

PRIVACY POLICY

DATA CONTROLLER AND CONTACT DETAILS:

ESSENZA S.r.l. with offices in viale Cav. Pasquale Vena s.n.c., Pisticci Scalo – Matera – VAT and Tax Code: 01333670774 – tel. [0835-4691] - e-mail: essenzalucana@legalmail.it, hereafter for the sake of brevity referred to as “**Essenza**”

All users can contact the “*data controller*” (as defined in article 4 – paragraph 1 – number 7 of the GDPR) for all questions relating to the processing of their personal data and to exercise their rights as outlined in the above mentioned Regulation.

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Pursuant to Legislative Decree 196/2003 and subsequent modifications – The Italian Data Protection Code and EU Regulation 2016/679 – General Data Protection Regulation (“GDPR”), deem the confidentiality of personal data and protection of the same as one of the main values on which they base their business activities, prior to the disclosure of any personal data **Essenza** invites you to read this privacy policy carefully which contains important information relating to the protection of personal data and the security measures taken to ensure confidentiality in full compliance with current legislation.

This privacy policy has been drawn up pursuant to article 13 of the EU Regulation 2016/679 (“GDPR”), by **Essenza**, in relation to:

- *Acquiring or using Essenza products;*
- *Contacts with Essenza for information or support through channels of assistance for customers and users;*
- *Subscribing to the newsletter or other services promoted by Essenza;*
- *Using the Essenza company web site ;*
- *Participating in promotional or advertising or public events and/or trade fairs;*
- *Sending documents and personal data containing confidential information;*
- *Recruitment activities;*

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Essenza, hereby states that the processing of personal data will be based on principles of lawfulness, fairness, transparency, purpose limitation and retention, minimisation of data accuracy, integrity and confidentiality and will therefore be processed in compliance with the principles of the GDPR and the confidentiality requirements provided for in the same.

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1) **METHODS OF COLLECTING PERSONAL DATA:**

In compliance with current legislation relating to “*personal data*” any information relating to an identified or identifiable natural person with particular reference to details such as names, identification number, data relating to location, on-line data or one or more characteristic elements of their physical, physiological, mental, economic, cultural or social identity. In certain situations (for example when a curriculum vitae is sent) so-called “particular” data that reveals the state of health, political and religious affiliations is collected.

The “*personal and particular data*” collected by the web site is as follows:

a) *Contact data to send documents and personal data and material containing confidential information*

In order to verify the requirements to participate in selection aimed at recruitment, users are required to supply personal data sometimes of a particular nature.

Receipt of a curriculum vitae may occur as a result of spontaneous sending or in response to a recruitment ad published by Essenza S.r.l.

Further information may be collected subsequently from interested parties during interviews.

- 1) If the curriculum vitae arrives in response to a recruitment ad published by Essenza S.r.l.

Only the candidates who meet the requirements will be invited for an evaluation interview by Essenza S.r.l.

Data relating to the candidates interviewed or considered to be of interest even for future opportunities can be processed by Essenza S.r.l. with the prior consent of interested parties which will be given simultaneously when the curriculum is sent or delivered.

Personal data can be stored in the Essenza S.r.l. archive both in paper and electronic form by people authorised to perform this function: this data will be stored for 12 months.

After this time it will be destroyed.

2) If the personal data is supplied spontaneously, i.e. not in response to any ad or announcement, and in the event the application is of no interest to the company the Curriculum received will be destroyed immediately.

On the other hand if Essenza S.r.l. is interested the office responsible for assessing candidates must provide interested parties when they first make contact with the same with the privacy policy in accordance with article 13 of Regulation 2016/679 and obtain their consent to processing personal data for the purposes outlined above. Maximum retention time of CVs of interest to the company is 12 months from the date of receipt. After this time they will be destroyed.

b) Contact data

To collect information relating to quality control, marketing, business surveys, statistical surveys, sales, requests for after-sales service from customers and users and in general any information relating to the activity of Essenza.

Data collected for marketing purposes and business surveys will be deemed valid until a unsubscribe request from users is received which is possible to do with every e-mail and/or communication sent by Essenza S.r.l. If the transmission frequency of these communications is low a verification e-mail containing the unsubscribe link will be sent to all users at least once every six months.

Data sent via the web site for requests for sales and/or after-sales service entail the subsequent acquisition of the sender's address, necessary to answer the request, as well as any other personal data included in the e-mail. This data will be stored for the time required to process the requests received. Once this has been achieved the data will be anonymised or cancelled unless it is necessary to store it for any other purposes provided for expressly by law (for example for storage purposes).

c) Navigation data

The web site web-server acquires some personal data whose transmission is an inherent feature of Internet communication protocols. This information is not collected in order to relate it to data subjects but because of its very nature, it might allow user identification after being processed and matched with data held by third parties. The described data includes:

- IP addresses
- domain names of the computers used to connect to the web site
- the URI addresses (Uniform Resource Identifier) of requested resources
- the time and date of navigation
- the method used to submit the request to the server
- the size of the file obtained as a response
- the numerical code indicating the state of the response given by the server (successful, error, etc.)
- other parameters relating to the operating system and to users' information technology environment.

This data is used solely for the purpose of obtaining anonymous statistical data about the use of the site and to check its correct operation as well as to ensure the proper delivery of the various features requested. For security reasons to establish liability in case of hypothetical crimes against the site or third parties and will be cancelled after 180 days.

d) Cookies and similar technology

Essenza collects personal data using cookies, further information on their use can be obtained by downloading the information contained at the following url [http://\[.\]](http://[.])

2) **PURPOSES, LEGAL BASIS AND MANDATORY OR OPTIONAL NATURE OF PROCESSING**

The type of personal data and methods of collecting the same depends on the products acquired and the services requested as well as the method of interaction with Essenza, even if it is not a direct customer but a final consumer.

Types of personal data processing for which express consent is not required (article 6 letters. b) and e) of the GDPR):

- a) to draw up and execute a contract and all activities connected to it such as for example invoicing, credit protection, administrative, managerial, organisational and functional performance of the contract;
- b) to answer requests to Essenza for information or support using the channels of assistance to customers and users;
- c) to improve the quality of their services and products;
- d) to provide other services in compliance with the execution of the contract;

Types of personal data processing for which express consent is required (article 7 of the GDPR):

- e) carrying out marketing and promotional activities on products and services of the Data Controller, commercial communications either using automatic means without the intervention of an operator (e.g. SMS, fax, mms, e-mail, web banners, push notifications etc.) as well as traditional means (by telephone or via regular mail)
- f) carrying out fundraising activities or cultural, social or charitable initiatives;
- g) initiatives and offers as well as programmes and promotions that involve invitations to events and participation in surveys;
- h) carrying out market research;

This consent relates to both the automated and traditional communication methods described above. Users will always have the right to object easily and freely in whole or in part to the processing of their personal data for the above mentioned purposes, excluding for example the automated contact mode and express their wish to receive commercial and promotional communications only through traditional contact methods .

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Processing of personal data is carried out using the operations indicated in article 2 no. of the 2) GDPR, for the purposes set out above both in paper form as well as computer by electronic means or automated tools, in compliance with current legislation in particular on matters relating to confidentiality and security in accordance with the principles of fairness, legality, transparency and the protection of Customer rights. Processing is carried out directly by the Data Controller, by their data supervisors and/or people in charge of processing as defined above.

The data required for the purposes indicated in letters a), b), c), d) must be provided in order to fulfil legal obligations and/or the conclusion and execution of the contractual relationship and to provide the requested services. Therefore, refusal to provide such data, even partial would mean Essenza would be unable to establish and manage the said relationship and supply the requested services.

Providing the personal data indicated in letters e) and f) is optional therefore refusal to provide such data would mean it would be impossible to carry out the activities described.

3) RECIPIENTS

The subjects to whom **Essenza** will disclose the data act as external data supervisors appointed by the “data controller” via a special contract (“**Data Supervisor**”) or by persons authorised to process personal data under the direct authority of Essenza (“**Persons in Charge of Processing**”) i.e. in the case of third parties the Data Controller engages “**Sub-Data Controllers**”, in accordance with article 28.4 of the GDPR.

Personal data can be disclosed by **Essenza** to the following categories of recipients:

- third parties to whom the data must be disclosed to in order to fulfil legal obligations;
- companies in the group **Essenza** belongs to and/or partners of **Essenza**, for activities relating to administration, accounting, marketing, IT, logistic support and HR;
- companies, consultants or professionals appointed to install, maintain, update and in general manage hardware and software;
- companies that carry out logistic support and/or warehouse and/or packaging and/or shipping and delivery;
- all those subjects, including public authorities that have access to the data due to legislative or administrative measures;

- all those public and/or private subjects, natural and/or legal persons (legal, administrative and tax firms), if disclosure is necessary or functional to fulfil legal obligations or in the event of establishment, exercise or defence of a right.

A complete list of recipients can be requested from **Essenza**.

4) **DATA TRANSFER**

The personal data is stored on servers located inside the European Union. It is in any case understood that the Controller will also have the right to transfer the servers outside the EU if considered necessary. In this case the Controller here and now ensures that the transfer of data outside the EU will be done in compliance with applicable laws after concluding the standard contractual laws provided for by the European Commission. Similarly the place of execution of the processing and storage of data processed in paper form or alternatively via computer is located in Italy.

5) **DATA RETENTION**

Essenza will process your personal data for the time strictly necessary to achieve the purposes set out in point 2 and until the time permitted by Italian law to protect their interests (Article 2947 (1) (3) of the Italian Civil Code).

6) **USER RIGHTS**

Within the limits set out by the GDPR, users have the right to ask **Essenza** at any time to access their personal data, correct or cancel the same or to object to processing, to withdraw individual consent provided, to limit processing as well as to obtain the data that concerns them in a structured format, commonly used and read by automatic data devices.

Requests must be sent to the following-mail address: essenzalucana@legalmail.it

Pursuant to the GDPR, users have the right to submit a complaint to the competent supervisory authority (The Italian Data Protection Authority) if they believe that the processing of personal data is contrary to applicable law.

7) **MODIFICATIONS**

This privacy policy was updated on **25/5/2018**. **Essenza** reserves the right to modify or simply update the content, in part or completely, also because of changes in applicable law. **Essenza** will inform users of such changes and therefore invites users to visit this section regularly to take cognizance of the most recent and updated version of the Privacy Policy so that they are always updated on the data collected and how **Essenza** uses the same.