

PRIVACY POLICY Q.R.G.B. SRL

DATA PROCESSING POLICY

This Website collects certain Personal Data of its Users. The information is provided in connection with Article 13 and 14 of Regulation EU 2016/679.

Data Controller

Q.R.B.G. SRL, with headquarters in Via Napoleone 19 Frazione Ponton - 37015 Sant'Ambrogio di Valpolicella (VR)
The Data Controller can be contacted at the Privacy Service of Q.R.G.B. Srl at privacy@quarella.com

Types of Data collected

The Personal Data collected by this Website, either independently or through third parties, includes: name, surname, email, address, telephone number, tax code.

Full details of each type of collected data are provided in the dedicated sections of this privacy policy or by means of specific disclosures displayed prior to the collection of the data.

Personal Data may be freely provided by the User or, in the case of Use Data, automatically collected during use of this Website.

The User assumes responsibility for any third-party Personal Data obtained, published or shared through this Website and warrants that he or she has the right to communicate or disclose them, freeing the Controller from any liability towards third parties.

Methods, legal basis, place of processing of collected data, retention period and purpose of processing

Method of processing

The Controller takes appropriate security measures designed to prevent unauthorised access, disclosure, modification or destruction of Personal Data.

Processing is carried out using computer and/or electronic tools, using organisational methods and logics strictly related to the stated purposes. In addition to the Controller, in some cases, other subjects involved in the organisation of this Website (administrative, sales, legal, system administration personnel) or external subjects (suppliers of third-party technical services, couriers, hosting providers, IT companies, communication agencies) may also access the data and may, if necessary, also be appointed as Processors by the Controller. The up-to-date list of Processors can be requested at any time from the Controller.

Legal basis of processing

The Controller processes Personal Data concerning the User if one of the following conditions is met:

- the User has provided his or her consent for one or more specific purposes;
- processing is necessary to fulfil a contract with the User and/or to fulfil pre-contractual measures;
- processing is necessary to comply with a legal obligation to which the Controller is subject;
- processing is necessary to fulfil a task in the public interest or in the exercise of official authority vested in the Controller;
- processing is necessary to pursue the legitimate interest of the Controller or of third parties.

The Data Subject may, however, ask the Controller at any time to clarify the specific legal basis of each processing operation and in particular to specify whether the processing is for the purpose of fulfilling a legal requirement, contractual requirement, or necessary to stipulate a contract.

Place

Data processing takes place at the Controller's premises and in any other location where the parties involved in processing are located. For more information, please contact the Controller. A User's Personal Data may be transferred to a country other than the one in which the User is located. For more information regarding the place of processing, the User may refer to the section on Personal Data processing details.

The User has the right to obtain information on the legal basis for the transfer of the Data outside the European Union, and on the security measures taken by the Controller to protect the Data.

Retention period

The Data are processed and stored for the time required by the purposes for which they have been collected.

Therefore:

- Personal Data collected for purposes related to the fulfilment of a contract of any nature between the Controller and the User shall be stored until that contract has been fulfilled. Maximum retention period: 10 years.
- Personal Data collected for purposes attributable to the legitimate interest of the Controller shall be stored until that interest is satisfied. The User can obtain additional information concerning the legitimate interest pursued by the Controller in the relevant sections of this document or by contacting the Controller.
- When processing is based on User consent, the Controller may store the Personal Data for longer until such time as consent is revoked. Moreover, the Controller may be required to store the Personal Data for a longer period in compliance with a legal obligation or by order of an authority.

At the end of the retention period, the Personal Data will be erased. Therefore, upon expiry of this period, the right of access, erasure, rectification and the right to Data portability can no longer be exercised.

Purposes of Data Processing

The User's Data are collected to allow the Controller to provide its Services. In particular:

1. The main purpose of processing of the provided personal data is to fulfil contractual or pre-contractual, management, administrative or legal obligations to which the Controller is subject.
2. The management and fulfilment of specific user contact needs.
3. The sending of our newsletter using the email address provided by the user.
4. The sending of information of a technical/commercial nature about our products using the data provided by the user (physical and electronic address)
5. The management of user-submitted CVs for evaluation for employment opportunities.

To receive additional, detailed information on the purposes of processing and the specific Personal Data relevant to each purpose, the User can consult the data processing disclosure published at the end of this document.

Rights of the Data Subject

Users may exercise certain rights with regard to the Data processed by the Controller. The relevant Articles are 15, 16, 17, 18, 20, 21, 22 of Regulation EU 2016/679.

In particular, the User has the right to:

- **revoke his or her consent at any time.** The User can revoke his or her previous consent for the processing of his or her Personal Data.
- **object to the processing of his or her Data.** The User can object to the processing of his or her Data when this occurs on a legal basis other than consent. Further details on the right to object are provided in the section below.
- **access his or her Data.** The User has the right to obtain information on the Data processed by the Controller, on certain aspects of processing and to receive a copy of the Data processed.
- **check and request rectification.** The User can check the correctness of his or her Data and request that it be updated or corrected.
- **obtain restriction of processing.** When certain conditions are met, the User may request the restriction of processing of his or her Data. In this case, the Controller will not process the Data for any purpose other than its retention.

- **obtain the erasure or removal of his or her Personal Data.** When certain conditions are met, the User can request the total erasure of his or her Data by the Controller (right to erasure).
- **receive his or her Data or have it transferred to another controller.** The User has the right to receive his or her Data in a structured, commonly used and machine-readable form and, where technically feasible, to have it transferred without hindrance to another controller. This provision is applicable when the Data are processed using automated tools and the processing is based on the User's consent, on a contract to which the User is party or on contractual measures connected therewith.
- **file a complaint.** The User may file a complaint with the competent data protection authority or take legal action.

Details on the right to object

When the Personal Data are processed in the public interest, in the exercise of official authority vested in the Controller or in pursuit of a legitimate interest of the Controller, Users have the right to object to processing for reasons connected with their particular situation.

Users are informed that, if their Data are processed for direct marketing purposes, they can object to processing without giving any reasons. To determine whether the Controller processes the data for direct marketing purposes, Users can refer to the respective sections of this document.

How to exercise rights

To exercise the rights of the User, Users may address a request to the Controller's contact details provided in this document. Requests are filed free of charge and processed by the Controller in the shortest time possible and, in any case, within one month.

Further information on processing

Defence in court

The User's Personal Data may be used by the Controller in legal proceedings or in the preparatory stages of those proceedings in order to defend against abuses in the use of this Website or its related Services by the User. The User declares to be aware that the Controller may be required to disclose the Data by order of public authorities.

Specific disclosures

At the User's request, in addition to the information in this privacy policy, this Website may provide the User with additional and contextual information regarding specific Services or the collection and processing of Personal Data.

System logs and maintenance

For operation and maintenance purposes, this Website and any third-party services it uses may collect system logs, that is, files that record interactions and which may also contain Personal Data such as the User's IP address.

Information not included in this policy

Additional information concerning the processing of Personal Data may be requested from the Data Controller at any time using the contact details.

Changes to this privacy policy

The Data Controller reserves the right to make changes to this privacy policy at any time, informing Users on this page and, if possible, on this Website and, if technically and legally feasible, notifying Users through one of the contact details held by the Controller. Please therefore consult this page regularly, referring to the date of the last modification indicated at the bottom.

If the changes affect processing for which the legal basis is consent, the Controller shall collect the User's consent again, if necessary.

Data Processing Disclosures – Regulation EU 2016/679

Q.R.G.B. SRL safeguards the confidentiality of the personal data it processes, drawing inspiration from principles of law and transparency, considering the protection of information processed for various reasons as a fundamental commitment.

Our company considers the correct processing of data and compliance with Regulation EU 2016/679 as essential elements in maintaining the high standards of quality that have always set us apart.

Outlined below are the disclosures required by current legislation concerning the various categories of data subjects and relative processing.

- [Disclosure for sending CVs](#)
- [Disclosure for clients](#)
- [Disclosure for suppliers](#)
- [Rights of the data subject](#)
- [Video surveillance disclosure](#)