

PRIVACY POLICY

(Information on the processing of personal data - Article 13 of EU Regulation 679/2016)

Update: May 2021

Foreword

Pursuant to European Regulation no. 679/2016 (hereinafter the "Regulation"), BELMAC SRL invites you to carefully read this Privacy Policy which contains important information on the protection of your Personal Data.

The processing of your Personal Data will be based on the principles of fairness, lawfulness, transparency, purpose limitation and storage, minimization and accuracy, integrity and confidentiality, in accordance with the provisions of the Regulation.

In accordance with the Regulation, BELMAC informs you that the Personal Data that you may provide will be processed in compliance with the aforementioned legislation and according to the criteria indicated below.

1) DATA CONTROLLER

The owner of the processing of Personal Data is BELMAC SRL (hereinafter "BELMAC" and / or "Owner") with registered office in Forlì - Via Balzella 71/B int 3, in the person of the legal representative pro tempore.

2) PERSONAL DATA PROCESSED

The following categories of Personal Data will be processed by BELMAC:

Personal data

Contact data (email, address, telephone number)

Geo-location data and / or internet browsing data collected through cookies installed on your computer or mobile device (for more information see the Cookie Policy)

Bank data useful for the management of the commercial relationship

Photographic images and/or video footage

In addition to the above categories of Personal Data, further data shared by you may be processed on the pages of social networks dedicated to BELMAC (Facebook, Twitter, Instagram, etc.), for the management of which please refer to the third parties that provide these services. Among the data collected through social networks are, for example, the likes, comments, and generally any content and information that you may have published on the pages and / or accounts owned and directly attributable to BELMAC.

The data provided will be processed for the purposes of this Policy and will be stored in such a way as to ensure full respect for privacy.

3) PURPOSE AND LEGAL BASIS OF THE PROCESSING

The processing of the Personal Data provided by you will be carried out in compliance with the regulations in force concerning the processing of Personal Data. Your data will be collected and processed for the following purposes:

- Inclusion in our database: the Personal Data you provide will be included in our database and will be used to carry out statistical analyses, in an aggregate manner, on the composition of the database itself. The provision of data is optional. The legal basis of the processing is the consent of the interested party, which may be revoked at any time.
- Registration to the Website: the procedure of registration to our Website, through the creation of an account or the use of an existing social network account, is aimed at allowing you to use the Website as a "Registered User" and to access a series of exclusive services offered through it. The provision of data is optional. The legal basis for the processing of your data is your consent, which may be revoked at any time.
- Purchase of products: through the use of our Website you may purchase BELMAC products either as a Registered User (in which case you will not have to re-enter all your Personal Data for each

purchase) or as a Non-Registered User (by re-entering all the data required to complete the purchase). Both cases will involve the processing of your Personal Data.

Your Personal Data will be processed in order to manage orders and payments and to carry out the consequent administrative-accounting fulfilments as well as to contact you for any communication related to the purchases themselves (e.g. information on the progress of your orders). The provision of data is optional, but necessary to complete the purchase order. The legal basis for such processing is the execution of the Contract.

3.1 Additional Purposes:

- Participation in events and promotional initiatives: subject to your express consent, we may process your Personal Data in order to allow your participation in competitions and prize operations, to take advantage of discounts or promotions reserved for Customers, to subscribe to our newsletter, to receive commercial communications and promotional initiatives. The legal basis for such processing is the consent of the data subject, which may be revoked at any time.

- Profiling activities: subject to your express consent, we may process your Personal Data for profiling purposes, i.e. to carry out market analyses and data processing for statistical purposes in addition to analysing or predicting your tastes, potential habits and consumption choices in order to be able to offer you customised products, services, promotions and commercial communications. The legal basis for such processing is the consent of the data subject, which may be revoked at any time.

Profiling activities may also be carried out through the use of proprietary and third-party cookies. We invite you to read our Cookie Policy. Such processing may be carried out on condition that you provide additional specific and optional consent.

- Any further purpose for which you have expressly provided your consent, which may be revoked at any time.

4) NATURE OF THE CONFERMENT

The provision of your Personal Data is optional. However, failure to provide your Personal Data may affect your ability to take advantage of certain services (e.g. to place orders and purchases, to participate in competitions and prize operations; to receive newsletters, etc.).

The compulsory or optional nature of the conferment will be indicated from time to time through the use of symbols (e.g. "**") placed next to the information whose conferment is compulsory to pursue the respective purpose.

5) PROCESSING METHODS

Your Personal Data will be processed in compliance with the provisions of the laws in force regarding the processing of Personal Data both with the aid of electronic and automated means and manually. Your data will be processed in such a way as to guarantee maximum security and confidentiality and only by persons trained and authorised to process them. The Data Controller adopts technical and organisational measures to guarantee a level of security appropriate to the risk of processing.

6) RECIPIENTS OF THE DATA

Your Personal Data may be made accessible, for the purposes mentioned above, to employees and collaborators of BELMAC, in Italy and abroad.

The Personal Data you provide may be communicated to companies belonging to the BELMAC Group and/or to third party companies that carry out activities in Italy and abroad on behalf of the Data Controller, in their capacity as Data Processors.

The Data Controller has compiled a list of Data Processors, which is constantly updated and which is available to you by contacting the addresses listed in section 10 of this Information Notice.

Finally, your Data may be transmitted to the judicial authorities where necessary and in the cases provided for by law.

7) DATA RETENTION PERIOD

The Personal Data you provide will be stored in our database for the following periods:

The Personal Data provided by you and acquired by us as a prospect (a person with whom there is no relationship relating to the supply of goods or services) will be stored in our database for 24 months and subsequently deleted if there is no further contact.

Website Registration: The Personal Data provided by you to make the Website Registration will be kept for the duration of your registration on the Website. In case of inactivity for 24 months, your Account will be deleted.

Invoicing data will be kept for a period of time to ensure the proper execution of the contract and in any case for a further 10 years for the purpose of fulfilling the related administrative and tax obligations.

The data collected for the management of competitions and prize operations shall be kept for the entire duration of the prize operation and for a period of time sufficient to guarantee its correct execution. This is without prejudice to the fulfilment of administrative and fiscal obligations in relation to which the period of data retention is that provided for by law.

Data collected for profiling purposes and for the purpose of sending promotional/advertising material shall be kept for a period of time not exceeding 12 and 24 months respectively, or such other period as may be indicated by the supervisory authorities.

8) DATA FROM MINORS

BELMAC does not normally intend to collect Personal Data from children or deliberately establish communication with them. For this reason, we encourage parents to actively monitor the online activities of their children under the age of sixteen.

Nonetheless, in the event that we are in contact with a child, we will take all reasonable steps to provide the parents or guardians with the opportunity to give their consent prior to the use of the child's Personal Data, except to respond to the child's question or resolve a request.

9) RIGHTS OF THE DATA SUBJECT

You may at any time exercise against the Data Controller the rights provided for in Articles 15 et seq. of the Regulation, including:

- a) the right to obtain confirmation of the existence or otherwise of personal data concerning you, even if not yet recorded, and their communication in intelligible form;
- b) the right to revoke at any time the consent given by you in relation to the purposes of the processing;
- c) the right to obtain access, rectification, erasure, restriction of processing and portability of personal data
- d) the right to object to the processing at any time you wish
- e) the right to appeal to the competent supervisory authority if you believe that the processing of your data is contrary to the legislation in force.

10) WAYS OF EXERCISING YOUR RIGHTS

Should you wish to exercise the aforementioned rights, or should you wish to receive further clarification regarding the processing of your personal data, you may write to the Data Controller at the e-mail address: amministrazione@belmac.it or at the address of its registered office, located in Via Balzella 71/B int 3, 47122, Forlì (FC), Italy.