PRIVACY NOTICE REGARDING THE PROCESSING OF PERSONAL DATA PURSUANT TO ARTICLE 13 OF REGULATION (EU) 2016/679 ("GDPR")

FOR INTERESTED PARTIES:
Clients and website users

	DATA CONTROLLER **Valter Franco Ricci S.p.A.**	VAT number: 00150300069 Registered Office: Corso Roma 144 - 15121, Alessandria (AL) Tel. +39 011 5613589 E-mail: privacy@astrua.com

	SUBJECT OF THE PROCESSING
	The Data Controller processes the Data Subject's identifying data using electronic and paper-based means (including, by way of example, **first name, last name, date and place of birth, country, tax identification number, identity document details, residential address, telephone number, e-mail address, city and province of domicile, hobbies and interests of the Data Subject, data relating to the opening of e-mail communications and interactions with them, etc.**) – hereinafter referred to as "personal data" or "Data" – within the limits of the purposes and methods described in this Privacy Policy.

PURPOSES OF THE PROCESSING	**LEGAL BASIS FOR PROCESSING**	**DATA RETENTION PERIOD**
I. CLIENTS AND POTENTIAL CLIENTS		
a. Invoicing and management of the contractual and pre-contractual relationship with the Client	The processing is necessary for the performance of a contract to which the Data Subject is a party or for the implementation of pre-contractual measures taken at their request.	Personal data will be retained for the time necessary to achieve the purposes indicated in this Privacy Notice. The Data Controller will retain, for ten years as required by the Civil Code, copies of

b. Compliance with legal obligations related to contractual and commercial relationships	The processing is necessary to comply with a legal obligation to which the Data Controller is subject.	correspondence with legal and commercial relevance. The Data Subject's personal data may also be kept for the time necessary to ensure the defense in legal proceedings.
c. Compliance with tax or accounting obligations		
d. Exercising the rights of the Data Controller (for example, the right to defense in legal proceedings)	The legal basis is the legitimate interest of the Data Controller, namely to exercise the rights of the Controller, such as the defense in legal proceedings.	
Providing the Data for the above-mentioned purposes is mandatory. Failure to provide the Data, in whole or in part, may result in the partial or total impossibility of establishing or continuing the relationship with the Data Subject, to the extent that such Data is necessary for its execution.		
e. Marketing Purposes: Sending the Data Subject promotional communications containing commercial offers, advertising materials (for example, but not limited to, magazines or other advertising materials), newsletters, etc., through automated contact methods (e.g., SMS, e-mail, and instant messaging) and traditional methods (e.g., phone calls with an operator and regular mail).	The legal basis is the consent of the Data Subject.	Data collected for marketing and profiling purposes, as well as data collected through tracking pixels, will be retained until the Data Subject withdraws their consent, and in any case for a period not exceeding **10 years** from the date of data collection. Once the aforementioned retention period has expired, personal data will be **deleted or pseudonymized**, except where exceptionally necessary to retain such data to protect the rights of Valter Franco Ricci S.p.A. in connection with ongoing disputes.
f. Profiling: Data directly collected from the Data Subject is processed by the Data Controller to create a Client profile based on their preferences, habits, interests, behaviors, purchased products, and responses to market research, in order to improve the commercial offer and send	The legal basis is the consent of the Data Subject.	

commercial proposals aligned with the Data Subject's preferences.		
g. Open Tracking (Tracking Pixels): to detect, through tracking pixels (tiny images invisible to the recipient and embedded in the message), whether and when the Data Subject opens promotional communications received via e-mail and whether they interact with the links contained therein, in order to measure the effectiveness of individual e-mail campaigns and adjust their content and frequency accordingly.	The legal basis for processing is the Data Subject's consent (Article 122 of the Italian Privacy Code and Article 6(1)(a) of the GDPR).	

Providing Data for Marketing and Profiling Purposes is **voluntary and optional**. You may choose not to provide any data or subsequently refuse the processing of Data already provided. You can withdraw your consent to the processing of Data at any time without affecting the lawfulness of processing based on consent before its withdrawal, by following the instructions at the bottom of each newsletter and commercial communication, or by sending a message to the e-mail address. privacy@astrua.com.

The tracking pixel is embedded exclusively in promotional communications sent via e-mail to Data Subjects who have consented to Marketing Purposes. When the message is opened, it allows the detection of whether the e-mail has been opened, the date and time of opening, the number of times it has been opened, the IP address, the type of device and the e-mail client used. Clicks on links contained in the message may also be tracked. The tracking pixel does not provide access to the contents of the Data Subject's e-mail inbox. This information is collected and managed through the HubSpot platform (see the "Data Transfers" section) and, if the Data Subject has also given consent to Profiling, may contribute to the creation of their profile.

Consent to tracking is requested together with consent to receive promotional communications but may be withdrawn at any time, independently of the latter. Through the preference management link provided at the bottom of each communication, the Data Subject may choose to continue receiving communications **without being tracked** or to **unsubscribe entirely**. Consent may also be withdrawn by sending an e-mail to privacy@astrua.com. Withdrawal of consent does not affect the lawfulness of processing carried out prior to withdrawal and, where it concerns tracking only, does not affect the receipt of promotional communications.

Data Subjects who had already consented to receiving promotional communications prior to the update of this Privacy Policy will be informed of the use of tracking pixels in the next available communication, together

with instructions on how to disable tracking using the methods described above. Unless consent is withdrawn, tracking will continue under the conditions set out herein.		
Please note that, if you purchase products from the Data Controller's stores, we may send you commercial communications regarding the Controller's services and products similar to those you have already used, unless you exercise your opt-out rights (Art. 130, paragraph 4 of the Privacy Code).		
II. WEBSITE USER HTTPS://ASTRUA.COM/		
PURPOSES OF THE PROCESSING	**LEGAL BASIS FOR THE PROCESSING**	**DATA RETENTION PERIOD**
a. Allow the User to send messages to the Data Controller – by interacting through specific contact forms and chat features available on the Website.	The processing is necessary for the performance of a contract to which the Data Subject is a party, or for the implementation of pre-contractual measures taken at their request.	In the event of a request for contact or information, the Data will be retained for a period of 36 months, exclusively with regard to Data that has no legal or commercial relevance and in cases where consent for marketing and profiling purposes has not been given. After this period, the Data will be deleted.
b. Allow the User to register (by creating their own profile) on the Website, access it, and interact with its contents (e.g., My Repairs).		With regard to the deletion of Data of Data Subjects registered on the Data Controller's Website, personal Data will be deleted after the Data Subject's personal account is deleted, upon a specific request from the Data Subject, or after 36 months from the Data Subject's last interaction with the Website in cases where consent for marketing and profiling purposes has not been given.

c. Manage the process of selling products through the Website.		Personal data will be retained for as long as necessary to fulfill the purposes indicated in this privacy notice. The Data Controller will keep a copy of correspondence with legal and commercial relevance for ten years, as required by the Civil Code. The Data Subject's personal data may also be retained for as long as necessary to ensure defense in legal proceedings or to address any misuse of the Data Controller's Website.
d. Fulfill contractual obligations.		
e. Comply with legal obligations.	The legal basis is the compliance with legal obligations.	
f. Exercise the rights of the Data Controller (e.g., the right to defend itself in legal proceedings).	The legal basis is the legitimate interest of the Data Controller, namely to monitor the proper functioning of the Website and to exercise the Data Controller's rights, such as the right to defend itself in legal proceedings.	
g. Collect statistics and metrics aimed at ensuring the proper functioning of the Website.		For more information on the retention period of data collected through cookies, it is recommended to consult the cookie policy: https://astrua.com/en/cookie-policy.
Providing data for the purposes listed above is mandatory. If the Data is not provided, it will not be possible for you to interact properly with the Website, send messages to the Data Controller, or make purchases.		
h. **Marketing purposes:** Send the Data Subject promotional communications containing commercial offers, advertising materials (for example, but not limited to, magazines or other advertising materials), newsletters, etc., through automated contact methods (e.g., SMS, email, and instant messaging) and traditional methods (e.g., calls with an	The legal basis is the consent of the Data Subject.	Data collected for marketing and profiling purposes, as well as data collected through tracking pixels, will be retained until the Data Subject withdraws their consent, and in any case for a period not exceeding **10 years** from the date of data collection. Once the aforementioned retention period has expired, personal data will be **deleted or pseudonymized**, except where exceptionally necessary to retain such data to protect the rights of

operator and regular mail).		Valter Franco Ricci S.p.A. in connection with ongoing disputes.
i. Profiling: Data directly collected from the Data Subject is processed by the Data Controller to create a Customer profile based on their preferences, habits, interests, behaviors, purchased products, and responses to market surveys, with the purpose of improving the commercial offer and sending commercial proposals aligned with the Data Subject's preferences.	The legal basis is the consent of the Data Subject.	
j. Open Tracking (Tracking Pixels): to detect, through tracking pixels (tiny images invisible to the recipient and embedded in the message), whether and when the Data Subject opens promotional communications received via e-mail and whether they interact with the links contained therein, in order to measure the effectiveness of individual e-mail communications and adjust their content and frequency accordingly.	The legal basis for processing is the Data Subject's consent (Article 122 of the Italian Privacy Code and Article 6(1)(a) of the GDPR).	
Providing Data for Marketing and Profiling purposes is voluntary and optional. You may therefore choose not to provide any data or later deny the processing of Data already provided. You can withdraw your consent to Data processing at any time without affecting the lawfulness of processing based on consent before its		

withdrawal, by following the instructions provided at the bottom of each newsletter and commercial communication, or by sending a message to the email address privacy@astrua.com.

The tracking pixel is embedded exclusively in promotional communications sent via e-mail to Data Subjects who have consented to Marketing Purposes. When the message is opened, it allows the detection of whether the e-mail has been opened, the date and time of opening, the number of times it has been opened, the IP address, the type of device and the e-mail client used. Clicks on links contained in the message may also be tracked. The tracking pixel does not provide access to the contents of the Data Subject's e-mail inbox. This information is collected and managed through the HubSpot platform (see the "Data Transfers" section) and, if the Data Subject has also given consent to Profiling, may contribute to the creation of their profile.

Consent to tracking is requested together with consent to receive promotional communications but may be withdrawn at any time, independently of the latter. Through the preference management link provided at the bottom of each communication, the Data Subject may choose to continue receiving communications **without being tracked** or to **unsubscribe entirely**. Consent may also be withdrawn by sending an e-mail to privacy@astrua.com. Withdrawal of consent does not affect the lawfulness of processing carried out prior to withdrawal and, where it concerns tracking only, does not affect the receipt of promotional communications.

Data Subjects who had already consented to receiving promotional communications prior to the update of this Privacy Policy will be informed of the use of tracking pixels in the next available communication, together with instructions on how to disable tracking using the methods described above. Unless consent is withdrawn, tracking will continue under the conditions set out herein.

Service communications relating to purchases made on the Website (such as order confirmations and shipping updates) and account management do not contain individual tracking pixels, except where confirmation that a message has been opened is necessary for security reasons, such as during password recovery procedures, or to document the receipt of communications that the Data Controller is legally required to send.

Please note that, if you purchase products at the Data Controller's stores, we may send you commercial communications regarding the Data Controller's services and products similar to those you have already used, unless you exercise the opt-out (Art. 130, paragraph 4, Privacy Code).

By interacting with the Website, your personal data may be processed through the use of cookies. Full details on the cookies used and the retention period of personal data processed through cookies are provided in the cookie policy: https://astrua.com/en/cookie-policy.

	**DATA SHARING** The Data of the Data Subject will not be disclosed publicly but may be made accessible, where necessary for the provision of services or by law, to: • employees and collaborators of the Data Controller in Italy and abroad, in their capacity as persons authorized to process personal data and/or system administrators; • third-party companies or other entities (for example, banks and credit institutions, consultants and freelance professionals, including in associations, public authorities to whom Data disclosure is mandatory, administrative and accounting service providers, IT service providers, etc.) that perform activities outsourced on behalf of the Data Controller, in their capacity as external data processors. More generally, in the course of its ordinary business activities, Data may be communicated to entities performing control, auditing, and certification activities of the operations carried out by the Data Controller, consultants and freelance professionals in the context of tax, legal, and corporate advisory services when it is necessary to assess company assets, public authorities and administrations, as well as entities legally entitled to receive such information, Italian and foreign judicial authorities, and other public authorities, for purposes related to compliance with legal obligations or the fulfillment of obligations arising from the contractual relationship, including for the purpose of legal defense.

	DATA TRANSFER Personal data is stored on servers located within the European Union, managed by third-party companies duly appointed as Data Processors. The Data Controller may transfer certain categories of the Data Subject's data to countries outside the European Union. Data will be transferred exclusively to countries deemed adequate by the European Commission or to companies that provide safeguards in accordance with Articles 44–50 of the GDPR.

	The Data Controller uses the services provided by HubSpot, Inc., including the creation of data collection forms and the sending of newsletters, as well as tracking the opening of e-mail communications and interactions with them. The aforementioned company will process the Data Subjects' personal data in compliance with the Standard Contractual Clauses for the transfer of personal data to third countries adopted by the European Commission (see the Privacy Policy at https://legal.hubspot.com/privacy-policy). For further information, you may contact the service provider directly: HubSpot, Inc., 25 First Street, 2nd Floor, Cambridge, MA 02141, USA.

	DATA SUBJECT'S RIGHTS By contacting Valter Franco Ricci S.p.A. via email at privacy@astrua.com or by sending a registered letter with return receipt to Valter Franco Ricci S.p.A., with registered office at Corso Roma 144 - 15121, Alessandria (AL), the Data Subject may exercise, in relation to the processing of data described in this Privacy Notice, the rights provided by the GDPR (Articles 15-22), including: • to obtain confirmation of the existence of the Data and access its content (right of access); • to update, modify, and/or correct the Data (right to rectification); • to request the deletion or restriction of processing of Data processed in violation of the law, including those not required to be retained for the purposes for which the Data was collected or otherwise processed (right to erasure and right to restriction); • to object to processing (right to object); • to lodge a complaint with the Supervisory Authority (Italian Data Protection Authority – www.garanteprivacy.it) in case of violation of data protection regulations;

	• to receive a copy of the Data concerning them in electronic format when such Data has been provided in the context of a contract and to request that such Data be transmitted to another Data Controller (right to data portability)."
When contacting us, the Data Subject must ensure to include their name, email/postal address, and/or phone number(s) to ensure that their request can be processed correctly.	

	**CONTACT DETAILS OF THE DATA CONTROLLER**
	The Data Controller is: **Valter Franco Ricci S.p.A.** VAT number: **00150300069** Registered office: **Corso Roma 144 - 15121, Alessandria (AL)** Tel.: **+39 011 5613589** E-mail**: privacy@astrua.com**