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PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA PURSUANT TO REGULATION (EU) 2016/679 ("GDPR") – LUCART AWAY FROM HOME DIGITAL APPLICATIONS

	Who is the Data Controller?	**Lucart S.p.A.** Via Ciarpi, 77 - 55016 Porcari (LU) - Italy VAT and Tax Identification No. 00145780466 (hereinafter also the "Controller")

	What is meant by personal data?	**What ordinary personal data do we request from you?**	**What special categories of personal data do we request from you?**
	Any information relating to an identified or identifiable natural person.	Identification and professional details (first name and surname, business or company affiliation, if any, and professional role), contact details (email address, telephone number), technical data (log files, including the connection IP address).	None.

	For what purposes do we process these data?		**What is the legal basis for these processing activities?**		**For how long do we process your data?**
1. To register the user with Lucart ID and enable agents and distributors to use the Controller's digital applications within the framework of their contractual relationship with Lucart S.p.A., including access to the restricted areas of the Controller's brands.		Article 6(1)(b) GDPR - Performance of a contract to which the data subject is party and the taking of pre-contractual steps, for user registration and the provision of the applications.		Personal data relating to each account, as well as personal data entered by the registered user when using the Controller's digital applications, are retained for a maximum of 12 months from the data subject's last access to the Lucart ID account (login), without prejudice to the data subject's right to object to processing in the circumstances and in accordance with the procedures laid down in Article 21 GDPR. Upon expiry of this period, inactive accounts are deleted and personal data are deleted or anonymised.
2. To verify and approve requests for access to the sales tool, in order to prevent unauthorised access or unlawful use and protect the Controller's information assets and industrial property rights.		Article 6(1)(f) GDPR - The Controller's legitimate interest in protecting its intangible assets (e.g. registered trade marks, product databases).		Data relating to access requests and approvals are retained for the duration of the contractual relationship and, thereafter, for the period necessary for the establishment, exercise or defence of any legal claims, in accordance with the applicable limitation periods.
3. Management of the Lucart ID user account and IT security.		Article 6(1)(f) GDPR - The Controller's legitimate interest in ensuring the security of IT systems, applications and access thereto.		Log data and connection IP addresses are retained for 30 days, except in the event of anomalies or security incidents.
Upon expiry of the above retention period, the data you have provided will be deleted or anonymised.					

	Why do you provide your data to the Controller?
	The data requested are necessary to achieve the purposes set out above, and their provision is a mandatory requirement for access to the digital applications. If such data are not provided, the Controller will be unable to grant access to the digital applications. The data subject may, at any time, exercise the right to object to the processing of personal data concerning them by submitting a specific request using the contact details provided below. The service is reserved exclusively for persons of legal age. The Controller reserves the right to deny access to unauthorised persons.

	**To whom do we disclose your data?**
	The data are processed on behalf of the Controller by external parties appointed as processors pursuant to Article 28 GDPR that carry out specific activities (e.g. consultancy firms, IT service providers).
	The data are disclosed to external parties acting as independent controllers (e.g. supervisory and oversight authorities and bodies and, in general, public or private entities legally entitled to request the data, and law firms).
	A complete and up-to-date list of recipients may be requested from the Controller using the contact details provided.

	**Who is authorised to process the data?**
	The data are processed by employees of the corporate functions responsible for carrying out the activities described above, who are authorised to process the data, have received appropriate operational instructions and are bound by confidentiality obligations.

	**Do we transfer your data outside the European Economic Area?**
	The data will not be disseminated or transferred outside the European Economic Area.

	**Who is the Data Protection Officer (DPO)?**
	The Controller has appointed a Data Protection Officer ("DPO") pursuant to Article 37 et seq. of the GDPR. The DPO may be contacted by email at: dpo@lucartgroup.com

	**What are your rights and how can you exercise them?**
	By contacting the Controller by email at privacy@lucartgroup.com, data subjects **may request** from the Company access to, rectification or erasure of their personal data. They also have the right to restriction of processing in the circumstances set out in Article 18 GDPR, and to object to the processing of personal data concerning them where such processing is based on the Controller's legitimate interests.
	Data subjects have the right to **lodge a complaint** with the competent supervisory authority of the Member State in which they reside or work, or of the Member State in which the alleged infringement occurred.
	For further information about your rights, please visit the following page (https://www.garanteprivacy.it/home/diritti/come-agire-per-tutelare-i-tuoi-dati-personali#:~:text=Ogni%20persona%20pu%C3%B2%20tutelare%20i,posta%20elettronica%2C%20ecc).