








**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

	<p>DATA CONTROLLER</p> <p>Valter Franco Ricci S.p.A.</p>	<p>VAT number: 00150300069</p> <p>Registered Office: Corso Roma 144 - 15121, Alessandria (AL)</p> <p>Tel. +39 011 5613589</p> <p>E-mail: privacy@astrua.com</p>
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	<p>SUBJECT OF THE PROCESSING</p> <p>The Data Controller processes the Data Subject’s identifying information using electronic and paper-based tools (including, by way of example, first name, last name, date and place of birth, country, tax code, identity document details, residential address, telephone number, e-mail address, city and province of domicile, hobbies and interests of the Data Subject, etc.) — hereinafter referred to as “personal data” or simply “Data” — within the limits of the purposes and methods described in this Privacy Notice.</p>
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 PURPOSES OF THE PROCESSING	 LEGAL BASIS FOR PROCESSING	 DATA RETENTION PERIOD
I. CLIENTS AND POTENTIAL CLIENTS		
<p>a. Invoicing and management of the contractual and pre-contractual relationship with the Client</p>	<p>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.</p>	<p>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</p>

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		years as required by the Civil Code, copies of 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.
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.	
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 will be retained until the Data Subject withdraws consent, and in any case for a period not exceeding 10 years from the time the data was collected. After the retention period indicated above, personal data will be deleted or pseudonymized , except in the exceptional case where it is necessary to retain the data to defend the rights of Valter Franco Ricci S.p.A. in relation to ongoing disputes.
f. Profiling: Data directly collected from the Data Subject is processed by the Data Controller to create a Client profile based on	The legal basis is the consent of the Data Subject.	

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<p>their preferences, habits, interests, behaviors, purchased products, and responses to market research, in order to improve the commercial offer and send commercial proposals aligned with the Data Subject's preferences.</p>		
<p>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.</p>		
<p>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).</p>		
<p>II. WEBSITE USER HTTPS://ASTRUA.COM/</p>		
 PURPOSES OF THE PROCESSING	 LEGAL BASIS FOR THE PROCESSING	 DATA RETENTION PERIOD
<p>a. Allow the User to send messages to the Data Controller – by interacting through specific contact forms and chat features available on the Website.</p>	<p>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.</p>	<p>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.</p>

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<p>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).</p>		<p>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.</p>
<p>c. Manage the process of selling products through the Website.</p>		<p>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.</p>
<p>d. Fulfill contractual obligations.</p>		
<p>e. Comply with legal obligations.</p>	<p>The legal basis is the compliance with legal obligations.</p>	
<p>f. Exercise the rights of the Data Controller (e.g., the right to defend itself in legal proceedings).</p>	<p>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.</p>	<p>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.</p>
<p>g. Collect statistics and metrics aimed at ensuring the proper functioning of the Website.</p>		

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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.

<p>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 operator and regular mail).</p>	<p>The legal basis is the consent of the Data Subject.</p>	<p>Data collected for marketing and profiling purposes will be retained until the Data Subject withdraws consent, and in any case for a period not exceeding 10 years from the date of data collection. After the retention period indicated above, personal data will be deleted or pseudonymized, except in cases where it is exceptionally necessary to retain the data to defend the rights of Valter Franco Ricci S.p.A. in relation to ongoing disputes.</p>
<p>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.</p>	<p>The legal basis is the consent of the Data Subject.</p>	

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

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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.

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

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	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.
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	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 services provided by the platform HubSpot, Inc., such as the creation of data collection forms and the sending of newsletters. This company will process the Data Subjects' data in compliance with the Standard Contractual Clauses for the transfer of personal data to third countries adopted by the European Commission (see information at the link https://legal.hubspot.com/privacy-policy). For further information, you can contact the provider directly: HubSpot, Inc., 25 First Street, 2nd Floor, Cambridge, MA 02141, USA.

	DIRITTI DELL'INTERESSATO 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
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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**

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