

INFORMATIVA AL TRATTAMENTO DEI DATI PERSONALI

Dievole Srl – Località Dievole, 6 – 53019 Castelnuovo Berardenga, Siena, Tax Code 01000140523, as Data Controller, is constantly committed to protecting the privacy of its users and can be contacted at the following details: e-mail: info@dievole.it; Telephone: (+39) 0577 322613

This document has been drawn up pursuant to Articles 13 and 14 of EU Regulation 2016/679 in order to allow you to become familiar with our privacy policy, to understand:

- how your personal information is managed when you use our website and the services made available;
- how to provide informed consent to the processing of your personal data.

The information and data provided by you or otherwise acquired in the context of using the services made available by D'Wine Club (hereinafter the "Services") will be processed in compliance with the provisions of the Regulation and confidentiality obligations.

Processing will be carried out in accordance with the principles of lawfulness, fairness, transparency, purpose limitation, data minimization, accuracy, integrity, confidentiality, and storage limitation.

Browsing data

The computer systems and software procedures used to operate the Website, during their normal operation, acquire personal data whose transmission is implicit in the use of Internet communication protocols.

This information is not collected in order to be associated with identified individuals, but by its very nature could, through processing and association with data held by third parties, allow users to be identified. While browsing the Website, certain technical data are automatically collected, including IP addresses, domain names of the devices used, URI (Uniform Resource Identifier) addresses of requested resources, time of request, request method, size of the file obtained in response, server response status code (e.g. successful, error), and other parameters related to the user's operating system and IT environment.

These data are processed exclusively for anonymous statistical purposes, to monitor the correct functioning of the Website and to identify any anomalies or abuses. The data are deleted immediately after processing. The data may be used to ascertain liability in the event of hypothetical computer crimes to the detriment of the website or third parties; except for this possibility, at present web contact data are not retained for more than seven days.

Data of third parties voluntarily provided by the data subject

When using the Website's services, the processing of personal data of third parties communicated by you may occur. In such cases, you act as an independent data controller, assuming all obligations and responsibilities provided for by applicable law. Therefore, you release the Data Controller from any dispute, claim, or request for compensation arising from the processing of such data in violation of applicable legislation.

In any case, if you provide or process personal data of third parties through the Website, you guarantee that you have previously obtained the consent of the data subject to the processing, assuming all related responsibility.

Cookies

Details of cookies sent through the Website are provided in the Cookie Policy, which can be found directly in the Cookie Policy section.

INFORMATIVA AL TRATTAMENTO DEI DATI PERSONALI

Purposes of processing

Subject to your specific consent where required, the processing we intend to carry out has the following purposes:

- a) to enable browsing of the Website and the purchase of the products made available;
- b) to respond to specific requests submitted to our organization via email addresses or through the booking of your stay and/or other activities that may be available;
- c) to comply with obligations provided for by applicable laws, regulations, or EU legislation, or to satisfy requests from authorities;
- d) to send you promotional and marketing communications to the email address you provided. Please note that the Data Controller collects a single consent for the marketing purposes described herein, pursuant to the General Measure of the Italian Data Protection Authority "Guidelines on promotional activities and combating spam" of July 4, 2013. Should you wish to object to the processing of your data for marketing purposes carried out using the means indicated above, or to withdraw your consent, you may do so at any time by contacting the Data Controller at the details provided in this notice, without affecting the lawfulness of processing based on consent given prior to withdrawal, or by clicking the appropriate link at the bottom of each e-mail you receive.

Legal basis and mandatory or optional nature of processing

The legal basis for processing Personal Data for the purposes referred to in points (a–b) is:

- Article 6(1)(b) of the Regulation, as processing is necessary for the provision of the Services or for responding to requests from the data subject. Providing Personal Data for these purposes is optional; however, failure to provide such data would make it impossible to activate the Services offered by the Website.

The legal basis for processing Personal Data for the purpose referred to in point (c) is:

- lawful processing pursuant to Article 6(1)(c) of the Regulation. Processing is necessary to comply with a legal obligation to which the Data Controller is subject.

The legal basis for processing for the purposes indicated in points (d–e) is:

- Article 6(1)(a) of the Regulation, i.e. consent. Providing your Personal Data for the purpose referred to in point (d) is optional; no consequences are foreseen in the event of refusal.

Recipients of personal data

Dievole S.r.l., Dievole S.p.A., and Podere Brizio S.r.l. are part of a corporate group active in the production and marketing of wine products.

The websites managed by these companies - tenutelecolonne.com, tenutameraviglia.com, poggiolandi.it, poderebrizio.it, and dievole.it - allow users to register and/or access the program called D'Wine Club. Through this registration, it is possible to purchase products from the different companies of the group using a single access area.

For organizational and management purposes related to the operation of the D'Wine Club and order management, the personal data collected may be processed jointly by the group companies, each acting as an independent data controller or, where applicable, as joint controllers pursuant to Article 26 GDPR.

In addition, your Personal Data may be shared, for the purposes set out above, with:

- entities that typically act as data processors pursuant to Article 28 of the Regulation;

INFORMATIVA AL TRATTAMENTO DEI DATI PERSONALI

- entities, bodies, or authorities acting as independent data controllers to whom it is mandatory to disclose your Personal Data pursuant to legal provisions or authority orders;
- persons authorized to process Personal Data pursuant to Article 29 of the Regulation, necessary to carry out activities strictly related to the provision of the Services, who have undertaken confidentiality obligations or are subject to an appropriate legal obligation of confidentiality (e.g. employees).

Transfer of personal data

Users' personal data may be transferred to countries outside the European Union. In particular, data are processed on servers located in Uruguay, a country recognized by the European Commission as providing an adequate level of data protection pursuant to Article 45 of Regulation (EU) 2016/679 (GDPR).

Furthermore, solely for the provision of the newsletter service and subject to the data subject's consent, certain personal data (name and email address) may be transferred to the United States of America to service providers acting as Data Processors and ensuring an adequate level of personal data protection through adherence to the EU-US Data Privacy Framework, pursuant to Article 45 GDPR.

In any case, personal data transfers take place in compliance with the safeguards, security measures, and rights provided for by the GDPR.

Data retention

Personal Data processed for the purposes specified above will be retained for the time strictly necessary to achieve those purposes, in compliance with the principles of data minimization and storage limitation pursuant to Article 5(1)(e) of the Regulation. In any case, the Data Controller will process Personal Data for the time necessary to fulfill contractual and legal obligations.

Further information regarding the data retention period and the criteria used to determine such period may be requested by writing to the Data Controller.

Rights of data subjects

You have the right to access your data at any time pursuant to Articles 15–22 GDPR. In particular, you may request rectification, erasure, restriction of processing in the cases provided for by Article 18 GDPR, withdrawal of consent, data portability in the cases provided for by Article 20 GDPR, and you may lodge a complaint with the competent supervisory authority pursuant to Article 77 GDPR (Italian Data Protection Authority).

You may submit an objection request to the processing of your data pursuant to Article 21 GDPR, indicating the reasons justifying the objection; the Data Controller reserves the right to assess your request. Requests must be submitted in writing to the Data Controller at the contact details indicated above.

Amendments

The Data Controller reserves the right to amend or update the content of this notice, in whole or in part, including as a result of changes in applicable legislation, informing you of such changes as soon as they are introduced. Such changes will be binding as soon as they are published on the Website. The Data Controller therefore invites you to regularly visit this section to review the most recent and updated version of the privacy policy.