











PRIVACY POLICY - CUSTOMERS





Information notice pursuant to Art. 44 of Data Protection Act 2018 and art. 13 of the UK General Data Protection Regulation (UK GDPR)



	<p>WHO IS THE DATA CONTROLLER? HOW CAN I CONTACT HIM?</p> <p>The Data Controller is BOFFI UK LTD, with registered office in 72 - 74 Sloane Avenue SW3 3DZ - London in person of its legal representative. Contact details: Tel 020 3345 0170 E-mail address info@boffiuk.com</p>
	<p>MAIN DEFINITIONS (art. 4)</p> <p>Personal data means any information relating to an identified or identifiable living individual ("Data subject").</p> <p>Data subject means the identified or identifiable living individual to whom personal data relates. Data subject means the identified or identifiable natural person, whose personal data is being processed and to whom personal data relates An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.</p> <p>Data controller means the natural or legal person, public authority, agency, or other body which (alone or jointly with others) decides on the purposes and means of processing of personal data.</p> <p>"Processing", in relation to information, means an operation or set of operations which is performed on information, or on sets of information, such as— (a) collection, recording, organisation, structuring or storage, (b) adaptation or alteration, (c) retrieval, consultation or use, (d) disclosure by transmission, dissemination or otherwise making available, (e) alignment or combination, or (f) restriction, erasure or destruction.</p> <p>WHAT INFORMATION WE COLLECT, USE AND DISCLOSE</p> <p>We will process:</p> <ul style="list-style-type: none"> ❓ Identifiers including first name, last name, username or other similar identifier, postal address, email address and telephone numbers; customer master data (purchase or account history and information). ❓ Personal data involved in communications such as the contents and metadata of our communications with you through by email, telephone call and our communications with you by mail. ❓ Information related to our contractual relationship: payment information (payment details / billing details); purchase or account history; Information relating to your contact or requests (compliments or complaints) <p>WHERE WE GET PERSONAL INFORMATION FROM</p> <ul style="list-style-type: none"> ❓ Directly from you: we receive and store any information you provide us in relation to enter into a contract or precontract with us, by corresponding with us, through visiting our stores, telephone and email correspondence or otherwise. ❓ From Service Providers (If applicable): We may collect personal information about you from our service providers, including our email and telecommunications service provider. We might receive information about you from other sources, such as updated delivery and address information from our carriers, which we use to correct our records and deliver your next purchase more easily.

PURPOSE OF PROCESSING, LEGAL BASES, DATA RETENTION, NATURE OF CONFERRAL

 PURPOSE OF PROCESSING	 LAWFUL BASES	 DATA RETENTION	 NATURE OF CONFERRAL
<p>A) To perform a contract we have entered into or are trying to enter into with you (contractual and precontractual obligations) and to comply with legal requirements and obligations to which we are subject (legal obligations and</p>	<p>Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection</p>	<p>We will retain your personal data for no longer than is necessary to perform a contract or enter into a contract with</p>	<p>Data conferral is required due to a contractual relationship.</p> <p>The lack of conferral will prevent the contractual obligation to arise between parties</p>

 PURPOSE OF PROCESSING	 LAWFUL BASES	 DATA RETENTION	 NATURE OF CONFERRAL
<p>administrative/accounting purposes relate to the execution or the ceasing of contract).</p> <p>We collect or use your information to provide services and goods, including delivery; to comply with the operation of customer accounts and guarantees; for dealing your requests (queries, complaints or claims); to communicate with you.</p>	<p>rights may apply except the right to object.</p> <p>Legal obligation – we have to collect or use your information so we can comply with the law.</p>	<p>you and maximum for 6 years</p>	
<p>B) Management of legal aspects relating to our defence in case of precontractual or contractual disputes judgment</p>	<p>Legitimate interests: – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone.</p> <p>All of your data protection rights may apply, except the right to portability.</p>	<p>We will retain your personal data for no longer than is necessary to manage legal aspects: maximum for 6 years, except for the time required for any legal proceedings</p>	<p>The provision of data is mandatory. In case of lack, the data the Data Controller would not achieve his legitimate interest as stated for in this purpose. The refusal shall be balanced with the aforesaid data controller’s legitimate interest</p>
<p>C) Management of your requests and choices about your personal information collect, use and disclose by us (data subjects’ rights, pursuant to art. 15 et seq.)</p>	<p>Legal obligation – we have to collect or use your information so we can comply with the law.</p>	<p>We will retain your personal data for no longer than is necessary to manage your data subject’s requests: maximum 6 years after closure, except for the time required for any legal proceedings</p>	<p>Data conferral is mandatory, being indispensable to grant the fulfilment of any legal obligations</p>

	<p>WHO WE SHARE INFORMATION WITH</p> <p>We may share your personal data with the parties mentioned below for the purposes set out in the table above and other purposes as set forth in this section.</p> <ul style="list-style-type: none"> ❓ Our affiliated companies, group companies (including holding company) and business partners in the supply chain; ❓ Service providers and Contractors, including those who provide IT and telecommunications services in connection with e-mails boxes, services, websites, platforms and other professional services such as consulting services (such as professional or legal advisors and consultants; firms or Companies in the context of tax assistance and consultancy as well as administrative/accounting management relationships; business information companies evaluating solvency and payment habits and/or relating to debt collection) ❓ Banks; ❓ External auditors or inspectors; ❓ Subjects providing Audits or other certifications; ❓ Organisations and Public bodies we're legally obliged to share personal information with; ❓ Competent authorities for compliance with legal obligations and V or provisions of public bodies, upon request. <p>Subjects belonging to the aforesaid categories act as data Processors or in complete autonomy as separate data Controllers. The complete listing of Data Processors is available by writing us via email: info@boffiuk.com.</p>
	<p>SHARING INFORMATION OUTSIDE THE UK (art. 44 et seq.)</p> <p>Boffi Uk Ltd is a corporation located in the UK with related companies in Europe and the holding in Italy. Where necessary, we may transfer personal information outside of the UK. When doing so, we comply with the UK GDPR, making sure appropriate safeguards are in place.</p> <p>Your personal data, collected for the purposes above indicated, may be transferred to:</p> <p>Organisation name: Boffi s.p.a.</p> <p>Category of recipient: Company of the Group</p> <p>Country the personal information is sent to: Italy. Here your personal information is safe because the EU GDPR applies (art. 45)</p> <p>How the transfer complies with UK data protection law: international data transfer agreement (IDTA)</p> <p>For further information or to obtain a copy of the appropriate safeguard for the transfers above indicated, please contact us by writing us via email: info@boffiuk.com.</p>
	<p>IS THERE AN AUTOMATED PROCESS OR AUTOMATED DECISION-MAKING?</p> <p>NO. Personal data will be processed using traditional manual methods and electronic systems. It is specified that no fully automated decision-making processes are carried out.</p>
	<p>LAWFUL BASES AND DATA PROTECTION RIGHTS</p> <p>Under UK data protection law, we must have a lawful basis for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR. We indicate our lawful bases in the table above. Which lawful basis we rely on may affect your data protection rights which are in brief set out below. In particular, in case of:</p> <ul style="list-style-type: none"> - legal and contractual or precontractual basis all of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability; - legitimate interests basis, all of your data protection rights may apply, except the right to portability. <p>You can find out more about your data protection rights and the exemptions which may apply on the ICO's website:</p> <ul style="list-style-type: none"> ❓ Your right of access - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. You can read more about this right here. ❓ Your right to rectification - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. You can read more about this right here. ❓ Your right to erasure - You have the right to ask us to delete your personal information. You can read more about this right here. ❓ Your right to restriction of processing - You have the right to ask us to limit how we can use your personal information. You can read more about this right here.

	<p>❓ Your right to object to processing - You have the right to object to the processing of your personal data. You can read more about this right here.</p> <p>❓ Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. You can read more about this right here.</p> <p>If you make a request, we must respond to you without undue delay and in any event within one month. To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.</p>
	<p>HOW TO COMPLAIN</p> <p>If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.</p> <p>If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO https://ico.org.uk/make-a-complaint/</p> <p>The ICO's address: Information Commissioner's Office Wycliffe House- Water Lane Wilmslow Cheshire SK9 5AF Helpline number: 0303 123 1113</p>
	<p>We reserve the right to change this Policy. When we do, we will also revise the "Last Review" at the bottom of this Policy. Any changes we may make to this Policy will be effective upon being posted on this page. We encourage you to periodically review this Policy to keep up to date on how we are handling your Personal Information.</p>

Data Controller
BOFFI UK LTD