

PRIVACY POLICY

Information on the processing of personal data pursuant to EU Regulation 2016/679

With this notice, provided pursuant to Article 13 of the EU Regulation 2016/679, we provide the Data Subject with the information required by current legislation regarding the processing of his/her personal data. It should be noted that this information applies exclusively to data collected and processed for the purpose of and as part of registration and participation in the “Argiano Exceptional Club” program.

1) **Data Controller**

The Data Controller for the processing of personal data is Argiano S.r.l. Società Agricola (VAT number and tax code 00518460522), with registered office in (53024) Montalcino (SI), Località Sant'Angelo in Colle snc, e-mail address: argiano@argiano.net (hereinafter referred to as “Data Controller”).

2) **Type of data processed**

For the purposes of registration and participation in the “Argiano Wine Club” program, the Data Controller will process the following personal data of the Data Subject, namely:

- Personal data: first name, last name, residential address, nationality, landline and/or mobile phone, tax code, e-mail address(es), shipping addresses;
- Banking Data: IBAN and bank/postal data (except Credit Card number);
- System-related data: Log, source IP address.

3) **Purposes of Data Processing**

The Data Subject’s personal data will be processed for the following purposes:

- a) Purposes related to registration and participation in the “Argiano Exceptional Club” program: the processing of personal data is carried out to identify, register and enroll the Data Subject in the “Argiano Exceptional Club” program; to carry out activities related to the participation in the “Argiano Exceptional Club” program, not exercisable anonymously, necessary for the attribution of the benefits related to the package, including the enjoyment and recognition of promotions, the offer and sending of prizes, participation in promotional events reserved for program members, etc.; to ensure the proper functioning of the “Argiano Exceptional Club” program and resolve any problems;
- b) Sales Purposes: **personal data is processed to enable the tasks preliminary to and consequent upon the purchase of a product and/or service provided by Argiano S.r.l. Società Agricola on the part of the Data Subject, management of the related order, shipment of the purchased product and/or provision of the service, the related invoicing and management of the payment, the processing of any complaints, as well as the fulfillment of any other obligations (including legal obligations) arising from the contract;**
- c) Marketing purposes: the processing of personal data takes place, with the Data Subject’s express consent, to send newsletters and/or send e-mails containing informative, advertising and promotional material relating to the “Argiano Exceptional Club” program and more generally concerning the Argiano S.r.l. Società Agricola and its products;
- d) Profiling purposes: the processing of personal data takes place, with the Data Subject’s express consent, to carry out customer profiling activities on the basis of purchasing choices and information optionally provided during registration and enrollment in the “Argiano Exceptional Club” program, in order to carry out personalized promotions based on the profile of the Data Subject.

4) **Nature of the provision of data and legal basis of the Processing**

With reference to the purposes referred to in Art. 3), lett. a): i) the provision of personal data is necessary, given that registration and participation in the “Argiano Exceptional Club” program is not possible without

it; ii) the legal basis for processing is the performance of the services provided through the registration of the Data Subject in the program “Argiano Exceptional Club” (ex art. 6, paragraph 1, lett. b), GDPR), as well as the legitimate interest of the Data Controller consisting in ensuring the proper functioning of the “Argiano Exceptional Club” program, the rapid resolution of problems, and improvement of members’ user experience.

With reference to the purposes referred to in Art. 3), lett. b): i) the provision of personal data is necessary, given that the management of purchases made by the Data Subject is not possible without it; ii) the legal basis for processing is compliance with legal obligations to which the Data Controller is bound and fulfillment of the services inherent in the contractual relationship with the Data Subject.

On the other hand, with reference to the purposes referred to in Article 3, letters c) and d): i) the provision of personal data is optional and failure to provide such data will not prevent the Data Subject from registering in the “Argiano Exceptional Club” program and taking advantage of the related services and benefits; ii) the legal basis for processing is the Data Subject’s consent for processing.

5) Data Processing Methods

The processing of personal data is based on the principles of lawfulness, fairness and transparency as well as compliance with the principles of integrity and confidentiality, in accordance with current regulations.

The Data Controller processes personal data while taking appropriate security measures to prevent unauthorized access, disclosure, modification or destruction of personal data. The processing is carried out by means of computer and/or telematic and/or manual tools, using organizational methods and logic strictly related to the purposes specified.

6) Communication and access

In addition to the Data Controller, other parties involved in the “Argiano Exceptional Club” program (administrative, sales, marketing, legal, system administrators) or external parties (such as third-party providers of technical services, postal couriers, hosting providers, IT companies, communication agencies) also appointed, when necessary, as Data Processors by the Data Controller, may have access to personal data. The updated list of Data Processors can be requested from the Data Controller at any time.

Personal data may also be disclosed to third parties, if this is required by applicable laws or applicable regulations. If the recipients of the personal data are established outside the EU, in countries without an adequate level of personal data protection, the Data Controller will take all necessary measures to ensure that the transfer of the data outside the EU is adequately protected as required by the applicable privacy legislation.

7) Data Retention Period

Subject to legal obligations, the Data Subject’s personal data will be kept for a period of time not exceeding the achievement of the purposes of the data processing. In particular:

- with respect to the purposes of membership in the “Argiano Exceptional Club” program, personal data will be kept as long as the Data Subject continues to be a member;
- with respect to the purposes of marketing/commercial promotion, the Data Subject’s personal data will be retained for twenty-four (24) months from the time when consent was given, without prejudice to the right to revoke the consent given;
- with respect to the purposes of profiling, the Data Subject’s personal data shall be retained for twelve (12) months from the time when consent was given, without prejudice to the right to revoke the consent given;

8) The Data Subject’s Rights

The Data Subject, in the manner and within the limits specified in EU Regulation 679/2016 (GDPR) and current legislation, has the right to:

- revoke his/her consent at any time, without affecting the lawfulness of data processing based on the consent given before revocation;
- obtain from the Data Controller confirmation as to whether or not personal data concerning him/her are being processed, and if so, to obtain access to the personal data and information referred to in Article 15 of the GDPR;
- obtain from the Data Controller the rectification of inaccurate personal data concerning him/her without undue delay, as well as the integration of incomplete personal data, also by providing a supplementary declaration;
- obtain from the Data Controller the deletion (so called “right to be forgotten”) of personal data concerning him/her without undue delay, in the presence of one of the reasons referred to in Art. 17 of the GDPR and provided that the processing is not necessary for the purposes referred to in the 3rd paragraph of Art. 17 of the GDPR;
- obtain from the Data Controller restriction of the processing of their personal data, when one of the hypotheses referred to in Article 18 of the GDPR occurs;
- ask the Data Controller to provide details of the recipients to whom any rectification or erasure or restriction of processing carried out has been transmitted, unless this proves impossible or involves a disproportionate effort;
- receive, in a structured, commonly used and machine-readable format, the personal data concerning him/her provided to the Data Controller and, in the cases provided for in Article 20 of the GDPR, transmit the same data to another Data Controller without hindrance from the Data Controller to whom he/she provided them (so-called “portability”). The Data Subject, if technically feasible, also has the right to obtain the direct transmission of personal data from one Data Controller to another;
- object at any time, on grounds relating to his or her particular situation, to the processing of personal data concerning him/her under Art. 6(1)(e) or (f);
- where personal data are processed for direct marketing purposes, object at any time to the processing of personal data concerning him/her carried out for such purposes, including profiling insofar as it is related to such direct marketing;
- file a complaint with the Privacy Guarantor, this being the data protection supervisory authority;
- and, more generally, exercise all the rights granted to him/her under current legislative provisions.

The aforementioned rights may be exercised by means of a written communication to be sent by e-mail to argiano@argiano.net or a registered letter with return receipt sent to the registered office of Argiano S.r.l. Società Agricola, located in (53024) Montalcino (SI), Località Sant'Angelo in Colle snc.

9) Changes to the Policy

The Data Controller reserves the right to amend and/or update this policy at any time. Therefore, in order to facilitate the consultation of the text as amended and/or updated, this notice will contain the date of the update.

Privacy Policy updated as of July 2024