

## STATEMENT EX ART. 13 REG. UE 2016/679

*Before providing us with any data about you, read this information carefully to know who we are, what kind of data we process, for what purposes and in what way, and which rights you can assert in relation to the processing of your personal data. We ask you to give us your consent to the processing of your data, but we remind you to do so only if you agree with what is written in this statement. Read it, it's in your best interest!*

### **A) Who is the Data Controller?**

The Data Controller is Vaia s.r.l., with registered office in Borgo Valsugana (TN), 38051 in Via Puisse, 23, in the person of the legal representative p.t, Cod. Ateco: 479110, tel. 0461.842063 mobile 340.7730126 - 340.8972281 mail. [info@vaiawood.com](mailto:info@vaiawood.com), CEM [vaiasrl@pec.it](mailto:vaiasrl@pec.it)

### **B) What data do we process, where do we collect your personal data, on what legal basis, and where do we treat them?**

You provide us with your data by filling out the Contact Form in the Become Partner Section, by writing us by e-mail or post letter, by asking us a question or by calling the indicated contact numbers.

We treat your personal details, your contact details, your email address or the mobile telephone number you left us by filling out the contact form.

Generally, we do not treat any data classified as "Particular" pursuant to Article 9 of the Reg EU 679/2016 - GDPR (i.e. data suitable to reveal racial origin or ethnicity, political opinions, religious or philosophical conditions, trade union membership, biometric data suitable for the unique identification of a person's genetic or health-related data, sex life or sexual orientation) or data relating to criminal convictions and criminal offenses pursuant to Article 10 of the GDPR.; should it be necessary to process data of this type, we will request your prior consent.

Some data are stored by the server because they are acquired automatically during your navigation on our site. This is the data that identifies your PC or some of your actions on the site. These data allow us to find you only if we cross them with other information. For a better understanding of these technical aspects, read our information page on cookies and the Privacy Policy, where you will find collection methods for navigation data and storage times.

According to the EU Regulation 2016/679, the processing of personal data is allowed only if one of the following conditions hold:

- the User has given consent for one or more specific purposes;
- the processing is necessary for the execution of a contract with the Data Subject and / or for the execution of pre-contractual measures;
- the processing is necessary to fulfill a legal obligation to which the Data Controller is subject to, or to safeguard the vital interests of the Data Subject or of other natural person;
- the processing is necessary for the performance of a public interest task or for the exercise of public powers vested in the Data Controller;
- the processing is necessary for the pursuit of the legitimate interest of the Data Controller or third parties (i.e. for monitoring computer security, to prevent fraud, when the Data Subject is employed by the Data Controller and the processing takes place due to this relationship, etc ..).

In our case, the processing of your data takes place on the basis of your free and informed consent or, in some cases, to fulfill a contract or a pre- or post-obligation contract, to respond to an information request, to find your request, or to involve you in a project you have been paying attention to.

We will also be able to process web traffic data based on a legitimate interest, to a strictly necessary and proportionate extent, to ensure the security of networks and information, to avoid or restore service blocks, to prevent fraudulent access, etc., as specified in Recital 49 of the EU Regulation 2016/679.

Your data are processed at our office in Borgo Valsugana (TN) or, limited to some computer data, at the Company's data center that manages the hosting space (Aruba) in Arezzo, Milan or Ktis – locations that, however, are located in Europe and are therefore subject to the GDPR.

We also inform you that data processed using IT methods will be transferred abroad limited to applications that take advantage of Google Drive or Dropbox cloud services or other features, which are located outside the EU and are treated in accordance with the provisions of art. 44 (and following) of GDPR.

### **C) Do we profile?**

By profiling, EU Reg. 679/2016 means “any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements”. Who engages in profiling, for example, proceeds to the processing and analysis of information with respect to preferences, habits, consumption choices, with the aim of dividing the interested parties into "profiles" or in homogeneous groups by behavior or specific characteristics (i.e. customer profiling), etc or in order to evaluate habits, the degree of satisfaction with the services, or other.

Vaia does not carry out profiling in a strict sense, but it can use advertising services for the purpose of marketing, use cookies or other funnel or SEO techniques (whose working principles are explained to you in detail in the Cookies Policy, which we invite you to read) or proceed to survey and rank customers' appreciation with respect to the product purchased, revising, where possible, all your data anonymously.

Your data is not used for decision-making of automated data analysis, nor are they used for the release of judicial and administrative deeds or measures.

If you are interested in the details of data profiling, you can contact us to express your opinion and get an explanation about the adopted techniques.

### **D) Why do we process your data?**

We treat your common data for the following purposes:

1) to respond to the request for information you have sent us if you have filled out the contact form in the Become a partner section, to contact you if you have requested it or expressed an interest in receiving more information about one of our projects, if you have shown your willingness to become our partner or want to support our environmental protection project or other initiatives, to fulfill your order and manage the associated logistic, administrative and accounting charges (for example to identify your login credentials if you accesses the e-commerce area, to carry out the transport and delivery of the purchased goods, to bill the paid amount, etc.), to better carry out our customer care function (requests, technical support for the installation of the product etc ...) to collect your feedback (product appreciation, level of interest in our initiatives, proposals, suggestions) and to improve the product, the services offered, the pre and post contractual assistance. In particular, by becoming our partner, you can collaborate with us in achieving these objectives:

– **Corporate social responsibility – support your territory:**

Support with us the recovery of trees and the planting of new plants - support the Vaia project

– Participate in the Project - **an Iconic object:**

Buy Vaia for your employees, your best sellers, your best customers, stakeholders and partner

– The image of your company – **the environment and the future:**

a. Tell your customers what your idea of the future is

b. Promote your brand with the Vaia project - in our social networks, site, and community

– A product for your reality - **your idea of business:**

Collaborate actively and share Vaia in your stores

2) to be able to comply with what is required by the law, regulations and EU legislation, as well as by instructions given by the Control Authorities (for tax regulations, or to collect your consent for the processing of data, or other reasons), to protect our rights also in court, or to perform anonymous statistics (for example anonymous market surveys or verification of anonymous web traffic);

3) to promote our activity via telephone (telemarketing and teleselling), newsletters, participation in trade fairs, meetings or focal points in the sector, press relations, direct e-mail marketing (DEM), insertions or banners on other information portals, advertising, web funnelling, partnership enhancement or other techniques for promotional purposes, to optimize the offer itself (also through focused and selected analysis) in case you have given us explicit consent, to improve the quality of customer care and of our sales network.

In particular, regarding point D3), if you give us your consent, you can:

- keep yourself up-to-date on new products and services. The sending of commercial communications, as well as direct sales, can also take place in an automated manner, such as telephone, SMS, MMS, fax, ordinary and electronic mail, video, wap / web banners, internet messaging or push notifications via the app. These communications may include invitations to events, products and services (including viewing of demos, tutorials, digital services and audiovisual media services), including commercial partners with whom we have entered into commercial agreements; they may include market research and surveys, in the limits in which you have authorized the communication of your data to third parties for commercial purposes;
- receive the call of one of our representatives who will explain the products, services, active offers or promotions dedicated to you and formulate contractual proposals or invitations to contract;
- receive information also on products and services of other companies that we believe may be of interest to you, if those are involved in our projects or are our partners (for example our authorized dealers), provided that you have given specific consent to do so and have not withdrawn it;
- improve our services and receive personalized offers, either to communicate initiatives dedicated to you, to offer you advertising based on your interests (including online advertising based on the use of cookies or advertising), or receiving personalized offers based on your habits and propensities to consume or on your belonging to specific types of families and / or groups.

#### **E) Are you obliged to give us consent for the processing of your data?**

As for the treatments in point D1) if you want us to evaluate your partnership offer, you must give us your consent; otherwise we would not be in a position to provide you with any information, nor to establish any relationship with you.

Regarding the treatments in point D2) your consent is not required; according to the Privacy law their processing can / must be carried out by the Data Controller without the consent of the person concerned.

Regarding the treatments under point D3) consent is optional: if you do not want to receive newsletters, do not want to interact with us on social media and do not want, in any way, to be involved in Vaia promotional campaigns, you are free to deny your consent.

In these cases, without your consent, we will not be able to process your data in accordance with the prohibitions referred to in the GDPR and in the legislative decree n. 185/1999 regarding unwanted communications.

We also inform you that if you have already been our client, you will be able to receive new communications relating to products and services similar to those you already received, subject to your revocation of consent, pursuant to art. 130, 4th paragraph of Legislative Decree 196/2003 as updated by the Legislative Decree 101/2018.

Your consent and your privacy settings are always modifiable, by contacting us at our addresses and by making an explicit request for the removal from our database and the deletion of data concerning you. We remind you that, in the event of revocation, the communication will be immediately processed but will be definitively operational within a maximum of 15 days from receipt, due to technical time for the alignment of all the information systems we use.

#### **F) How do we process your data and how long do we keep them?**

We treat the data that concern you both manually and with IT tools. In any case and, above all, when we treat them with IT tools, we take every security measure to prevent them from being lost, spread, deleted etc.

The period of time may vary depending on the purpose: for example, we will treat the data relating to the product you requested until the order is processed or for related administrative activities, but we will be able to treat some of the acquired data, aggregating them or breaking them down, for statistical purposes or to evaluate our services.

We have the right to keep your data for the time set by the tax regulations or for ten years after the end of our relationship in order to be able to legally protect ourselves; in these cases, however, your data will no longer be accessible to our employees and will be archived separately from the data of current use so that they can be recovered only by those who will be authorized for the aforementioned purposes.

We will process the data for marketing purposes for two years from their registration or longer, in case you continue to purchase our products or follow our initiatives and therefore confirm, in fact, your interest in being updated.

When the processing is based on the User's consent, we can keep your personal data longer, until such consent is revoked.

In any case, you can always revoke your consent and request that you no longer receive any updates on our part, being certain that all communications will cease, since the use of spam is foreign to our policy.

For the same reason, unless otherwise indicated by you, we will abstain from any communication if you have registered, after the release of consent, to the so-called "Register of oppositions".

We take care to reconcile the reciprocal requirements to limit the storage of your data at the strict minimum, and in any case we ensure that your data is accurate by taking all reasonable steps to cancel or promptly correct the inaccurate data.

We have also excluded the processing of your data when the purposes pursued in individual cases can be achieved through the use of anonymous data (such as, for example, in market research aimed at improving services) or by other means, which allow to identify the Data Subject only in case of need or under request by authorities and police forces (such as, for example, traffic data, your stay on the website or your IP address).

At the end of the retention period your data will be deleted, therefore upon expiration of such term the right of access, cancellation, rectification and the right to data portability could no longer be exercised.

### **G) To whom do we communicate your data?**

Your data will only be communicated to the company's staff in charge of managing your requests, of contacting you in case you have expressed interest and willingness to receive further information regarding our products or specific initiatives or, in any case, or involved in the pursuit of the purposes referred to in point D), as well as persons, companies, associations or professional offices, internal and external structures, which carry out on behalf of our company supporting tasks, services, activities of assistance and consulting, services to the Company itself, with particular but not exclusive reference to technological, accounting, administrative, legal, tax and financial matters (in particular: legal services, IT services, shipments, document archiving) and company control.

Access to the data may also be permitted by us, in order to carry out hardware or software maintenance work necessary for the functioning of the portal or for the management of some additional functions, even to external parties which, solely for the purposes of the requested service, could become aware of the interested parties' personal data and who will be duly appointed as Data Processors pursuant to art. 28 of the GDPR. All those to whom your data are communicated are obliged, like us, to treat them according to the provisions of the law.

Outside the cases of communication mentioned above, the data will not be disclosed to third parties except to comply with legal obligations or to respond to legal and judicial requests.

We also inform you that if you choose to pay by PayPal or credit card we will not be aware of your credit card details and / or other economic or financial data that will be processed by the Institutes of payment or other subjects to whom the specific verification and disposition functions are delegated.

We remind you that your personal, economic and financial data may be communicated by such subjects without your express consent pursuant to art. 6 lett. b) and c) of the Regulations, for the purposes referred to in paragraph D) point 1) and 2) to subjects to whom the communication must be made in fulfillment of an obligation established by the law, by regulation or Community legislation, for example in compliance with the obligation to notify the Bank of Italy's Central Credit Register - established with the ICRC Resolution (Interministerial Committee for Credit and Savings) dated 16.05.1962, a centralized information service on financial risk that allows banks

and intermediaries, by collecting from them information regarding their customers' risks, to know any customers' debit positions against the banking system.

In particular, credit institutions, PayPal, or other financial intermediaries involved in the payment transactions to which we communicate your data, in order to better assess credit risk, may share some of your Personal Data with the Financial Intermediation Risk Center (CRIF – "Centrale Rischi d'Intermediazione Finanziaria"), including: personal data, yours and of any co-obligated person; type of contract; credit amount; repayment method. The credit information systems with which they will be able to share your data, are regulated by the relative Code of deontology and good conduct (published in the Italian Official Gazette, General Series of December 23, 2004, No. 300; available on the website [www.garanteprivacy.it](http://www.garanteprivacy.it)).

You can always contact these subjects to find out about the processing methods they performed, the storage times and anything else in your right.

We remind you, in fact, that the subjects indicated above will use the data received for their purposes as autonomous "Data Controllers" and will be responsible for the methods of treatment and the security measures that they must adopt for the management and storage of personal data that concern you.

We do not disclose your data, i.e. we do not make it accessible to an undetermined number of subjects, nor do we disclose it to others for their purposes.

## H) Rights

I remind you that at any time you are entitled to:

- have confirmation of the existence or non-existence of personal data concerning you, even if not yet recorded, and obtain intelligible communication of the data itself;
- obtain the indication of the personal data's origin, of the processing's purposes or methods, as well as of the logic applied in case of treatment carried out with the aid of electronic instruments;
- obtain the list of subjects or categories of subjects to whom the data are communicated or who become aware of it as Managers or Distributors;
- request the update or the correction of processed data and, in case of processing in violation of the law or in the cases referred to in art. 17 of the EU Regulation 2016/679, their cancellation (right to be forgotten), transformation into an anonymous form or their block;
- request the limitation of data processing;
- request, if you are interested, to integrate the data concerning you;
- object, in whole or in part, to the processing of personal data for legitimate reasons, even if pertinent to the purpose of collection;
- object to the processing of personal data provided for commercial or interactive commercial communication purposes and to be informed by the Data Controller, not later than the moment in which the data are communicated or disseminated, of the possibility of exercising this right free of charge;
- have confirmation of the existence or nonexistence of an automated decision-making process, including profiling pursuant to art. 22, par. 1 - 4 of EU Reg. 2016/679, and at least in these cases information on the logic used, as well as on the importance and on the consequences foreseen by such treatments;
- request the portability of the data that concern you to another Data Controller;
- request to be notified in the event of occurrences that may have resulted in a breach of your data, if this has led to a high risk for your rights and freedoms, under the conditions set forth in art. 34 of the EU Reg. 2016/679.

Requests can be sent in paper form to the Controller's office or via email to [info@vaiawood.com](mailto:info@vaiawood.com).

**We remind you that, at any time, you have the right to lodge a complaint with the Italian Data Protection Authority (Garante per la protezione dei dati personali, [www.garanteprivacy.it](http://www.garanteprivacy.it)).**

Consent pursuant to EU Regulation 679/2016