INFORMATION NOTICE ON THE PROCESSING OF PERSONAL DATA

Pursuant to Article 13 of Regulation (EU) 2016/679
General Data Protection Regulation

NAVIGATION ON THE INTERNET WEBSITE CASAGRANDE.COM

Below we provide a brief description of the essential features of the processing of your personal data carried out by **Casagrande S.p.A.**, with registered office in Fontanafredda (PN), Via Malignani 1, acting as Data Controller (hereinafter the "Controller"), addressed to natural persons who come into contact with our Company (the "Data Subjects"). The processing will be carried out in accordance with Regulation (EU) 2016/679 – General Data Protection Regulation (the "Regulation") and Legislative Decree No. 196 of 30 June 2003, as amended by Legislative Decree No. 101/2018 (hereinafter the "Code").
By "data" we mean "*any information relating to an identified or identifiable natural person*" and by "processing" we mean "*any operation or set of operations which is performed upon personal data or sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or any other form of making available, comparison or interconnection, restriction, erasure or destruction*".

For further details, please refer to the detailed information notice which follows.
The information notice on the processing of personal data relating to navigation on the Company's website is made available in a concise manner in the summary table below, which will enable you to easily access the key information concerning the processing of personal data. A more detailed information notice is also provided below, setting out in full the information that we are required to provide pursuant to Article 13 of the GDPR.

Who is the data controller?	**Casagrande S.p.A.**, with registered office in Fontanafredda (PN), Via Arturo Malignani 1; contact details are privacy@casagrandegroup.com.
Who is the Data Protection Officer (DPO)?	The appointed DPO can be contacted at dpo@casagrandegroup.com.
What personal data do we process?	• Ordinary personal data, such as name, surname, contact details, and company name; • Browsing data; • Data collected, if any, via cookies.
Why do we process personal data? (Purposes)	1. To enable you to navigate our website; 2. To carry out research and/or statistical analysis on aggregated or anonymous data, without the possibility of identifying the user; 3. To comply with legal obligations or to comply with orders issued by public authorities; 4. To establish, exercise, or defend a legal right in judicial proceedings or whenever authorities exercise their functions; 5. For various processing operations (retention, archiving, processing), in any event consistent with such purposes. In particular, your personal data may be processed for the following purposes: to respond to information requests; to

	prepare quotations; to enable the provision of the services requested; and to comply with legal obligations; 6. Marketing.
What is the legal basis for processing?	a. Processing under point 1), 2) and 4) is based on the legitimate interest of the Data Controller; b. Processing under point 3) is necessary for compliance with legal or regulatory obligations incumbent upon the Data Controller; c. Processing under point 5) is necessary for implementing pre-contractual measures and for performing the contract in place between the Data Controller and the Data Subject; d. Processing under point 6) is based on a specific and optional consent for processing, provided by the Data Subject.
How do we process personal data?	In both electronic and paper format, applying all precautionary measures adopted by the Data Controller to ensure the security, confidentiality and control of the data. The data may also be stored and processed on servers located outside the European Union, in compliance with the applicable legal provisions.
To whom do we disclose personal data? (Categories of recipients)	a. Employees, collaborators, and any persons appointed and authorised by the Data Controller; b. Service providers acting as Data Processors pursuant to Article 28 GDPR, such as, for example, the party managing the website; c. Those authorised by law to access the data; d. Persons to whom disclosure is necessary for the performance of contractual obligations; e. Public authorities; f. Third parties. Personal data processed by the Controller shall in no case be made publicly available or disseminated.
How long do we retain personal data?	Personal data will be stored for the period necessary to achieve the purposes listed above. Under no circumstances may the processing, for any given data, extend beyond the expiry of the limitation period applicable to the exercise of rights connected to that data. Criteria for determining further retention periods: a. Pursuit of the purposes related to processing; b. Legally required retention period; c. Withdrawal of consent by the data subject (in case of consent-based processing); d. Maximum term permitted by applicable legislation to protect the Controller's rights

	and/or interests.
Is the provision of personal data mandatory or optional? What happens in case of refusal?	If you wish to browse the website, you must provide browsing data and data collected through certain cookies (technical cookies). In case of failure to provide such data, your browsing experience on this website may be suboptimal and we may be unable to meet your requests. The provision of consent by the Data Subject for the purposes referred to above is free and voluntary; in the absence of consent, the Controller will limit the processing to the other purposes, and your ability to use the services shall not be adversely affected in any way.
What are the data subject's rights?	The Data Subject has the right to: a. Access the data held by us and request communication thereof in an intelligible form; b. Request updating, rectification and/or integration; c. Request erasure ("right to be forgotten"); d. Request restriction of processing; e. Request notification of updating, rectification, erasure or restriction; f. Request data portability; g. Object to processing; h. Lodge a complaint with a supervisory authority.

1 - Identity and Contact Details of the Data Controller

The Data Controller is Casagrande S.p.A., with registered office in Fontanafredda (PN), Via Arturo Malignani 1. The Controller's contact details for handling data subjects' requests, as specified in point 8 below, are: privacy@casagrandegroup.com.

2 - Contact Details of the Data Protection Officer (DPO)

The appointed DPO may be contacted at: dpo@casagrandegroup.com.

3 - Types of Data Processed

1. Data voluntarily provided by the user

The website processes only ordinary personal data, such as: name, surname, company name, country, email address, and telephone number.

2. Navigation data

This category of data includes the IP addresses or domain names of the computers or other devices used by data subjects who connect to the website, the addresses of the requested resources, the time of the request, the method used for submitting the request to the server, the size of the file obtained in response, the numerical code indicating the status of the server's response (success, error, etc.), and other parameters relating to the operating system and the data subject's computing environment.

For information on cookies, please refer to the specific Cookie Policy available on the website www.casagrandegroup.com.

4 - Purposes and Legal Basis for Processing

The Data Controller will carry out the processing for the following purposes:

1. to enable the user to use the services and functionalities available on the website, on the basis of the legitimate interest of the Data Controller;
2. research and/or statistical analysis on aggregated or anonymous data, without the possibility of identifying the user, aimed at measuring the functioning of the website, measuring traffic, and assessing usability and

interest in the website (without processing of data by the Data Controller), on the basis of the legitimate interest of the Data Controller;
3. compliance with legal obligations to which the Data Controller is subject;
4. necessity to establish, exercise or defend a legal right in judicial proceedings or whenever the competent authorities exercise their functions, on the basis of the legitimate interest of the Data Controller;
5. carrying out various processing operations, in any event in terms compatible with such purposes. In particular, personal data may be processed for the following purposes: replying to information requests; preparing quotations; enabling the provision of the requested services; and compliance with legal obligations. This processing is necessary for implementing pre-contractual measures and for performing the contract entered into with the Data Subject;
6. Marketing purposes, including the sending, also on a periodic basis (for example by newsletter), of advertising or promotional material, direct-sales communications, market research and/or commercial and promotional communications, including invitations to trade fairs, meetings, training courses, competitions and/or other private/public events organised for the promotion of the Company's business, carried out either directly by the Company or through specialised external service providers. This may occur through traditional means of contact as well as by electronic mail. Data for this purpose may be processed subject to the prior explicit and specific consent of the Data Subject. The provision of consent for this purpose is therefore free and voluntary; in the absence of consent, the Data Controller will limit processing to the purposes set out in the preceding points, without any prejudice to the possibility of using the services. Even if consent for this purpose is granted, it may be withdrawn at any time by making a simple request to the Data Controller.

5 - Processing Methods

The processing of the Data will be carried out by means of electronic or IT systems, in compliance with the Regulation and the Code, and in any event in a manner that ensures the security and confidentiality of the data and prevents unauthorised disclosure or use, alteration or destruction, by means of appropriate physical, logical and organisational security measures.
Where necessary for the achievement of the purposes referred to in paragraph 4, the Data Subject's Data may be transferred abroad, to countries or organisations outside the European Union that ensure compliance with the processing methods required by the GDPR.

6 - Data Recipients

The data may be disclosed only to the extent strictly necessary and within the scope of their respective responsibilities, and solely for the purpose of achieving the purposes described above, to the following parties:

a) persons to whom disclosure of the data is necessary for the functioning of the website, who act as Data Processors pursuant to written agreements entered into with the Data Controller, such as, for example, the party managing the website;
b) persons appointed and authorised by the Data Controller who have undertaken an obligation of confidentiality or are subject to an appropriate legal obligation of confidentiality (e.g., employees and collaborators of the Data Controller).

The data will not be made publicly available or disseminated.
In order to comply with legal obligations, regulations, Community legislation or contractual obligations, as well as to exercise any rights in judicial proceedings, the following third-party subjects may have access to the Data Subject's data: **(i)** tax, legal or accounting consultants; **(ii)** companies providing the Data Controller with services instrumental to the management of the contractual relationship (for example, providers of management software applications); **(iii)** public and private authorities and supervisory bodies (e.g., the Italian Revenue Agency, the judicial authorities, etc.).

7 - Data Retention Period

Within the context of the above-mentioned purposes, the data will be retained for the period strictly necessary to achieve the purposes for which they were collected and processed. The criterion for determining the actual retention period will be represented by the statutory

limitation period applicable to any claims arising from the relationship with the Data Subject.

Without prejudice to the need to retain the data in order to comply with legal or regulatory obligations incumbent on the Data Controller or to establish, exercise or defend rights in judicial proceedings, the Data Subject's data will not be retained for longer than 10 years after termination of the relationship, unless the limitation period is specifically interrupted; thereafter the same data will be either destroyed or irreversibly anonymised, except where their further retention is required to comply with legal obligations, to comply with orders issued by Public Authorities and/or Supervisory Bodies, or to ensure that the Company can, if necessary, exercise and protect its rights and interests, judicially or otherwise, arising from, connected to or related to the relationship and/or its subject matter.
Personal data processed for additional optional purposes (marketing purposes) will be erased after 5 years, a period considered appropriate given that these data relate to the sale of goods under the contract and, in any event, not beyond the withdrawal of consent, without prejudice to the lawfulness of processing based on consent prior to its withdrawal.
Data collected by means of cookies will be retained for the period specified for each individual cookie. For further information, please refer to the cookie policy on the website www.casagrandegroup.com.

8 - Mandatory or Optional Nature of Data Provision

In order to browse the website, the user must provide navigation data and data contained in certain cookies (technical cookies). In the event of failure to provide such data, the user may experience a suboptimal browsing experience on the website, and we may be unable to meet the related requests.
The provision of consent by the Data Subject for marketing purposes is free and voluntary; in the absence of such consent, the Data Controller will limit processing of the data to other purposes, without in any way prejudicing the possibility of using the services.

9 – Redirect to external websites

The website uses so-called social plug-ins, i.e. special tools that allow the functionalities of the social network to be incorporated directly into an internet site (for example, the link to Facebook). Each social plug-in present on the Website is identified by the logo owned by the relevant social platform; in this case, for example, the Facebook logo.
If the user interacts with the social plug-in, the information relating to the Data Subject is transmitted directly to the social platform, which processes the data as an independent data controller; therefore, for further details regarding the purposes and methods of processing, the rights exercisable and the retention of personal data, users are invited to consult the privacy policy of the relevant social networks.

10 - Data Subject Rights

By sending a written communication to the address privacy@casagrandegroup.com, or by sending a registered letter with return receipt to the following address: CASAGRANDE S.p.A., registered office in Fontanafredda (PN), Via Arturo Malignani 1, or by sending a PEC (certified email) to casagrande@legalmail.it, each Data Subject may at any time exercise the rights set out in Articles 15 et seq. of the Regulation, including:
(i) obtaining confirmation as to whether or not personal data concerning him or her are being processed; **(ii)** obtaining access to his or her personal data and to the information referred to in Article 15 of the Regulation; **(iii)** obtaining the rectification, without undue delay, of inaccurate personal data concerning him or her, or the completion of incomplete data; **(iv)** requesting the erasure of personal data concerning him or her, without undue delay; **(v)** requesting the restriction of processing of personal data concerning him or her; **(vi)** being informed of any rectifications, erasures or restrictions of processing carried out in relation to personal data concerning him or her; **(vii)** receiving, in a structured, commonly used and machine-readable format, the personal data concerning him or her; **(viii)** objecting, at any time and on grounds relating to his or her particular situation, to the processing of personal data concerning him or her carried out on the basis of the legitimate interest of the Data Controller.

The complete list of the Data Subject's rights may be found at: https://www.garanteprivacy.it/Regolamentoue/diritti-degli-interessati.
The exercise of the above-mentioned rights is not subject to any formal requirements and is free of charge. A response to the Data Subject's request will be provided within one month from its receipt. In cases of particular complexity, this period may be extended; in such cases, the Data Controller undertakes to provide at least an interim communication within one month from receipt of the request.
Where one of the rights provided for by the Regulation is exercised, the Data Controller reserves the right to verify the identity of the Data Subject making the request, by requiring the submission of a photocopy of an official identification document confirming the legitimacy of the request. Once the identity of the requesting Data Subject has been confirmed, the photocopy received will be immediately destroyed.

11 - Complaint to the Supervisory Authority
If the Data Subject considers that the processing concerning him or her infringes the provisions of the Regulation, he or she may at any time lodge a complaint with the Data Protection Authority (www.garanteprivacy.it), or with the Authority of the country in which he or she habitually resides, works or where the alleged infringement occurred. In any event, for any complaints, we invite the Data Subject to contact our Data Protection Officer before approaching the Supervisory Authority, so as to prevent and resolve any disputes amicably and promptly, with the utmost courtesy, seriousness and discretion.