



ITALIAN LUXURY FURNITURE

## **PRIVACY**

### **Informative document pursuant to and in accordance with Article 13 of (Italian) Legislative Decree no. 196 of 30<sup>th</sup> June 2003 Privacy Policy**

Pursuant to (Italian) Legislative Decree no. 196 of 30<sup>th</sup> June 2003 (Consolidation Act on Privacy) and subsequent amendments, we hereby provide the relevant information regarding the processing of personal and potentially sensitive data held by us.

### **Purposes of data processing for which consent is granted where required (Art. 23 of Legislative Decree no. 196/03)**

Personal and potentially sensitive data, voluntarily provided, shall be processed for the following purposes:

- sending of information requested by you (if relevant);
- entering of your name or company logo into this Internet website (if relevant);
- administrative activities strictly related and instrumental to the management of relations with customers (e.g.: acquisition of preliminary information for stipulating contracts, carrying out of operations based on obligations deriving from contracts stipulated with customers, etc.);
- accounting activities (issuing of invoices, carrying out of payments) and possible transfer of data abroad within the limits of the law;
- supply of goods and services, and safeguarding of receivables thereof;
- informative activities, formalising requests for information on products and services, and drafting quotations or offers;
- mailing list registration, informative-commercial and statistical activities, until they are objected to.

### **Processing method - Data storage**

The data will be processed automatically and/or manually, with methods and instruments which guarantee maximum security and confidentiality, by subjects specifically assigned to this task in compliance with the provisions of Articles 31 and subsequent of Legislative Decree no. 196/03. The data will be stored for the time necessary to fulfil the purposes for which it was collected and subsequently processed.

### **Ambit of communication and disclosure**

#### **Como Design is a brand owned by Pasi Srl.**

The data subject to processing will be disclosed solely within the limits specified in the following informative document for acquiring consent; however, it may be transmitted to affiliates of **Como Design**, either abroad or within the European Union, in conformity to and within the limits of Art. 42 of Legislative Decree no. 196/2003, in order to fulfil the contracts or for related purposes. The data may be transmitted to third parties belonging to the following categories:

- subjects that provide services for managing the IT system implemented by **Como Design** and telecommunication networks (including email);
- service companies for acquiring, recording and processing data taken from documents, or supports provided and created by customers concerning mass operations relative to payments, bills of exchange, cheques and other instruments;
- subjects providing assistance services to customers (e.g. call centres, help desks, etc.);
- professional firms or companies providing assistance and consulting services; subjects engaged in the control, auditing and certification of the activities carried out by **Como Design**, also in the interest of customers.
- authorities responsible for the fulfilment of legal requirements and/or provisions of public bodies, on request; The subjects belonging to said categories act as Data Processors, or operate in a fully autonomous manner as distinct Data Controllers. The list of potential data processors is constantly updated and is available at the headquarters of **Como Design**. Any further communication or disclosure of data will only occur with the prior consent of the data subject.

### **Nature of the data provision**

Providing personal data is optional; however, in the absence of personal data, **Como Design** may not be able to provide the necessary services for fulfilling the relevant contractual, accounting or fiscal obligations. Furthermore, the Data Controller notifies that the non-transmission, or incorrect transmission, of any mandatory information determines the following consequences: 1) the impossibility on the part of the Data Controller of guaranteeing conformity of the data processing to the contractual agreements for which it is performed; 2) the potential non-compliance of the results of the data processing with the obligations of fiscal, administrative or employment regulations for which it is required. You may exercise your rights as expressed by Articles 7, 8, 9 and 10 of Legislative Decree no. 196 of 30<sup>th</sup> June 20063, by contacting the Data Controller, our company, in the person of its legal representative who, pursuant to Art. 29 of the Consolidation Act on Privacy, has designated Mr. Enrico Bonetti as Data Processor, to whom you may refer for exercising the rights in accordance with Art. 7 of Legislative Decree no. 196/03, by contacting our headquarters at +39 039 2454002 (telephone) or sending an email to [info@comodesign-italy.com](mailto:info@comodesign-italy.com)

### **Art. 7. Right of access to personal data and other rights**

1. The data subject is entitled to obtain confirmation of the existence or non-existence of personal data regarding him, even if not yet registered, and to receive communication of such data in intelligible form. 2. The data subject is entitled to obtain the following information: a) the origin of the personal data; b) purposes and methods of processing; c) the logic applied in the case of electronic processing; d) identification details of the data controller, data processors and the representative designated in accordance with Article 5, paragraph 2; e) the subjects and categories of subjects to whom the personal data may be disclosed or who may gain knowledge of such data in their capacity as the designated representative in the territory of the State, processors or other designated persons. 3. The data subject is entitled to obtain: a) the updating, correction or - when in his interest - integration of the data; b) the erasure, conversion into anonymous form or blocking of any data processed unlawfully, including data that does not need to be stored for the purposes for which it was acquired and subsequently processed; c) a statement that the operations in a) and b) above have been notified, also along with the content thereof, to the subjects to which the data was communicated or diffused, except in cases where such action is impossible or entails the use of resources manifestly out of proportion in relation to the safeguarded right. 4. The data subject is entitled to object, in part or entirely: a) for legitimate reasons, to the processing of personal data regarding him, even if relevant to the scope of data collection; b) to the processing of personal data regarding him for the purpose of transmission of advertising or direct sales material, or for market research or commercial communication purposes.

The session cookies used are aimed at speeding-up the analysis of Internet traffic and facilitating users in accessing the services offered on the website; their use does not entail the acquisition or transmission of personal data nor are user tracing systems implemented.

### **The Data Controller is:**

**Como Design**, in the person of its legal representative *pro tempore* and Privacy Manager Mr. Giuseppe Trenzani, to whom the data subject may refer for exercising his rights in accordance with Art. 7 of Legislative Decree 196/03, by contacting our headquarters at +39 039 2454002 (telephone) or sending an email to [info@comodesign-italy.com](mailto:info@comodesign-italy.com)