

INFORMATION ON DATA PROCESSING - PRIVACY

Information pursuant to Article 13 of Legislative Decree n.196 from 30 June 2003 on the protection of personal data and Article 13 of the EU Regulation 679/2016 - General Data Protection Regulation ("GDPR")

Pursuant to and for the purposes of the aforementioned legislation, our company hereby wishes to inform you in advance of the use of your personal data as well as your rights, by informing you of the following:

1. DATA HOLDER AND DATA PROTECTION OFFICER

The data controller is Luxvita s.a.s. of Manzhos Olena & C. with registered office at Via E. Romagnoli 1, 20146 Milan, VAT number/C.F. 07604050968, REA MI 1970497, hereinafter referred to as the 'Company'. The updated list of persons responsible for data processing, with their relative areas of competence, is available at the Company's head office.

2. PERSONAL DATA - PURPOSE OF PROCESSING

We use some of your data in order to execute our activities, and to satisfy your request for services. This includes identification data, contact details (address, home and mobile telephone numbers, fax, email) and property-related data.

3. PURPOSE, LEGAL BASIS AND MANDATORY OR VOLUNTARY NATURE OF DATA PROCESSING

Some of the data provided by you will be collected by our staff and our collaborators, by computer and telecommunication means, in order to be able to carry out our activity, to execute a contractually agreed service or operation or to verify the contractual relationship and the risks associated with them.

Please note that the provision of such data is mandatory in the sense that, otherwise, we would not be able to fully or partially fulfil the aforementioned legislation, and that your data may also be collected from other parties. Some information, then, might be communicated by you or by third parties for legal obligations.

Your identification data will also be processed to fulfil our obligations under the laws of the State, regulations and Community legislation, or by provisions issued by authorities authorised to do so by law and by control or supervisory bodies. We do not require your consent to process this data. The information relating to your property, including photos, will also be processed for the conduct of promotional and commercial practices aimed at the proper execution of the contractually agreed service, and may therefore be disseminated through publication on websites, social networks and / or paper publications of the company.

Your email address contact details may be used by the company to send you commercial communications about products and services similar to those already provided, pursuant to and for the purposes of paragraph 4 of article 130 of Legislative Decree 196/2003. You may object to

the treatment of your data in this way at any time. Such opposition will have no effect on the pursuit of the main purpose of executing the Company's activities.

4. RECIPIENTS

Your data will be disclosed to our internal administrative staff and to our external collaborators, a list of which is available at our office, and will also be communicated to our service providers such as IT companies, outsourcing companies, consultants and freelancers, insurance companies, technicians, accountants, debt collection companies, fraud control companies, entities and / or charity institutions, companies or bodies appointed by us to be responsible for processing, a list of which is at your disposal at our offices.

5. TRANSFERS

Some of Your Personal Data are transferred to Recipients who may be located outside the European Economic Community. The Data Holder ensures that the electronic and paper processing of Your Personal Data by Recipients is carried out in compliance with the applicable law. Indeed, transfers are based either on a decision based on adequacy or on the Standard Model Clauses approved by the European Commission. Further information and a copy of these agreements can be obtained from the Company.

6. DATA CONSERVATION

All personal data provided will be processed in compliance with the principles of lawfulness, correctness, relevance and proportionality, only with methods, including computer and telematic, strictly necessary to pursue the purposes described above. In any case, personal data will be kept for a period of time not exceeding that strictly necessary to achieve the purposes indicated. Personal data that do not need to be kept for the purposes indicated will be deleted or transformed into anonymous form. Please note that the information systems used to manage the information collected are configured, in their original state, to minimise the use of data.

7. YOUR RIGHTS

Finally, please note that in your capacity as an interested party, you have the rights set forth in article 7 of the Privacy Code and article 15 GDPR and in particular, the rights:

- to be informed of the existence or not of personal data relating to you, even if you have not yet registered, and to have access to the data in an intelligible form;
- obtaining information on:
 - a. the origin of the personal data;
 - b. the purposes and methods of data processing;
 - c. the logic applied in the event that data processing is carried out with the aid of electronic instruments;
 - d. the identification details of the Company, of the managers and of the designated representative pursuant to article 5, paragraph 2 of the Privacy Code and article 3, paragraph 1 of GDPR;

- e. the entities and categories of entities to whom the personal data may eventually be communicated or who may come to acquire knowledge of them as appointed representative in the territory of the State, as managers or as agents;
- to:
 - a. update, modify your data, or when it interests you, to integrate data;
 - b. cancel, transform into anonymous form or block data processed unlawfully, including data whose retention is unnecessary for the purposes for which the data were collected or subsequently processed;
 - c. attest that the operations referred to under points a) and b) have been brought to your attention; in particular, their content, information regarding the parties to whom the data have been communicated or disseminated, except in a case where this proves impossible or involves using means manifestly disproportionate to the protected right;
- oppose, in whole or in part:
 - a. for legitimate reasons, the processing of personal data concerning you, even if pertinent to the purpose of the collection;
 - b. the processing of personal data concerning you for the purpose of sending advertising or direct sales material or for carrying out market research or commercial communication, through the use of automated call systems without the intervention of an operator by email and / or through traditional marketing methods by telephone and / or post.

Where applicable, you also have the rights referred to in Articles 16-21 GDPR (Right to rectification, right to erasure, right to restrict processing, right to data portability, right to object), as well as the right to complain to the Guarantor Authority.

You can contact the Data Controller on the following addresses: by email info@luxuryvillaitaly.com, or by post to Luxvita s.a.s. of Manzhos Olena & C., Via E. Romangoli 1, 20146 Milan - Italy.