

## **INFORMATION ON DATA PROCESSING ARTICLES. 13 AND 14 OF REGULATION (EU) 2016/679**

Data Subjects: Customers

**Dear Customer,**

**“ATL GROUP SPA”**, as the licensee of the brand “LIU JO Living” and owner of the processing of your personal data, pursuant to Regulation (EU) 2016/679 hereinafter ‘GDPR’, hereby informs you that the aforementioned legislation provides for the protection of data subjects with regard to the processing of personal data and that such processing will be based on principles of correctness, lawfulness, transparency and protection of your privacy and your rights. In order to carry out its purposes, relating to the management of the relationship, the Controller needs to acquire personal data, such as for example, your name and surname, telephone or mobile phone number, address, email address, tax code/VAT number, and other data or information on the type of service requested, only if necessary for the purposes indicated.

Your personal data will be processed in accordance with the legal provisions of the aforementioned legislation and the confidentiality obligations provided therein.

**Purposes and legal basis of the processing:** in particular, your data will be processed for the following purposes:

- Tax and accounting obligations; legal basis: legal obligation;
- Management of any electronic payments; legal basis: legal obligation;
- Management of product warranty procedures; legal basis: contractual obligation and legal obligation;
- Management of logistics for transport and delivery of purchased products; legal basis: contractual obligation;
- Management and response to any reports, inquiries and complaints forwarded by the Customer (Customer Care); legal basis: contractual obligation;
- Obligations under applicable laws; legal basis: legal obligation;

**Consequences of non-communication:** the processing of data is necessary in response to the customer’s request for the purposes indicated; failure to communicate, or incorrect communication, of any of the mandatory information may make it impossible for the Controller to guarantee the services requested.

**Optional purposes:** Marketing - newsletter reception service: subscription to the newsletter takes place through the provision of your free consent on the website [www.liujoliving.com](http://www.liujoliving.com), which can also be reached through the framing of dedicated QR Codes located inside the point of sale. Further information regarding the newsletter reception service is provided in specific information documents that supplement this one available at [www.liujoliving.com](http://www.liujoliving.com).

**Consequences of refusal to provide optional data:** The provision of data is optional for you with regard to the above-mentioned purposes, and your refusal to provide such data will not compromise the continuation of the relationship or the appropriateness of the processing itself.

**Method of processing:** The processing is carried out using manual and/or computerised and telematic instruments, in such a way as to guarantee the security, integrity and confidentiality of the data in compliance with the physical and logical organisational measures provided for by the provisions in force, so as to minimise the risks of destruction or loss, unauthorised access, modification and unauthorised disclosure in compliance with the methods referred to in Articles 5, 32 of the GDPR.

**Recipients:** In order to carry out certain activities, or to provide support for the operation and organisation of the business, certain data may be brought to the attention of or communicated to recipients. These recipients are distinguished in:

**Third parties:** (communication to: natural or legal persons, public authorities, service or other body other than the data subject, data controller, data processor and authorised persons responsible for processing) including:

- Banking institutions for the management of collections and payments;
- Financial companies, in the event of financing requested by the Customer at the time of purchase;
- Companies that manage traditional or computerised postal services (if necessary for the financial purposes indicated);
- Consultants and freelancers, also in associated form in legal matters, etc., in their capacity as autonomous owners;
- Subjects/Bodies whose right to access your data is recognised by legal obligation;

**Data controllers:** (the natural or legal person, public authority, service or other body processing personal data on behalf of the data controller)

- Companies and other subjects, consultants and freelancers to whom mandates have been conferred for the management of compulsory fiscal, administrative, accounting, legal advice, etc. fulfilments;
- Any suppliers of IT, web, or other services necessary to achieve the purposes necessary to the management of the relationship.

**Within the company structure:** your data will only be processed by personnel expressly authorised by the Data Controller, with assurances of the adoption of a confidentiality agreement.

**Dissemination:** Your personal data will not be disseminated in any way.

**Transfer of data to non-EU countries:** For the use of the Newsletter service, after obtaining the explicit consent of the data subject, the data controller uses suppliers located in non-EU countries. For the transfer of data to non-EU countries, the existence and signing of Standard Contractual Clauses and possible additional measures in accordance with EDPB Recommendation 01/2020 has been verified. Notwithstanding these guarantees, for data processing (in ref. of Art. 49 of the GDPR), where applicable the existence of a contract or pre-contractual measures in favour of the data subject or consent to the transfer is verified.

**Retention period:** We inform you that, in compliance with the principles of lawfulness, purpose limitation, data minimisation, pursuant to Art. 5 of the GDPR, the retention period of your personal data is established for a period of time not exceeding the achievement of the purposes for which they are collected and processed, in the event that a contract is signed this retention period may cease with the forfeiture or termination of the contract, the same data may be retained, where applicable, for a further period of time for the purpose of the management of any litigation, the legal basis for such retention is the contractual obligation, and the legitimate interest of the data controller. In the same manner and with the same data protection guarantees, the data may be retained for a period of time in compliance with the obligations prescribed by the laws in force, by way of example on the basis of tax legislation for at least 10 years.

**Data Controller:** the Data Controller, in accordance with the regulations is "ATL GROUP SPA", with registered office in Via Bisaura, 15 - 48018 Faenza (RA) and operating offices in Via delle Fonde, 237/283 - 47032 Bertinoro (FC), Via Carrara Arginello, 5 - 48022 Lugo (RA), Via Savelli, 1 - 47122 Forlì (FC), VAT no.: 02065870400 in the person of its legal representative pro tempore. By sending an e-mail to the following address [atlgroup@atlgroup.it](mailto:atlgroup@atlgroup.it) or a fax to the number 0546 - 382235 you may request further information regarding the data provided. The website [www.atlgroup.it](http://www.atlgroup.it) contains further information on the privacy policies adopted by our Company. EU Reg. 2016/679: Articles 15, 16, 17, 18, 19, 20, 21, 22, 23 - Data Subject's Rights

1. The data subject shall have the right to obtain confirmation as to whether or not personal data concerning him exist, even if they have not yet been recorded, and communication of such data in intelligible form.

2. The data subject shall have the right to be informed of:

- a. the origin of the personal data;
- b. the purposes and methods of processing;
- c. the logic applied in the event of processing carried out with the aid of electronic instruments;
- d. the identity of the data controller, data processors and the representative designated pursuant to Article 5(2);
- e. the entities or categories of entity to whom or which the personal data may be communicated or who or which may get to know said data in their capacity as designated representative(s) in the State's territory, data processor(s) or person(s) in charge of the processing.

3. The interested party has the right to obtain:

- a. the updating, rectification or, where interested therein, integration of the data;
- b. the deletion, transformation into anonymous form or blocking of data processed in breach of the law, including data whose retention is unnecessary for the purposes for which the data were collected or subsequently processed;
- c. certification to the effect that the operations as per letters a) and b) have been notified, as also related to their contents, to the entities to whom or which the data were communicated or disseminated, unless this requirement proves impossible or involves a manifestly disproportionate effort compared with the right that is to be protected;
- d. portability of the data.

4. The data subject has the right to object, in whole or in part:

- a. on legitimate grounds, to the processing of personal data concerning him/her, even though they are relevant to the purpose of the collection;
- b. the processing of personal data concerning him/her for the purpose of sending advertising material or direct sales or for carrying out market research or commercial communication.

**Complaint:** Interested parties, where applicable, also have the right to lodge a complaint with the Garante as supervisory authority in accordance with the established procedures. For any further information, and in order to assert your rights, you may contact the data controller at the above references.

### **Consent**

#### **Formula for acquiring the consent of the data subject**

Marketing - newsletter reception service: subscription to the newsletter takes place through the provision of your free consent on the website **[www.liujoliving.com](http://www.liujoliving.com)**, which can also be reached through the framing of dedicated QR Codes located inside the point of sale. Further information on the newsletter service is provided in specific information documents supplementing this one available at **[www.liujoliving.com](http://www.liujoliving.com)**. Your consent to receive the newsletter will be recorded (IP address, email address, date and time) by ticking the box below the email entry, or by ticking/clicking in the appropriate box, and in conjunction with pressing the “send” / “ok” button. This consent will be stored in order to prove that it has been given, and to allow you to unsubscribe at any time, in addition to all the other rights set out above.