

## PRIVACY POLICY [WWW.PATROLLINESHOP.IT](http://WWW.PATROLLINESHOP.IT)

Privacy information pursuant to art. 13 of EU Regulation 679/2016 and of the Privacy Code ( Legislative Decree 196/2003, as recently amended by Legislative Decree 101/2018)

Your privacy is very important for Patrolline Società Cooperativa (hereinafter also " Patrolline " or Data Controller) and for this Patrolline collects and manages your personal data with the utmost care, adopting specific security measures. Below you will find the main information on the treatments carried out by Patrolline in relation to your personal data collected through the site [www.patrollineshop.it](http://www.patrollineshop.it) ("Site") both if you access the Site and simply decide to browse using the services, without proceeding to purchase, whether you decide to purchase one or more products.

We invite you to read the following Privacy policy, as well as our "Cookie Policy" and the General Conditions of Sale" of the Site.

### 1. Who is the data controller of your personal data.

Pursuant to current legislation and the provisions of EU Regulation 2016/679 (hereinafter also "GDPR") concerning the protection of individuals with regard to the processing of personal data, as well as the free circulation of such data, we inform you that: - the The data controller of your personal data is **Patrolline Group Società Cooperativa (hereinafter also " Patrolline " or "Data Controller"** , VAT number 03416251209, with registered office: Via S. Vitale 40/5 D, 40125 – Bologna.

- Telephone and contact details: 051/220797 – E-mail: [dpo@patrolline.it](mailto:dpo@patrolline.it) We

specify that this information relates exclusively to the processing of personal data carried out by Patrolline (possibly also through subjects who operate on its behalf as data processors ), while the interaction on your part with third parties other than Patrolline (for example social media or other third parties that you may eventually access through a link on the Site, through links, banners or other hypertext links) will result in the fact that the latter operate in turn as data controllers of your data and as such will provide you with specific information.

### 2. What personal data does Patrolline process

#### 2.1. Navigation data

Patrolline may process the personal data it collects while you browse the Site or use the services offered by the Site. The computer systems and software procedures used to operate our Site, in fact, automatically acquire some personal data whose transmission is implicit in the use of Internet communication protocols. This category of data includes your IP addresses or the domain name of the computer used to connect to the Site, the addresses in URI ( Uniform Resource Identifier ) notation of the requested resources, the time of the request, the method used to submit the request to the server, the size of the file obtained in response,

the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the operating system and your IT environment. These data are used exclusively for the following purposes and are processed for the time strictly necessary to fulfill the purposes:

- allow access to and navigation of the Site;
- obtain statistical information on the use of our Site;
- to check the correct functioning of the Site and to improve our offer and our services.

## **2.2 Data provided voluntarily**

For the simple consultation of the Site, no provision of your personal data is required. As a user, you have the possibility to proceed with the purchase of products without registering on the Site, nor will it be necessary to create a personal account.

During the purchase procedure, Patrolline collects personal data, useful for completing the order, namely, name, surname, shipping address, e-mail, telephone number and tax code.

Patrolline does not collect payment data, such as credit card data or its expiration date, which will be used for the purchase. This data will be encrypted and transmitted directly to the payment manager without passing through the Patrolline servers which therefore does not have access to this information nor can it save or archive it.

In the event that the purchased product does not meet expectations, the user has the option of requesting a replacement or return, by filling in and sending the form in the dedicated Return Management *session* . The data requested together with the request are the following: name, surname, street address, email , telephone number and information regarding the item being returned or replaced.

The Site also provides the option of subscribing to our newsletter by entering your email address in the dedicated form on the home page.

## **2.3. Particular data**

Patrolline does not deliberately collect particular categories of data, defined in the art. 9 of EU Regulation 679/16 such as data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as genetic data, biometric data intended to uniquely identify a natural person , data relating to the person's health or sex life or sexual orientation. Please do not provide such personal data through the Site.

## **3. For what purposes we process your data and what legal bases we use**

The personal data that you provide us will be used by Patrolline exclusively for the following purposes:

A) In the case of making a purchase through the Site, the execution of obligations deriving from the contractual sales relationships or the performance of pre-contractual activities, including the correct management of your purchase order and the necessary assistance in finalizing the order if necessary. The legal basis of the processing is the execution of a contract of which you are a part and/or the execution of pre-contractual measures.

B) fulfillment and compliance with obligations deriving from the law or from regulations and standards in force, in particular, in the administrative, accounting, tax and privacy fields. The legal basis is the fulfillment of one or more legal obligations to which Patrolline is subject .

C) management of general assistance activities and to respond to requests for information from users or customers of the Site, or to respond to any reports. The legal basis is Patrolline 's legitimate interest in responding to requests, which also coincides with the legitimate interest of the same users or customers of the Site who, in the face of a request, expect a response from the Data Controller.

The legitimate interest of Patrolline thus identified can be considered prevalent on the fundamental rights and freedoms of the interested party, also by virtue of these reasonable expectations and the relationship existing between the interested party and Patrolline , as well as in consideration of the nature of the data processed and the coincident interest of the interested parties themselves.

Patrolline to offer products similar to those purchased directly by e-mail (so-called soft spam purposes), provided that there is no opposition to this treatment in the manner indicated. The legal basis that allows the processing is the legitimate interest of the Data Controller to send this type of communication. This legitimate interest can be considered equivalent to the interested party's interest in receiving

**"soft spam"** communications . Pursuant to art. 130 of Legislative Decree 196/2003, the treatment put in place for this purpose does not require a specific consent from the interested party, who however, on the occasion of the sending of the communication made, is informed of the possibility of opposing the treatment at any time by exercising the so-called opt -out to stop such communications.

E ) Manage any complaints and/or disputes with customers of the Site. The legal basis is the legitimate interest of the Data Controller to manage problems that have arisen and customer complaints about products or services. This legitimate interest is equivalent to that of the customer to receive a response to communications or requests sent and to see the issues

raised handled.

F) Only with your prior express consent, your personal data will be processed for sending commercial and/or promotional communications (including the Newsletter) relating to the initiatives, products and services offered by Patrolline (direct marketing purposes ). The legal basis of the processing is the specific consent of the interested party which can be revoked at any time.

### **3. Mandatory or optional nature of the provision of data.**

The provision of your data is:

- Mandatory for purposes A), B), indicated in the previous point. In the absence of the requested data it will not be possible to conclude or execute the contract, nor to fulfill the legal obligations to which Patrolline is subject.
- Optional for purpose C). Failure to provide it prevents Patrolline from following up on requests for assistance or information.
- For purposes D) and E), the data used have already been collected by the Data Controller to pursue other purposes indicated above. Therefore, the provision of data by the parties is not expressly requested as Patrolline already has them.
- Optional for purpose F). In the absence of your specific consent, we will not be able to process your data for the achievement of the purpose in question.

### **4. How we process your personal data**

The processing of your data will be carried out by Patrolline through the collection, registration, conservation and processing, through the use of digital, electronic and telematic tools, suitable for memorizing, manage and transmit the data, with logic strictly related to the purposes themselves.

### **5. Who will process your personal data and to whom your personal data will be communicated**

The data processing will take place by personnel appointed and instructed by Patrolline , specifically authorized pursuant to article 4, paragraph 10 of EU Regulation 2016/679, and designated pursuant to art. 2 quaterdecies of Legislative Decree 101/2018, with procedures, technical and IT tools suitable for protecting the confidentiality and security of your personal data. Without prejudice to the communications and dissemination carried out in execution of legal obligations, the data may be communicated to third parties who operate on behalf of

Patrolline and according to its instructions, as **Data Processors** . Specifically, the data may be communicated:

- to companies or third parties in charge of shipping and/or delivery services for products sold through the Site;
- banks and companies that manage the payment circuits through which payments are made for products purchased through the Site;
- to freelancers or companies or consultants belonging to the following categories: internet providers, companies specialized in IT services, consultancy companies in charge of the installation, maintenance and updating of the Site and which Patrolline uses for the provision of its services including also the sending of newsletters by means of automated systems;
- to all those public and/or private entities, natural/legal persons (consulting, legal, administrative, fiscal, Judicial Offices, etc. ), if the communication is necessary or functional for the correct fulfillment of a legal obligation;
- to all subjects who have access to personal data by virtue of regulatory or administrative provisions;

The interested party may request a complete and updated list of the subjects appointed as data controllers by contacting one of the contacts indicated below.

**Your data will NOT be disclosed under any circumstances.**

## **6. How long and where we keep your personal data (data retention )**

The information and personal data that you provide through the Site, including the data freely provided by filling in the forms on the Site, will be kept for a limited period of time fulfillment of the purpose for which they are collected and in compliance with the applicable laws.

Specifically:

- Personal data collected through the Customer Service session and processed for the fulfillment of the sales contract, including the pre-contractual activity, are kept for 10 years from the completion of the contract, or in the event that the pre-contractual activity does not lead to the conclusion of a contract, for 2 years from your last contact.
- The personal data processed in the context of the management and keeping of the company accounts are kept for the time necessary to fulfill the tax obligations and to keep the accounting records, and in any case for a maximum time of 10 years .
- Personal data processed for "soft spam" activities are stored, in relation to this specific purpose, pursuant to and according to the terms of art. 130 of the Privacy Code and unless you expressly declare that you do not want to receive further communications ( opt -out).
- The processing of data for direct marketing purposes and the retention of personal data may be carried out until the consent is revoked by the interested party as provided for by the

Guarantor for the protection of personal data in provision n. 181 of 15 October 2020 , *provided that both consent was correctly acquired originally and that it is still valid in light of the rules applicable at the time of processing as well as the retention times established by the owner, and indicated in the information, in compliance with the Privacy regulation.* Otherwise you will be asked to renew your consent.

Once the stated purposes have been achieved or following the revocation of your consent, your personal data will be canceled or destroyed, unless otherwise requested by the authority, conservation requirements established by law, or different indications provided in particular sections of the Site. 7.

### **Transfer of data abroad**

The Data Controller DOES NOT transfer personal data abroad. The servers that host the site are located in European territory.

### **8. Security measures**

Patroline adopts adequate security measures to safeguard the confidentiality, integrity, completeness and availability of your personal data. Technical, logistical and organizational measures are developed which have as their objective the prevention of damage, loss, even accidental, alteration, improper and unauthorized use of the data processed.

We proceed to regularly test, verify and evaluate the effectiveness of the security measures, in order to guarantee continuous improvement in the security of the treatments.

### **9. What are your rights**

We remind you that in relation to your personal data you can exercise your rights towards the Data Controller, pursuant to articles 15 and following. of EU Regulation 2016/679, i.e. you will be able to obtain confirmation of the existence of your personal data and request their communication in an intelligible form. You will also have the right to obtain the updating, rectification, integration and cancellation of data or limitation of treatment. Finally, you will have the right to object, in whole or in part, for legitimate reasons, to the processing of your personal data, even if pertinent to the purpose of the collection. You will have the right to exercise the right to data portability and to lodge a complaint with the Supervisory Authority.

Below is the list of your rights

### **Rights of the interested party articles 15-22 of the EU Reg. 2016/679**

**Art. 15 Right of access of the interested party:** the interested party has the right to obtain confirmation as to whether or not personal data concerning him is being processed, in this

case, to obtain access to personal data and related information ( data categories, purposes, any recipients, the retention period or criterion...)

**Art.16 Right of rectification:** the interested party has the right to obtain from the data controller the rectification of inaccurate personal data concerning him without unjustified delay. Taking into account the purposes of the processing, the interested party has the right to obtain the integration of incomplete personal data, also by providing a supplementary declaration.

**Art. 17 Right to cancellation and to be forgotten:** the interested party has the right to obtain from the data controller the cancellation of personal data concerning him without unjustified delay and the data controller has the obligation to cancel personal data without unjustified delay, if one of the reasons pursuant to art. 17 par.1 lett. a,b,c,d,e,f , par.2, par. 3 lett. a,b,c,d,e . Art.18. Right to limitation of treatment: The interested party has the right to obtain from the data controller the limitation of treatment when one of the hypotheses referred to in article 18 par. 1 lit. a,b,c,d , par. 2, par.3.

**Art. 19 Obligation to notify in the event of rectification or cancellation of personal data or limitation of treatment:** The data controller informs each of the recipients to whom the personal data have been transmitted of any corrections or cancellations or limitations of treatment carried out in accordance with the art.16, of the art. 17, par.1, and of article 18, unless this proves impossible or involves a disproportionate effort. The data controller communicates these recipients to the interested party if the interested party requests it.

**Art.20 Right to data portability:** the interested party has the right to receive, in a structured format, commonly used and readable by an automatic device, the personal data concerning him provided to a data controller and has the right to transmit such data to another holder of the treatment without impediments by the holder of the treatment to whom he supplied them if the cases referred to in art.20 par.1 lett. a, b, par.2,3,4.

**Art.21 Right of opposition:** The interested party has the right to oppose at any time, for reasons related to his particular situation, the processing of personal data concerning him pursuant to article 6, par. 1, lit. eof, including profiling based on these provisions. If personal data are processed for direct marketing purposes, the interested party has the right to object at any time to the processing of personal data concerning him carried out for these purposes, including profiling insofar as it is connected to such direct marketing . If the interested party opposes the processing for direct marketing purposes, the personal data are no longer processed for these purposes.

## 10. How to exercise the rights of the interested party.

You can request information about the methods of treatment and the exercise of your rights as an interested party, through the following methods:

- for doubts or clarifications regarding this Information or on the methods of processing your personal data, you can contact the Data Controller **Patrolline Group Cooperative Society** , Via Cesare Cantù, 15/c, 22031 – Albavilla (CO),

Phone: +39 031/0352088

e-mail: [dpo@patrolline.it](mailto:dpo@patrolline.it)

- for formal requests to exercise rights by the interested party, it is preferable that they are sent via a request form provided by the data protection guarantor (downloadable through the following link <https://www.garanteprivacy.it/home/docweb/-/docweb-display/docweb/1089924>) addressed to Patrolline , for the attention of the DPO, by certified mail, to the address [patrollinegroup@pec.confcooperative.it](mailto:patrollinegroup@pec.confcooperative.it), or by ordinary mail to the address of the registered office in Via Cesare Cantù, 15/c, 22031 – Albavilla (CO).

## 11. Changes to this privacy policy

Patrolline may modify or simply update, in whole or in part, this Privacy Policy. Any modification or update to the Privacy Policy will be available to all users in the Privacy section of the Site as soon as the updates are active and will be binding as soon as they are published on the Site in this section, where the date of the last update will also be indicated. We therefore invite you to periodically check the contents of our Privacy policy. If you do not intend to accept these changes, you can stop using our site at any time.

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