

## Information Statement provided pursuant to article 13 of the General Data Protection Regulation EU 679/2016 General Data Protection Regulation

This page describes the procedures on the Web App “handles.zone” with particular emphasis on personal data processing of users who use the App. This information statement is also provided pursuant to article 13 of the General Data Protection Regulation EU 2016/679 to those who interact with web services of the platform that can be accessed online from the website: <https://www.handles.zone>, which is the initial page of the application. Moreover, it must be noted that this document is published at the web address <https://www.handles.zone/doc/PrivacyPolicy-HandlesZone-EN.pdf>, constituting the Privacy Policy Statement of this platform and is subject to revisions.

### Identity and contact data of the Data Controller

The Data Controller is Giusti S.p.A. with head office located in Via Canova, 10 – 37053 Asparetto di Cerea (VR).  
Tel: +39 0442 83455, e-mail: [gdpr@giustiwings.it](mailto:gdpr@giustiwings.it)

### Types of processed data

#### Cookies and browsing data

The Web App handles.zone does not use cookies and Giusti S.p.A. does not keep track of any browsing data.

#### Data provided voluntarily by the user

- A) While consulting the product catalogue in the Web App, the user has the right to request information on products directly to the relevant Re-seller. By selecting the envelope icon, a pre filled-out form is generated containing the specifications of the product of interest, as well as some fields to acquire identification data of the user (email address, name and surname, telephone number) and business name of the company which even if optional are strictly necessary to fulfil the requests of the user.  
Giusti S.p.A. will not be held liable for any improper use of the data provided voluntarily by the user, as it is processed exclusively by the relevant Distributor which in turn undertakes to comply with data protection standards in force in the place where it operates.
- B) Moreover, the user (natural person or company) has the right to create an account in the platform “handles.zone” exclusively by providing an email address and by setting up a password. The purpose of said feature is to preserve the data of the account and the list of preferred products by the user in the website.

#### Purpose of data processing

Thanks to the platform handles.zone, our company uses technical mechanisms to get some useful information to identify the products of the catalogue that draw the most interest from customers with the ultimate purpose of making statistics, strictly in aggregated form that can manage and optimise the production and organisational processes of the company.

The personal data gathered is processed for the following purposes:

- A) To fulfil the requests of users. It must be noted that the data provided for these purposes are processed exclusively by the relevant Distributor and Giusti S.p.A. does not have any visibility over them whatsoever.
- B) To allow registered users to store desired items in their accounts. For this purpose, the data of the user will be preserved exclusively in the Web App owned by Giusti S.p.A. and will not be subject to profiling through the use of automated decisional tools.
- C) The data specified in letter B may be used to email registered customers to inform them on any updates of the catalogue, including pictures of the products.
- D) The same data specified in letter B will be processed by Giusti S.p.A. in aggregated form only and for statistical purposes to increase focus on the product offer.

#### Legal basis for personal data processing

For purposes of letter A, as the data sent by the user by email will be processed exclusively by the Distributor, consult the information statement provided by the latter.

For purposes of letter B, the data is processed exclusively to render the services.

For purposes of letter C, the data is processed after receiving a consent voluntarily granted by the Data Subject.

For purposes of letter D, the legal basis is not required as the data is processed in aggregated form only and is by no means associated to the user.

## **Recipients or categories of recipients to whom the personal data can be disclosed**

The personal data gathered can also be processed by personnel authorised by Giusti S.p.A., acting based on specific instructions provided in regards to the purposes and manners of such data processing.

The data may be disclosed to companies of the Group or to authorised persons only if required and only for the above purposes.

Moreover, the data can be disclosed to persons who have the right to access such data pursuant to law or regulations. The data may not be disseminated in any way.

## **Transfer of data to third countries or international organisations**

The personal data is kept in servers located within the EU and is never transferred to countries outside the EU for any reason whatsoever.

## **Personal data processing methods and preservation period**

The data is processed lawfully according to principles of correctness in compliance with the security obligations set out in the General Data Protection Regulations EU 679/2016. Data is processed using computer and electronic tools with logics that are strictly associated with the same purposes and in any case, in such a manner to as to guarantee the security and confidentiality of the data. In no event are automated decisional processes used, including profiling pursuant to article 22, paragraphs 1 and 4 of the General Data Protection Regulation EU 679/2016.

The purposes on letter A do not require processing by Giusti S.p.A., let alone the preservation of said data.

The data gathered for purposes in letter B will be processed for the time strictly necessary to fulfil the request and subsequently preserved until the account is cancelled by the Data Subject.

For purposes of letter C, the data will be preserved until the consent is withdrawn.

The purposes of letter D do not require the preservation of data, only data in aggregated form is preserved and is not associated with the user in any way.

## **Rights of the Data Subjects**

As per the cases set out in article 15 and subsequent articles of the GDPR, Data Subjects have the right to obtain from the Data Controller the rectification, access and erasure of the data, as well as the limitation of the processing of data concerning them or the right to object to the processing. Moreover, Data Subjects who have granted their consent for purposes outlined in letter C, may withdraw their consent at any time.

To exercise own rights, Data Subjects must address their requests to the Data Controller by e-mail: [gdpr@giustiwings.it](mailto:gdpr@giustiwings.it).