Personal data processing information notice "newsletter"



1. Who is the data controller (who decides which data to process and how)?

The data controller, as defined in Art. 4, para. 1, no. 7 of EU Regulation 2016/679 (General Data Protection Regulation, hereinafter the GDPR), is **Storti SpA**, with registered office in Via Francesco Dioli, 11, 26045 Motta Baluffi (CR), tax code and VAT number 00765230198, hereinafter the "***Company***".

Pursuant to Art. 13 of the GDPR, the following information is provided on the processing of personal data.



2. Who are the data subjects (the recipients of this notice)?

The data subject is the natural person to whom the personal data being processed by the Company relate. For the purposes of this notice, the data subject is the person who subscribes to the Company's newsletter service, hereinafter referred to as the "***Subscriber***".



3. What data are collected, and what are the purposes and legal bases for processing them (why are the data collected)?

The personal data, voluntarily provided by the Subscriber, are collected through the newsletter platform and processed for the following purposes:

a) to send commercial communications and/or communications relating to the Company's direct marketing activities, namely to send newsletters, promotional material or communications concerning specific events/projects, by automated e-mail, post, telephone calls made by an operator and other information material;
b) to send invitations to take part in statistical analyses by post, telephone, e-mail, SMS or messaging apps.

For completeness, we would like to point out that, to send its communications, the Company uses the MailUp newsletter sending platform, which, by means of statistical tracking systems (e.g. web beacons, tracking pixels, etc.), detects when a message is opened, the clicks on the hyperlinks contained in the e-mail, the IP address or type of browser used to open the e-mail, and other similar details.

The collection of such data is instrumental for the use of the platform and forms an integral part of the functionality of the message delivery system.

You can find information about the data use and GDPR compliance of the MailUp newsletter sending platform here.

The legal basis legitimising the processing of these data for the stated purposes is the Subscriber's consent (Art. 6.1(a)).



4. Is the provision of data compulsory or optional?

Providing the data for the purposes referred to in point 3 is optional, and their use is subject to explicit consent being given. Any refusal will make it impossible for the Company to send newsletters and advertising material or invitations to its events and initiatives.

Please note that the Subscriber may decide at any time to unsubscribe from the newsletter service by clicking on the relevant link at the bottom of each e-mail, or by contacting the Company directly.

Likewise, the Subscriber may choose not to allow the use of tracking pixels in communications by disabling them via the relevant link to the tracking opt-out page included in every message sent by the Company.



5. Where are the data processed, how are they processed, and for how long?

The data collected are processed at the Company's premises and at the data centres of the MailUp newsletter sending platform, duly designated as Data Processor, as well as at the premises of third parties, also appointed as Data Processors, or, as the case may be, of all the parties required for the proper fulfilment of the purposes set out in point 3.

For completeness, information on the data use and GDPR compliance of the MailUp newsletter sending platform can be found here.

The data collected shall be processed by electronic means or otherwise automated, computerised and telematic tools, or by means of manual processing with logic strictly related to the purposes which the personal data were collected for and, in any event, in such a way as to guarantee their security.

The data are stored for the time strictly necessary to manage the purposes for which the data are processed ("principle of storage limitation", Art. 5, EU Regulation 2016/679), or until consent is withdrawn, or in compliance with the deadlines set forth by current regulations and legal obligations.



6. Who is authorised to process the data, and to whom may they be disclosed?

The processing of the data collected is carried out by the Company's own personnel, identified for this purpose and authorised to process them in accordance with specific instructions given in compliance with the applicable regulations.

Within the limits relevant to the stated processing purposes and where necessary or instrumental to their fulfilment, the data collected may be processed by third parties appointed as external Data Processors or, as the case may be, disclosed to them as independent controllers, namely companies, bodies and associations providing services connected with and instrumental to the fulfilment of the above purposes (e.g. market analysis and research services, marketing consultancy, etc.).

The data collected may be provided in the event of a legitimate request by the Judicial Authority, solely in the cases provided for by law.

Under no circumstances and for no reason whatsoever shall your data be disseminated.



7. Can the data being processed be transferred to countries outside the EU?

The data may be transferred abroad to non-European countries, and in particular to the United States, only after verifying the Standard Contractual Clauses adopted/approved by the European Commission pursuant to Art. 46, para. 2, letters c) and d) of the GDPR, or the binding corporate rules referred to in Art. 47 of the GDPR or, failing that, by virtue of one of the derogatory measures referred to in Art. 49 of the GDPR.

Transfer to the United States is authorised under the specific agreement called the EU-US Data Privacy Framework (available here), so no further consent is required.



8. What are the rights of the Subscriber?

In relation to the personal data provided, the Subscriber has the right to exercise the following rights:

a. (Art. 7.3 EU Regulation 679/2016 – GDPR) withdrawal of consent;
b. (Art. 15 EU Regulation 679/2016 – GDPR) access and obtain a copy;
c. (Art. 16 EU Regulation 679/2016 – GDPR) request rectification;
d. (Art. 17 EU Regulation 679/2016 – GDPR) request erasure ("right to be forgotten");
e. (Art. 18 EU Regulation 679/2016 – GDPR) obtain restriction of processing;
f. (Art. 20 EU Regulation 679/2016 – GDPR) receive them in a structured, commonly used and machine-readable format for the purpose of exercising the right to portability;
g. (Art. 21 EU Regulation 679/2016 – GDPR) object to the processing.

The Subscriber may exercise their rights, as well as request further information regarding their personal data, by sending an e-mail to privacy@storti.it specifying the content of their request in the subject line.

Requests relating to the exercise of the Subscriber's rights will be processed without undue delay and, in any event, within one month of the request; only in cases of particular complexity or where there is a large number of requests may this deadline be extended by a further 2 (two) months.

We would like to remind you that it is your right (pursuant to Art. 77 EU Regulation 679/2016 – GDPR) to file a complaint with the Data Protection Authority, whose contact details are available here.

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