












# PRIVACY POLICY - CUSTOMERS





Information notice pursuant to Art. 13 of EU Regulation 2016/679 ("GDPR") and art. 130 of national Privacy Code


	<b>1.WHO IS THE DATA CONTROLLER? HOW CAN I CONTACT HIM?</b> The Data Controller is <b>BOFFI S.P.A.</b> with registered office in Oberdan n. 70, 20823 – Lentate Sul Seveso (MB), in person of its legal representative whom you can reach out to for any requirements writing to: e-mail <a href="mailto:privacy@boffi.com">privacy@boffi.com</a>
	<b>HAS THE DATA PROTECTION OFFICER BEEN APPOINTED? HOW CAN I CONTACT HIM?</b> The Data Controller has appointed its Data Protection Officer (DPO) in accordance with Articles 37, 38, and 39 of the GDPR. The DPO can be reached out at the registered office mentioned above and via email writing to: <a href="mailto:dpo.boffi@dpoprofessionalservice.it">dpo.boffi@dpoprofessionalservice.it</a>
	<b>2.MAIN DEFINITIONS</b> We remind you art. 4 GDPR sets the following definitions out: <b>Personal data:</b> any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can directly or indirectly be identified, in particular by reference to an identifier such as a name, an identification number, a location data, an online identifier or to one or more specific factors to the physical, physiological, genetic, mental, economic, cultural or social identity. <b>Contractor/User Data.</b> - "contractor", any natural person, legal person, body or association being part of a contract with a provider of electronic communications services accessible to the public for the provision of such services, or in any case recipient of such services via prepaid cards; - «user», any natural person employing an electronic communications service accessible to the public, for private or commercial reasons, with no necessary and prior subscription.

## 3. PURPOSE OF PROCESSING, LEGAL GROUND, DATA RETENTION, NATURE OF CONFERRAL

			
PURPOSE OF PROCESSING	LEGAL GROUND	DATA RETENTION	NATURE OF CONFERRAL
<b>A)</b> <b>Management of data subjects' requests, pursuant to art. 15 and following GDPR (data subjects' rights)</b>	The processing is necessary to comply with a legal obligation the data controller is liable to (C45) Art. 6 par. 1 lett. c) GDPR	5 years after closure, except from lawsuits	Data conferral is mandatory, being indispensable to grant the fulfilment of any legal obligations
<b>B)</b> <b>Direct marketing:</b> The data controller will use, for the purpose of direct sale material, for sending advertising, for carrying out market and satisfaction research, for promotional and commercial communications and newsletters by automated means (e-mail or through social networks and sponsorships) and traditional means (telephone calls through operator and paper mail, also through data processors) of products of the BOFFI, DE PADOVA, ADIELLE brands. For a complete list ask <a href="mailto:privacy@boffi.com">privacy@boffi.com</a> . <i>In order to compare and possibly improve the results of automated communications, the Data Controller does make use of</i>	The processing is based on Data subject's consent (C42, C43) Art. 6 par. 1 lett. a) GDPR	Until the withdrawal of the consent (opt – out).	Optional: in case of denial the data controller won't be able to send you promotional communication / direct marketing

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<p>reports. Thanks to these latter, the controller will be able to discover: the number of readers, of openings and unique "clickers"; the device and the operating systems requesting contents; details on the activity of individual users; the detail of sent, delivered or forwarded E-Mails. These reports are used for the purpose of comparing, and possibly improving, the results of communication.</p>			

	<p><b>4. DATA RECIPIENTS</b></p> <p>Personal data will not be disseminated. All the personal data may be disclosed to recipients acting as autonomous Data controllers or Data Processors (art. 28 GDPR) and processed by persons appointed to, pursuant to art. 29 GDPR and acting under the authority of the controller or the processor, upon written letter of authorizations relating to purposes and means of processing. Personal data may be disclosed to recipients belonging to the following categories:</p> <ul style="list-style-type: none"> <li>• group companies;</li> <li>• Subjects providing services for the management of the information system and telecommunications networks (including E-Mails services, websites, platforms and Cloud) the data controller does employ (occasionally or not);</li> <li>• Public bodies to whom send mandatory communications pursuant to any accounting/tax legislation</li> <li>• Subjects the Data Controller has entered into economic agreements with;</li> <li>• Firms or Companies in the context of assistance and consultancy;</li> <li>• Subjects providing Audits and ISO or other certifications</li> <li>• Entities and members of the Supervisory Body pursuant to Legislative Decree 231/2001</li> <li>• For direct marketing to individuals for the management of marketing activities and communications;</li> <li>• Competent authorities fulfilling legal obligations, upon request.</li> </ul> <p>The complete listing of Data Processors pursuant to art. 28 is available writing to <a href="mailto:privacy@boffi.com">privacy@boffi.com</a> or contacting any of the aforesaid contact details.</p>
	<p><b>5. INTERNATIONAL DATA TRANSFERS</b></p> <p>Personal data will not be transferred to third countries outside the EEA.</p> <p>For the purposes of this privacy notice, the Controller is located in Italy so the personal data will be transferred from a country outside the EEA (Singapore) towards an EEA country (Italy) and will be stored in Italy.</p> <p>The transfer is governed by Standard Contractual Clauses (SCC) of the European Commission (Article 46(2)(c) and (d) GDPR). For more information relating to the data transfer you can contact us at <a href="mailto:privacy@boffi.com">privacy@boffi.com</a></p>
	<p><b>6. AUTOMATED-MEAN PROCESSING</b></p> <p>Personal data will be subjected to traditional and manual, electronic or automated processing. Fully automated decision-making processes are not carried out.</p>
	<p><b>7. DATA SUBJECTS' RIGHTS</b></p> <p>Data subjects may assert their rights as expressed in Articles 15 GDPR and following contacting the DPO/RPD at the email address: <a href="mailto:dpo.boffi@dpoprofessionalservice.it">dpo.boffi@dpoprofessionalservice.it</a> or reaching out the Data Controller at: <a href="mailto:privacy@boffi.com">privacy@boffi.com</a> or writing to the contact details provided above. The Data Controller ensures data subjects the possibility to request, at any time, access to their personal data (Article 15), rectification (Article 16), erasure of the same (Article 17), and restriction of processing (Article 18). The Data Controller communicates (Article 19) any rectifications, erasures, or restrictions of processing to each recipient to whom the personal data has been disclosed. The Data Controller informs the data subjects upon their request about such recipients.</p> <p>The Data Controller ensures the right to data portability (Article 20) and, in the event of requests under Article 20, will provide data subjects with the data in a structured, commonly used, and machine-readable format.</p> <p>In cases where the legal basis is consent, Data Subject has the right to withdrawal the consent given without affecting the lawfulness of the processing based on the consent before the revocation.</p> <p>To no longer receive automated direct marketing communications (via email or social networks and sponsorships), Data subjects are invited to send an email to the address <a href="mailto:dpo.boffi@dpoprofessionalservice.it">dpo.boffi@dpoprofessionalservice.it</a> with the object 'unsubscribe from automated' or to use the automatic cancellation systems provided for email only (opt-out).</p>

	<p>To no longer receive marketing communications by traditional means (via telephone calls through operator and paper mail), Data subjects are invited to send an email to the address <a href="mailto:dpo.boffi@dpoprofessionalservice.it">dpo.boffi@dpoprofessionalservice.it</a> with the object 'unsubscribe from traditional'.</p> <p>To no longer receive any marketing communications by automated and by traditional means Data subjects are invited to send an email to the address <a href="mailto:dpo.boffi@dpoprofessionalservice.it">dpo.boffi@dpoprofessionalservice.it</a> with the object 'unsubscribe from marketing'.</p> <p>If data subjects believe that the processing of personal data by the Data Controller violates any provision of UE Regulation 2016/679, they are free to lodge a complaint with the national supervisory authority, especially in the Member State where they habitually reside or work, or where the violation occurred (Italian Data Protection Authority - <a href="https://www.garanteprivacy.it/">https://www.garanteprivacy.it/</a>), or to take appropriate legal action.</p>
	<p><b>8. UPDATES</b></p> <p>The Data Controller retains the right to modify, update, add or remove some parts of this notice at any time. In order to facilitate the verification of any changes, the notice will contain the update date</p>

Last review: 14/01/2025

**Data Controller**  
**BOFFI S.P.A.**