

Santorelli GDPR Policy

The General Data Protection Regulation (GDPR) 2016/679 of the European Union sets new standards in the protection of Personal Data.

Santorelli is committed to be compliant with the GDPR and the following Privacy Policy outlines our commitment to protect your Personal Data.

The principles inspire us

We apply the following principles:

- **Lawfulness, Fairness and Transparency:** personal data are processed lawfully, fairly and in a transparent manner in relation to the data subject.
- **Purpose limitation:** personal data are collected for specific, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- **Data minimization:** personal data are appropriate and limited to what is necessary in relation to the purposes for which they are processed.
- **Accuracy:** personal data are accurate and, where necessary, kept up to date.
- **Storage limitation:** personal data are kept in a form which allow identification of data subject for no longer than is necessary, for the purpose for which are processed.
- **Integrity and confidentiality:** personal data are processed in a manner that ensure appropriate security

What information we collect

We collect the information given to us also during the navigation on our websites, when creating an internet account or participating to our initiatives.

The information we collect constitutes your "personal data" (e.g. name, date of birth, location) as defined by the General Data Protection Regulation.

According to the General Data Protection Regulation (GDPR), "Personal Data" means any information relating to an identified or identifiable natural person.

We process your personal data in compliance with the GDPR and any data protection provisions adopted by the European Union Member States.

When we process your personal data

When we conduct contests or promotions, we usually ask you to join after being registered. We will use the information provided only for the purposes of carrying out the contest or promotion. We will retain your personal information for the duration of the contest or promotion and subsequently deleted unless you consented us to further process them.

Sometimes we may conduct surveys about the preferences and interests of our customers. If the surveys do not require you to identify yourself, no personal data will be collected. Otherwise, we will only use the information you provide to conduct the survey.

How we use your Personal Data

We will process your personal data to offer you the best browsing experience, in accordance with the law.

We provide all the information about: how we use your personal data, for what purposes, how we store it and who to contact to exercise your rights.

We only keep your personal information for as long as is strictly necessary for the purpose or in accordance with the law. We protect all of your personal information by adopting and implementing technical and organizational measures to ensure a level of security commensurate with the risk of the processing activities.

Sharing of Personal Data

Occasionally, your personal data could be shared with other companies of Santorelli Group in compliance the GDPR and the relevant provisions of law. We could share your personal data with third companies to provide their services or to respect relevant disciplines.

How do we protect your personal data

We guarantee that your personal data is always accurate and up-to-date. Santorelli takes all measures required by law and best practices for data protection. We take the security of your personal data very seriously. We use state-of-the-art security technologies that are constantly being tested and updated. We apply secure data storage methods in secure locations and have organizational and administrative procedures for direct control by authorized operators. We understand that despite our best efforts, no system can be completely reliable. For this reason, we retain personal data only for the purposes for which it was obtained and only for the minimum period necessary, unless a longer period is required as permitted by law. In the event of a data security breach that may affect your rights, in accordance with the provisions of the GDPR, we will inform you immediately as required by the new General Data Protection Regulation.

Children's privacy

Santorelli offers services designed primarily for adults. However, if we decide to offer the Service to children, appropriate security measures will be taken and specific consent may be required from the children's parents. If a child has registered on our Sites or Services, we allow parents (or guardians, where applicable) to access, modify or delete the child's personal information. For this purpose, parents/guardians can follow the same procedure available to any user by logging into the child's profile, or they can contact our customer service department.

Privacy rights and contact

You have access to your personal data, just ask us.

You have the right:

- You have the right to check whether your personal data is being processed.
- Access to your personal data and obtain information about:
 - the purposes of the processing;
 - the categories of your personal data;
 - the recipients with whom Santorelli shares them;

- the length of the storage period of your personal data;
- the right to file a complaint with the supervisory authority;
- to request correction, deletion, restriction of processing and portability of your personal data;
- to object to the processing of your personal data.

Our Data Protection Officer can receive any further inquiry at the following email address at:

gdpr@santorelli.eu