

NOTICE ON THE PROCESSING OF PERSONAL DATA

Below are the information required by articles 13 and 14 of the Regulation (EU) 2016/679 (“**GDPR**”) on the processing of personal data of the so-called “prospect” (i.e., potential customers; hereinafter “**Prospects**”).

Prospects interact with VezzDesign in various ways, giving some personal data in order to establish a business relationship (e.g., exchange of data during a trade event, request for quote, etc.).

1. Identity and contact details of the data controller

The data controller **VezzDesign S.r.l.**, VAT 01330530195, with registered office in Via Cremona n. 94, 26013 – Crema (CR) (hereinafter “**VezzDesign**” or “**Controller**”).

The Data Controller can be contacted at the e-mail address info@vezzdesign.it.

2. Categories and sources of data

The data being processed are of a "common" nature, such as identifying, contact and job role information.

The data are provided either directly by the data subject (such as the Prospect - natural person as well as the legal representative or corporate contact person in the case of Prospect - legal person) or by another person involved in the business relationship (e.g. another corporate contact person).

In the case of an trade show or similar event (hereinafter, "**Event**"), the data are either collected directly by VezzDesign (e.g., by exchange of the business card) or have been communicated to it by the Event organizer. In the latter case, the visitor has shown at VezzDesign's stand the QR on the Event entry ticket, thus consenting to such communication, as indicated in the privacy policy of the said organizer.

3. Purposes and legal basis of the processing – data retention period

Purpose	Legal basis	Data retention
Processing the Prospect's request (e.g., request for quotation).	Taking steps at the request of the data subject prior to entering into a contract (art. 6.1, lett. b) GDPR). With regards to data of employees/collaborators of the Prospect - legal person, the legitimate interest of the Controller and the third party (the Prospect itself) referred to in Art. 6.1, lett. f) GDPR.	Exclusively for the time necessary to process the user's request, subject to retention obligations established by law (such as the 10-year retention obligation under Article 2220 of the Civil Code).
Fulfillment of legal obligation, such as those in taxation and accounting.	Compliance with a legal obligation to which the Controller is subject (art. 6.1, lett. c) GDPR).	
If requested and consented to by the data subject, sending of commercial communications about VezzDesign products and services by e-mail, regular mail and telephone.	The consent of the data subject (art. 6.1, lett. a) GDPR), given by (i) ticking the appropriate "tick-box" in the form on the Controller's website, (ii) signing the appropriate form, where submitted to the data subject, and (iii) in the case of the Event, active behavior (i.e., by providing one's business card or exhibiting the QR as above).	For 10 years, without prejudice to the right to object and the right to revoke consent (in the manner specified in par. 5 below).

4. Provision of data

The data are necessary for the purpose of processing the request; therefore, failure to provide them does not allow the request processing.

5. Recipients of the data

The data may also be processed by other parties, suppliers of the Controller (e.g. in IT or marketing and communication), who process them as data processors, with whom special agreements have been entered into pursuant to Article 28 GDPR.

VezzDesign's employees, who have been expressly authorized for this purpose and have received appropriate operational instructions, are also involved in data processing.

The Controller transfers data outside the EU or the EEA and in particular to the United States, where IT service providers are established, a third country deemed appropriate by virtue of the European Commission Decision of July 10, 2023 - EU-US Data Privacy Framework. Where the Controller also transfers data to entities established in third countries without an adequacy decision, the transfer will be based on appropriate mechanism under Article 46 of the GDPR (in particular, standard contractual clauses).

6. Data subjects' rights

Data subjects may exercise their rights under the GDPR by sending an e-mail to the Controller to the address indicated in par. 1 above. In particular, they have the right:

- to obtain the confirmation as to whether or not personal data concerning them are being processed, and, where that is the case, access the data concerning them in accordance with Article 15 GDPR,
- to obtain the rectification of inaccurate data,
- to have incomplete data completed,
- to obtain the erasure of data in the cases provided for by Article 17 GDPR ("right to be forgotten"),
- to obtain restriction of processing in the cases provided for by Article 18 GDPR,
- to object, at any time, on grounds relating to their own particular situation, to the processing carried out in the legitimate interest of the Controller,
- where the processing is based on consent or contract and is carried out by automated means, to receive the data in a structured, commonly used and machine-readable format and to transmit those data to another controller without hindrance from the controller to which the personal data have been provided ("right to data portability");
- withdraw the consent previously given;
- to lodge a complaint with the competent supervisory authority in the Member State of their habitual residence, place of work or place of the alleged infringement.