



DONNAFUGATA®

PERSONAL DATA PROCESSING POLICY

Personal data processing policy pursuant to Article 13 of Legislative Decree No. 196 dated 30th June 2003 ("Personal Data Protection Code") and Articles 13 and 14 of EU Regulation 2016/679 ("Regulation").

TENUTA DI DONNAFUGATA S.r.l. Società Agricola ("Donnafugata"), provides the information related to the processing of personal data of users who register to and browse the "Wine Club" portal at the web address <https://wineclub.donnafugata.it/en/iscrizione/> (the "Portal").

1. Types of data collected

Browsing data

The computer systems and software procedures involved in the Portal's operation acquire, during their normal operation, some personal data, the transmission of which is implicit in the use of Internet communication protocols. This category includes the IP addresses or domain names of computers used by users to connect to the Portal, the iMAC (Media Access Control) address, URI (Uniform Resource Identifier) form addresses of the resources requested, the time of the request, the method used to submit the request to the server, the size of the file obtained in reply, the numerical code indicating the status of the reply given by the server (done, error, etc.) and other parameters concerning the user's operating system and computer environment. This data is used for the sole purpose of obtaining anonymous statistical information concerning use of the Portal and checking that it is operating correctly. The data is deleted immediately after it has been processed. This data may be used to ascertain responsibility in the case of hypothetical computer crimes.

Data supplied voluntarily by natural and legal persons

Users who intend to use the Portal's services must submit a request to register with the Portal. For the purpose of said registration, users are asked to provide a series of personal data, the communication of which is required in order to supply the services offered by the Portal, which consist of sending newsletters, sending information, including personalised information and promotional campaigns related to the purchase of Donnafugata's products.

Within this context, Donnafugata processes:

- data identifying the user;
- contact data;
- sales information and data related to the user's tastes and preferences.

2. Purpose and legal basis for processing personal data

Data supplied to and collected by Donnafugata will be processed for the following purposes:

- a.** to monitor the operation of the Portal and the services offered (anonymous data processing);
- b.** in the event that express consent has been given, for marketing and profiling purposes.

In this case, consent given to the processing of personal data authorises Donnafugata to send promotional offers and marketing messages, including personalised ones, related to Donnafugata's products and services using automated means, such as email, as well as conventional means such as postal mail or operator-assisted phone calls. Said processing therefore involves analysis of the user's profile in order to determine the preferences of the same and ensure promotional messages sent are as targeted and

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interesting as possible. It is understood that registration to the Portal and therefore to the newsletter (constituting the main service offered by the Portal) may be cancelled at any time, at no cost to the user, by following the instructions included at the bottom of each communication received.

Failure to provide data during the registration process will prevent the completion of said registration and will therefore prevent Donnafugata from providing the services offered by the Portal.

The legal basis for processing the data provided for the purposes mentioned above consists of the need to perform the **service agreement** in accordance with that requested by the user and/or the **consent** given by the user during registration to the Portal.

3. Data processing methods

Data collected will be handled, stored and processed using electronic means and will be saved on electronic media as well as on paper, in databases and on any other suitable type of media. Specific security measures are taken to prevent data loss, unlawful or incorrect use of the data and unauthorised access to the same.

The data will not be distributed to third parties, with the exception of companies, associations or professional offices involved in management of the Portal (including *web hosting* services) or that perform user requests. A list of third parties that may receive the personal data is available on request from the contact details specified in Point 6.

In addition to the purposes specified in Point 2, data may be processed to fulfil obligations set forth by laws, regulations or EU legislation and in accordance with provisions set forth by supervisory authorities.

The personal data provided may be transferred out of the country to other countries located within the European Union. If required, transfer of the data subject's personal data to countries located outside of the European Union will only be performed when adequate and appropriate safeguards have been provided pursuant to applicable legislation and in particular Articles 45 and 46 of the Regulation.

The website that hosts the Portal uses cookies: for further information, please read the Cookie Policy at the following URL: <https://www.donnafugata.it/en/cookies-policy/>.

4. Data retention period

Personal data collected and processed as a result of a user browsing the Portal will be retained for the time needed to perform the services requested by the customer and then immediately deleted, with the exception of that specified in the cookie policy referred to in Point 3.

The data will be processed until such time as the interested party revokes their consent by sending a written communication to the email address privacy@donnafugata.it or by following the procedure to cancel registration to the Portal (following the instructions provided at the bottom of each communication received).

The data collected and processed will in any case be retained for a period of time not exceeding that required for the purposes for which it was collected or subsequently processed, including for the purpose of fulfilling contractual or legal obligations and to document the activities performed, as well as to protect Donnafugata's legitimate interest in protecting itself from any liability that may derive from the processing and until any possible action against it has become unenforceable.

5. Rights of the data subject



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With regard to the data processing mentioned above, the data subject has the right, at any time, to exercise the rights set forth in the Personal Data Protection Code (Article 7) and the Regulation (Articles 15, 16, 17, 18, 19, 20 and 21), namely the right to: a) access their personal data; b) request the rectification, updating, integration, deletion, limitation or portability of said data; c) object to the processing of said data; d) withdraw their consent to the processing of said data and e) lodge a complaint with the Personal Data Protection Authority, in accordance with the procedures and instructions published on the website www.garanteprivacy.it.

6. Data controller – Contact data

The data controller is: Tenuta di Donnafugata S.r.l. Società Agricola, Via S.Lipari,18, Marsala TP, Italy, VAT No. 01155720814, Tel/Fax +39 0923 724201/+39 0923 724211. Contact the data controller by sending an email to privacy@donnafugata.it for any clarification required concerning the data processing methods and to exercise the rights set forth above.

Donnafugata reserves the right to update this personal data processing policy.