdraw the consent previously given for the purposes set out in point 3 lett. A) and D) at any time, without affecting the lawfulness of the processing carried out based on the consent given before its withdrawal.

In order to withdraw your consent for the processing, it will be sufficient to send your request for revocation of consent to the Controller by registered letter or e-mail at the addresses and contact details indicated in point 1 of this privacy statement.

8. Data retention period

The Data in question will be retained for the period strictly necessary to achieve the purposes indicated in point 3 and, therefore: (i) for the time necessary to provide the information requested by the User with reference to the purpose referred to in lett. A); (ii) for the time necessary to respond to information’s requests, to send communications and requests for assistance from the User or to respond and handle complaints or any returns with reference to the purpose referred to under point 3 lett. B); (iii) for 10 years from the delivery of the product or from the end of the contract or from the closure of the file relating to the exercise of the rights provided for by law and/or the contract, with reference to the purposes referred to in lett. C); (iv) for the maximum storage period of 24 months for the purposes referred to under point 3 lett. D).

In any case, without prejudice to the earlier revocation of consent with reference to the purposes referred to in point 3 lett. A) and D) in which case Fattoria La Leccia will proceed without delay to the cancellation of Personal Data.



9. Data subject's rights

At any time, the User can exercise his/her rights towards the Controller in accordance with Articles 15 et seq. of the Regulations that we reproduce here below for your convenience:

- **Right of access and rectification** (Arts. 15 and 16 of the Regulation): the User has the right to obtain confirmation that his/her Personal Data is being processed and, in this case, to obtain access to them. The User also has the right to request the rectification of inaccurate Personal Data that concerns him/her and to obtain the completion of incomplete Data. If User wish, we will provide him/her with a copy of his/her Data in our possession.
- **Right to erasure of the data** (Art. 17 of the Regulation): in the cases envisaged by current legislation (e.g. the personal data is no longer necessary for the purposes for which they were collected or otherwise processed, revocation of consent, unlawful processing, etc.), the User can request the erasure of his/her Personal Data, which Fattoria La Leccia will carry out without delay.
- **Right to the restriction of processing** (Art. 18 of the Regulation): in the cases provided for by current legislation (inaccuracy of personal data, unlawful processing of data, etc.) the User has the right to obtain the restriction of the processing of his/her Personal Data.
- **Right to data portability** (Art. 20 of the Regulation): the User has the right to receive his/her Data in a structured, commonly used and machine-readable format, in order to send the same to another Controller, where the same is required and technically possible, or we will provide to send your Data directly to the other Controller.
- **Right to object** (Art. 21 of the Regulation): the User has the right to object at any time, for reasons connected to his/her particular situation, to the processing of the Personal Data that concerns him/her in accordance with Art. 6, paragraph 1, letter e) or f) of the Regulation, including profiling based on such provisions (legitimate interest of the Controller).

To exercise these rights it will be sufficient to contact the Controller by registered letter or e-mail at the addresses indicated in point 1, also using the forms made available on Data Protection Supervisory Authority's Website (www.garanteprivacy.it).

Upon receipt of your request, Fattoria La Leccia has one month to take all the necessary actions. Within this deadline, despite the exercise of the rights, the User may receive further automated communications whose sending was planned prior to his/her request.

The deadline of a month can be extended to two months in the event of a complex or numerous requests.



10. Complaint to the Data Protection Supervisory Authority

Should the User believe that there has been a breach of his/her right to the protection of the Personal Data, it is his/her right to lodge a complaint with the Supervisory Authority for the Protection of Personal Data using the methods and in compliance with the terms on the website of the Data Protection Supervisory Authority (<http://www.garanteprivacy.it>).

11. Minors' personal data

The services of this Site are aimed at the general public and are not intended for minors under the age of 18. We do not knowingly collect Personal Data from Users under this age group.

By entering his/her Data in the "*Contacts*" form, the User declares that he/she is 18 of age or older.

Should the Personal Data belonging to a minor under the age of 18 be released, the Controller will immediately cancel the same.