

Holder of the treatment

Dear Sir, Dear Madam, we wish to inform you that the Regulation (EU) 2016/679 and the related supplementary Italian legislation establish rules relating to the protection of individuals concerning the processing of personal data and protect the fundamental rights and freedoms of individuals, and in particular the right to the protection of personal data. According to articles 13 and 14 of the Regulation, we inform you below of the methods and purposes with which the Data Controller will process your personal data. Please read this privacy statement carefully before giving us personal data concerning you or, where requested, consent to their processing.

GENERAL INFORMATION (GDPR - Article 13, Paragraph 1, Letters a, b)

As an interested party (under Article 4, paragraph 1 of the GDPR), we inform you that the relationships established with the undersigned Data Controller involve the processing of personal data in compliance with the following general principles:

- all data are processed in a lawful, correct, and transparent manner towards the data subject, in compliance with the general principles set out in Article 5 of the GDPR;
- specific security measures are observed to prevent the loss of data, illicit or incorrect use, and unauthorized access;
- the Data Controller is the undersigned Company to which it is possible to contact to exercise all the rights provided by articles 15-21 of the GDPR: right of access, rectification, cancellation, limitation, portability, opposition, as well as revoke a previously granted consent or propose a complaint to the supervisory authority to protect personal data.

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1 PURPOSE OF THE TREATMENT (GDPR – Article 13, Paragraph 1, Letters c, d)

Below are your personal data processed to manage the relationship with the interested party; the data can belong to "normal categories" or "particular categories." The basis of lawfulness for processing "normal categories" is the relationship between the data subject and the related legal obligations. It also includes the consent of the data subject or the legitimate interest of the Data Controller.

Article 9 of the GDPR describes the "special categories" where the data subject must give their explicit consent for one or more specific purposes to process these categories of personal data.

Treatment	Data processed	Category
E-Commerce	Commercial agreements	Normal figure
E-Commerce	Name, surname, telephone, email address	Normal figure
E-Commerce	Electronic identification data	Normal figure
E-Commerce	Financial identification data	Particular data
E-Commerce	Residence data	Normal figure
E-Commerce	Personal identification data	Normal figure
E-Commerce	Internet Browsing Log File	Particular data
E-Commerce	Use of the media	Normal figure

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Below are the purposes of the processing of personal data for the management of the relationship with you. Their granting is necessary to fulfill legal and contractual obligations in the legitimate interest of the Data Controller.

Treatment	Purpose
E-Commerce	Customer management

2 SCOPE OF PROCESSING (GDPR – Article 13, Paragraph 1, Letters e, f)

Your data is processed by duly authorized and trained subjects under Article 29 of the GDPR. It is possible to request the scope of external communication of personal data, obtaining precise indications on any external agents who operate as managers or independent data controllers. All data collected will be processed exclusively for the purposes indicated in the table in chapter 1, without prejudice to communications made to fulfill legal and contractual obligations.

The regularly authorized subjects indicated below may process your data. Their processing is necessary to fulfill legal and contractual obligations or legitimate interests of the Data Controller.

Treatment	Authorized subjects
E-Commerce	Customer management

The Data Controller guarantees that your data are not subject to transfer to non-EU countries (*The transfer of personal data from countries outside the EU or the European Economic Area: Norway, Iceland, Liechtenstein is in principle prohibited by Article 25, paragraph 1, of Directive 95/46 / EC unless the country in question guarantees an "adequate" level of protection; the Commission has the power to establish this adequacy through a specific decision*).

Your personal data are not transferred to foreign countries.

Your personal data may be disclosed in the following ways. Their conferment is necessary to fulfill the legal and contractual obligations and legitimate interests of the Data Controller.

Treatment	Diffusion
E-Commerce	They are not subject to dissemination

3 METHOD OF TREATMENT AND STORAGE TIME (GDPR Article 13, Paragraph 2, Letter a)

The processing of your personal data employs the operations indicated in Art. 4 n. 2) GDPR and, more precisely: collection, registration, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, cancellation, and destruction of data, in the following ways:

Your personal data are not subject to automated decision-making processes, including profiling. Your data is stored with the following storage methods:

Treatment	Storage mode
E-Commerce	Internal paper processing or archiving
E-Commerce	Digital processing or archiving on mobile tools (smartphones, tablets, USB sticks, external memories)

Processing of your data will endure as long as the relationship with you and subsequently, for the time indicated below:

Treatment	Retention time
E-Commerce	Commensurate with the purposes and legal obligations

4 RIGHTS OF THE INTERESTED PARTY (GDPR Articles 15, 16, 17, 18, 19, 20, 21, 22)

- The interested party has the right to obtain confirmation of the existence or not of personal data concerning him, even if not yet recorded, and their communication in an intelligible form.
- The interested party has the right to obtain the following indications:
 - the origin of the personal data;

	PRIVACY DISCLAIMER referred to the processing of personal data of E-commerce customers	European Privacy Law EU REG. 2016/679 GDPR, ART.12,13,14
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- b. the purposes and methods of the processing;
- c. the logic applied in case of treatment carried out with the aid of electronic instruments;
- d. the identity of the owner, manager, and the representative appointed under article 5, paragraph 2;
- e. the subjects or categories of subjects that can receive or learn the personal data as appointed representatives in the country, managers, or agents.

3. The interested party has the right to obtain:

- a. updating, rectification or, when interested, integration of data;
- b. the cancellation or transformation into anonymous form or blocking of data processed in violation of the law, including those that do not need to be kept for the purposes for which the data were collected or subsequently processed;
- c. the attestation that the operations referred to letters a) and b) have been brought to the attention, also as regards their content, of those to whom the data have been communicated or disseminated, except in the case in which this fulfillment proves impossible or involves the use of means that are manifestly disproportionate to the protected right;
- d. data portability.

4. The interested party has the right to object, in whole or in part:

- a. for legitimate reasons to the processing of personal data concerning him, even if pertinent to the purpose of the collection;
- b. to the processing of personal data concerning him to send advertising or direct sales material or carry out market research or commercial communication.

5 DATA PROVISION *(GDPR Article 13, Paragraph 2, Letter e)*

The provision of personal data is necessary for all legal and contractual obligations. Therefore any refusal to provide them in whole or in part may make it impossible for the Writer to execute the contract or perform correctly all the responsibilities related to the **relationship with the interested party**.