



PRIVACY POLICY - SUPPLIERS

(General Data Protection Regulation - GDPR 2016/679)

This policy is relayed to natural persons and natural persons operating in the name and on behalf of legal entities pursuant to Art. 13 of the GDPR 679/2016 - "European regulation on the protection of personal data".

1. Purposes of processing, legal basis and retention period

We inform you that the personal data you provide and acquired by the Joint Controllers will be processed in compliance with the guarantees of privacy and security measures required by current legislation, including the help of electronic tools directly and/or through third parties, for the purposes set out below together with the legal basis of reference:

	PURPOSE	PROCESSED DATA	LEGAL BASIS
1	contract between FATTORIA VILLA SALETTA SOCIETA' AGRICOLA SRL and	Personal and contact data Payment data and other financial Data relating to the performance of	The processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract - Union Law (GDPR 2016/679)
2	Purposes related to the fulfillment of to the fulfillment of fiscal, accounting obligations and other legal obligations	Payment data and other financial	The processing is necessary for compliance with a legal obligation to which the controller is subject - Union Law (GDPR 2016/679)
3	Exercise of the rights of the Joints Controllers, for example the right of defense in court	Data relating to the performance of	The processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party - Union Law (GDPR 2016/679)

2. Compulsory or optional nature of the provision of data and consequences of a refusal to provide

The provision of data for the purposes referred to in points 1, 2 and is optional but necessary to execute the contract between the parties. Therefore, any refusal to provide such data may determine the impossibility for Joint Controllers to finalize the contract with the supplier.

3. Retention Period

The data will be processed for the period of time necessary to pursue the aforementioned purposes and in any case no longer than the legal retention time required by law (currently 10 years from the moment of termination of the contractual relationship). In the event of a pending trial, the data will be processed until they are terminated.

4. Contact details of the Joint Controllers

FATTORIA VILLA SALETTA SOCIETA' AGRICOLA SRL SRL e VS DEVELOPMENT SRL are Joint Controllers and responsibles for the lawful and correct use of your personal data, and who you may contact for any information or requests at the following addresses:

FATTORIA VILLA SALETTA SOCIETA' AGRICOLA SRL

Registered office: VIA FERMI 14, LOC. MONTANELLI, 56036, PALAIA, PISA, ITALY





Contacts and addresses: Telephone: +39 0587/628121 E-mail: privacy@villasaletta.com

VS DEVELOPMENT COMPANY SRL Registered office VIA RICCARDI 3, 56036, PALAIA (PI)

Contacts and addresses: Telephone: 0587/628121 E-mail: privacy@villasaletta.com

5. Receiver and transfer of non-EU data

Your data may be transferred outside the EEC. In this case the Joint Controller ensure that the processing of your personal data by these subjects to whom the data is transferred, will be done in accordance with the European Regulation 679/2016, in compliance with the principles indicated in art. 45 of the GDPR 2016/679 relating to the existence of an adequacy decision by the European Commission, or in the absence of such decisions in the presence of appropriate safeguards pursuant to art. 46 of the GDPR 2016/679, or in compliance with the principles given in Art. 49 paragraph 1 lett b) — transfer necessary for the execution of a contract concluded between the data subject and the Joint Controllers. Further details and copy of the data may be obtained by contacting the Joint Controllers at the addresses given in point 4.

Your data can be communicated not only to the personnel assigned to the processing but also to the following subjects:

- a) private and public subjects to carry out administrative and legal procedures in compliance with the provisions of EU Reg. no. 679/2016;
- b) consultants and companies that assist the Company from an IT and infrastructural point of view;
- c) professionals and consultants who assist the Company from a fiscal, commercial and legal point of view;
- d) banks and credit institutions;
- e) clients of the Company, where the communication of the data is necessary for the performance of the services object of our collaboration contract;
- f) other companies and professionals who collaborate with the Company for the performance of the services subject of the contract.

The data will not be subject to other methods of dissemination.

6. Rights of the data subject

We inform you that as data subject you have, in addition to the right to submit a complaint to the Supervisory Authority, the rights listed below, which you can assert by asking a specific request to the Joint Controllers, contacting him at the addresses indicated in point 4.

GDPR Regulatory Ref.	Rights of the data subject	
Art. 15 – Right of access	You have the right to obtain from the Controller, confirmation as to whether or not your personal data are being processed, and where this is the case, access to the personal data and information regarding the processing.	
Art. 16 – Right of rectification	You have the right to obtain from the Controller without undue delay, the rectification of inaccurate personal data. Taking into account the purposes of the processing, you have the right to have incomplete personal data completed, also by means of providing a supplementary statement.	
Art. 17 – Right of erasure (right to be forgotten)	You have the right to obtain from the Controller, the erasure of your personal data without undue delay and the Controller is obliged to cancel the personal data without undue delay.	





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	You have the right to obtain from the Controller, restriction of processing where one of the following applies:
	a) 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;
Art. 18 – Right to restriction of	b) the processing is unlawful, and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
processing	c) 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 defense of legal claims;
	d) the data subject has objected to processing pursuant to Art. 21, paragraph 1, pending the verification whether the legitimate grounds of the controller override those of the data subject.
Art. 20 – Right to data portability	You have the right to receive data in structured, commonly used and machine-readable format automatized devices, and have the right to transmit such data to another Controller without hindrance from the Controller to which the data has been given. In exercising your rights regarding data portability, you are entitled to have the data transmitted directly from one Controller to the other, where technically feasible.
Art. 21 — Right to object	You have the right to object at any time to the processing of your personal data on grounds relating to your personal situation, based on Art. 6, paragraph 1, letters e) or f), including profiling based on those provisions. If you provided your consent to one or more specific objectives, you have the right to revoke that consent any time.
Art. 22 – Right to automated decision making, including profiling	You have the right not to be subjected to a decision based solely on automated processing including profiling, which produces legal effects concerning yourself or similarly affecting you.