

WEBSITE PRIVACY POLICY

a) ***What is the purpose of this notice?***

In compliance with the provisions of the current legislation on the protection of personal data, specifically the EU Regulation 2016/679 (commonly known as the "GDPR"), and, where applicable, supplementary national regulations, we wish to inform you about the processing of your personal data by the Data Controller's organization. This processing will adhere to the principles of fairness, lawfulness, and transparency, as well as the protection of your privacy and rights. This notice is provided for the personal data you have provided, i.e., the data subject reading this notice.

b) ***When do we collect your data?***

This notice is provided for the personal data you provide when using the website.

c) ***Who is the Data Controller? How to contact him or her?***

The Data Controller is Balsamo S.r.l. with its registered office in Piazza Pieve, 1D - 24060 Casazza - BG, C.F./P.IVA 04274420167, hereinafter the "Data Controller". You can contact The Data Controller at the following postal address or email address: privacy@balsamo.care.

d) ***For what purposes is data processed? On what legal basis? And how long is data stored?***

Below we tell you the purpose of the processing, the legal basis that legitimizes the processing, and the retention time of your personal data:

<i>Purposes</i>	<i>Legal basis</i>	<i>Retention</i>
1. Contract management , or a request related to it (also through chat or email) for information or services, and the corresponding contractual and/or pre-contractual relationships.	Execution of pre-contractual or contractual obligations.	Data will be retained for no longer than the period of the contractual relationship and the subsequent period of prescription of rights.
2. Sending newsletters , only based on your specific request for subscription, with the option to unsubscribe at any time.	Execution of contractual obligations.	The data will be kept until you request to unsubscribe from the newsletter.
3. Fulfillment of legal obligations , to satisfy any legal obligations that the Data Controller is required to adhere to.	Fulfillment with legal obligation.	Data will be kept for the retention period required by tax and/or accounting regulations.
4. Website management , including the evaluation of service functionality, website usage, web page utilization, and the processing of statistical data.	Legitimate interest	The data will be kept until you object (according to the limits indicated in the section " <i>What are your rights as a data subject</i> " below), and with regard to cookies and similar tools used, the retention periods are indicated in the cookie policy.

<p>5. Direct marketing, promotional activities, sending advertising materials using traditional means (mail, telephone, etc.) and/or electronic tools (email, social media, SMS, push notifications, online advertising, etc.). This processing will only be carried out with your specific and explicit consent, which will be requested at the time of data collection for this specific purpose. In the absence of your explicit consent, processing for this purpose will not be conducted.</p>	<p>Revocable consent at any time</p>	<p>Data will be retained until opposition, request for deletion, or withdrawal of consent.</p>
<p>6. Profiling of your habits and behaviors for the purpose of conducting personalized direct marketing activities, to provide you with products and services that meet your needs and genuine interests using traditional means (mail, telephone, etc.) and/or electronic tools (email, social media, SMS, push notifications, online advertising, etc.). This processing will only be carried out with your specific and explicit consent, which will be requested at the time of data collection for this specific purpose. In the absence of your explicit consent, processing for this purpose will not be conducted.</p>	<p>Revocable consent at any time</p>	<p>Data will be retained until opposition, request for deletion or withdrawal of consent. In any case, the retention period of profiling data collected through cookies or similar tools is indicated in the cookie policy.</p>

e) ***What is the legitimate interest that allows the processing?***

Regarding the legitimate interests mentioned above, they relate to the Data Controller's need to improve the user's enjoyment of the site and its effectiveness. This interest is without prejudice to your fundamental freedoms and rights.

f) ***Is it mandatory to provide the data? What happens if you do not provide it?***

The provision of your personal data for the purposes of (1) Contract Management and (2) Sending Newsletters is a requirement for the conclusion of the contract and the provision of the requested services. The provision for the purpose of (3) Compliance with legal obligations is mandatory to comply with the legislation. Failure to provide for these three purposes will result in the impossibility of concluding the contract or providing you with the services you requested; for the purpose (4) Site Management, the provision is necessary for the pursuit of the indicated legitimate interest, however, in case of failure to provide the service, it may degrade or we may not be able to improve it; for the purposes of (5) Marketing and (6) Profiling, the provision is optional and in case of failure to provide your personal data and your lack of consent, this means that we may not be able to provide you with generalized promotional communications or information - for Marketing - or profiled and adapted to your real interests - for Profiling.

g) ***Who can know your data? To whom do we disclose it?***

Personal data related to the processing in question, for the above purposes, may be communicated or disclosed to:

- **Authorized:** to those within the Data Controller's organization who need it because of their job or hierarchical position. These individuals are authorized to process under the direct authority of the Controller.
- **Autonomous Controllers:** to those subjects to whom the provisions of the law give the right of access, that is to say the ones to whom the transfer of data is necessary for the fulfillments required by laws or regulations, by contract, such as, for example, banks, transporters, lawyers, auditors,

- **Responsible parties:** to third parties who carry out processing on behalf of the Data Controller, related to the processing and purposes described above, such as, for example, administrative, accounting, tax, information system management services. These subjects appear to be authorized to process it as Data Processors according to the provisions of Article 28 of the GDPR,
- **Group Companies:** Companies that are part of the same Corporate Group as the Data Controller within the EU that appear to be authorized to process them for internal administrative purposes.

h) *Is personal data transferred outside the European Union (EU)?*

Some data collected may be transferred abroad to locations outside the European Union. However, such transfer will be carried out in accordance with the safeguards prescribed by the GDPR for this type of activity (Articles 45 to 49). Including: transfer to companies located in countries for which it is recognized that there are data protection guarantees comparable to those of the GDPR (White List countries); or to companies with which specific contractual data protection clauses approved by the Data Protection Authority or binding business rules approved by the Data Protection Authority have been signed, or the transfer is made under specific exemptions. For more information you can contact the Data Controller as indicated in the point below titled "*What are your rights as a data subject*".

i) *What are your rights as a data subject?*

The GDPR grants you the following rights in relation to your personal data, which you may exercise to the extent and in accordance with the provisions of the legislation:

- Right of access to your personal data (Art. 15),
- Right to rectification (art. 16),
- Right to erasure (right to be forgotten) (art. 17),
- Right to restriction of processing (art. 18),
- Right to data portability (art. 20),
- **Right to object (Art. 21);** The data subject has the right to object at any time, on grounds relating to his or her particular situation, to the processing of personal data concerning him or her based on legitimate interest, including profiling on the basis thereof. The Data Controller shall refrain from processing unless it can demonstrate compelling legitimate grounds for processing that override the interests, rights and freedoms of the data subject or for the establishment, exercise or defense of a legal claim,
- Right to object to a decision based solely on automated processing (Article 22),
- Right to revoke, at any time, the consent given, without affecting the lawfulness of the processing based on the consent given before revocation.

You may exercise these rights by sending a written request addressed to the Data Controller's contact at the postal address or by e-mail as indicated above. In addition, you have the right to lodge a complaint with the Data Protection Authority (www.garanteprivacy.it), if you believe that the processing of your data is contrary to the current legislation (Art. 77) or to take legal action (Art. 79).

j) *How is personal data protected?*

Personal data will be processed both by electronic and non-electronic means, using technical and organizational security measures appropriate to the nature of the data to ensure its integrity and confidentiality and protect it against the risks of unlawful intrusion, loss, alteration, or disclosure to third parties not authorized to process it.

k) *Cookies and other disclosures*

Specific disclosures are provided for special processing:

- **Cookies:** when you connect to the Data Controller's website, a series of cookies (or similar tools) are installed on your connecting device to facilitate your use of the site or to define your user profile. For more information about cookies, to know their characteristics and to exercise your right to accept them in full or to express your preferences to their use, we invite you to consult our "**cookie policy**" found in the footer of this site.
- **Candidates:** if applications are sent through the site, you should refer to the specific notice provided present on this site.

1) *Updates*

The Owner reserves the right to change and update this policy at any time. Changes will apply as of their appearance. It is therefore necessary for you to regularly check the current Policy.

Edition dated **June 13, 2023**