

DISCLOSURE
IN THE FIELD OF PROTECTION OF PERSONAL DATA PURSUANT TO ART. 12 and ss. EU
REGULATION 679/2016

Pursuant to the new EU Regulation 679/2016, in accordance with the principle of accountability any processing of personal data must be lawful and correct. The manner in which the personal data concerning him is collected, consulted or otherwise treated, as well as the extent to which the same data is or will be treated must be transparent to individuals.

The principle of transparency requires that information and communications relating to the processing of such data are easily accessible and comprehensible and that simple and clear language is used.

This principle concerns, in particular, the information of the interested parties on the identity of the Data Controller and the purposes of the processing and additional information (see Articles 13 and 14 of EU Regulation 679/2016) to ensure correct and transparent treatment with regard to the natural persons concerned and their rights to obtain confirmation and communication of the processing of personal data concerning them (on the point of see Recital 39, EU Regulation 679/2016).

With this in mind, please read the following information.

Stella Srl based in Via Roma, 34 - Montecarlo - Lucca - Italy,

VAT number 02383430465

address pec stellasrl2015@pec.it email address: privacy@ruedesmille.com and

New Gold Srl with registered office in Via dei Mille, 99 - La Spezia - Italy,

VAT number 00293480117, Tel./Fax 0583.22050

pec address newgold srl@pec.it - email address: privacy@ruedesmille.com,

acting as data controllers pursuant to and for the effects of EU Regulation 2016/679 , hereby inform the interested party that the personal data assumed concerning him, acquired by the Co-owner or that will be requested later and / or communicated by third parties, will be used for the purposes indicated below.

PURPOSE AND LICENSE OF TREATMENT

Pursuant to EU Regulation 679/2016, personal data:

- They are treated in a lawful, correct and transparent way towards the interested party (Article 5);
- The same are collected for specific, explicit and legitimate purposes, and subsequently processed in a way that is not incompatible with these purposes (Article 5);

The purposes for which the data are collected are as follows:

- comply with any legal obligations related to civil, fiscal, accounting, etc. for the purposes of administrative management of the relationship you may have established with Stella Srl or New Gold Srl as well as for our legal protection;
- fulfill contractual obligations, delivery / return of goods, technical support and technical information, after-sales assistance and verification of satisfaction with the products of interest to you;
- to satisfy market and statistical inquiries to carry out marketing, to send offers, with regard to products subject to the activity of Stella Srl or New Gold Srl;
- for the communication / forwarding of commercial information on initiatives, product announcements, services and offers, brochures, by Stella Srl or New Gold Srl by sending e-mails, newsletters, text messages and even paper by mail.

PROCESSING METHOD AND CONFIDENTIALITY OBLIGATION

The processing of data is performed through computer tools and / or paper, by persons committed to confidentiality, with logic related to the purposes and in any way to ensure the security and confidentiality of data. They will be the subject of automated treatment through software, management and other programs that help us in the treatment and execution of the activities listed above including marketing.

COMMUNICATION TO THIRD PARTIES

Your personal data may be disclosed to third parties known to us only and exclusively for the aforementioned purposes and, in particular, to the following categories of subjects:

- External companies that perform services on our behalf;
- Entities and Public Administrations for legal obligations;
- Professionals who can support the fulfillment;
- Providers of services / products, for example, to process credit card and payment data, shipments, deliveries, hosts, to manage data, to forward e-mails, to manage product promotion, for research and analysis, as well as administer certain services;

When we communicate data to third parties we enter into agreements that require them to ensure that they take technical and organizational measures to protect personal data. These subjects will process personal data as external managers.

STORAGE TIME

Pursuant to art. 5 of EU Regulation 679/2016, "*Principles relating to processing of personal data*", personal data are stored in a form that allows identification of data subjects for a period of time not exceeding the achievement of the purposes for which they are processed.

The personal data of the interested parties may also be kept for longer periods in compliance with the requirements relating to the laws in force (by way of example regarding accounting) and, in any case, applying every technical-organizational measure suitable to activate mechanisms of anonymization of the data .

The data will be stored for a period of time not exceeding the achievement of the purposes and interests for which they are processed and will be promptly deleted at the request simply by writing to privacy@ruedesmille.com

RIGHTS OF THE INTERESTED PARTY

Pursuant to current legislation, the interested party may assert their rights to each of the data processing contractors (also using the downloadable template [Http://ruedesmille.com/unsubscribe.pdf](http://ruedesmille.com/unsubscribe.pdf)), as expressed in EU Regulation 679/2016, ie :

Right of access by the data subject

Art. 15

1. The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information:
 1. the purposes of the processing;
 2. the categories of personal data concerned;
 3. the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;

4. where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
 5. the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
 6. the right to lodge a complaint with a supervisory authority;
 7. where the personal data are not collected from the data subject, any available information as to their source;
 8. the existence of automated decision-making, including profiling, referred to in [Article 22](#)(1) and (4) and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.
2. Where personal data are transferred to a third country or to an international organisation, the data subject shall have the right to be informed of the appropriate safeguards pursuant to [Article 46](#) relating to the transfer.
 3. ¹The controller shall provide a copy of the personal data undergoing processing. ²For any further copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs. ³Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form.
 4. The right to obtain a copy referred to in paragraph 3 shall not adversely affect the rights and freedoms of others.

RIGHT TO RECTIFICATION

art. 16

The data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. ²Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

Right to erasure ('right to be forgotten')

Art. 17

1. The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies:
 1. the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
 2. the data subject withdraws consent on which the processing is based according to point (a) of [Article 6](#)(1), or point (a) of [Article 9](#)(2), and where there is no other legal ground for the processing;
 3. the data subject objects to the processing pursuant to [Article 21](#)(1) and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to [Article 21](#)(2);
 4. the personal data have been unlawfully processed;
 5. the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject;

6. the personal data have been collected in relation to the offer of information society services referred to in [Article 8\(1\)](#).
2. Where the controller has made the personal data public and is obliged pursuant to paragraph 1 to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers which are processing the personal data that the data subject has requested the erasure by such controllers of any links to, or copy or replication of, those personal data.
3. Paragraphs 1 and 2 shall not apply to the extent that processing is necessary:
 1. for exercising the right of freedom of expression and information;
 2. for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
 3. for reasons of public interest in the area of public health in accordance with points (h) and (i) of [Article 9\(2\)](#) as well as [Article 9\(3\)](#);
 4. for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with [Article 89\(1\)](#) in so far as the right referred to in paragraph 1 is likely to render impossible or seriously impair the achievement of the objectives of that processing; or
 5. for the establishment, exercise or defence of legal claims.

Right to restriction of processing

Art.18

1. The data subject shall have the right to obtain from the controller restriction of processing where one of the following applies:
 1. the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
 2. the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
 3. the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
 4. the data subject has objected to processing pursuant to [Article 21\(1\)](#) pending the verification whether the legitimate grounds of the controller override those of the data subject.
2. Where processing has been restricted under paragraph 1, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.
3. A data subject who has obtained restriction of processing pursuant to paragraph 1 shall be informed by the controller before the restriction of processing is lifted.

Right to data portability

Art.20

1. The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where:
 1. the processing is based on consent pursuant to point (a) of [Article 6\(1\)](#) or point (a) of [Article 9\(2\)](#) or on a contract pursuant to point (b) of [Article 6\(1\)](#); and
 2. the processing is carried out by automated means.
2. In exercising his or her right to data portability pursuant to paragraph 1, the data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.
3. ¹The exercise of the right referred to in paragraph 1 of this Article shall be without prejudice to [Article 17](#). ²That right shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.
4. The right referred to in paragraph 1 shall not adversely affect the rights and freedoms of others.

Right to object

Art. 21

1. ¹The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on point (e) or (f) of [Article 6\(1\)](#), including profiling based on those provisions. ²The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.
2. Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing.
3. Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.
4. At the latest at the time of the first communication with the data subject, the right referred to in paragraphs 1 and 2 shall be explicitly brought to the attention of the data subject and shall be presented clearly and separately from any other information.
5. In the context of the use of information society services, and notwithstanding [Directive 2002/58/EC](#), the data subject may exercise his or her right to object by automated means using technical specifications.
6. Where personal data are processed for scientific or historical research purposes or statistical purposes pursuant to [Article 89\(1\)](#), the data subject, on grounds relating to his or her particular situation, shall have the right to object to processing of personal data concerning him or her, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

In addition to the aforementioned rights, the interested party has the right to revoke the consent upon an appropriate request, as well as to lodge a complaint with the Supervisory Authority for the

protection of personal data - website: www.garanteprivacy.it - email address: [guarantor @ gdpd .com](mailto:guarantor@gdpd.com).

CO-OWNER OF DATA AND PRIVACY COMMUNICATIONS

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FOR FURTHER INFORMATION also in relation to the methods of exercising these rights and any communication we are at your disposal.

Tel./Fax 0583.22050

Email address: privacy@ruedesmille.com