

Privacy policy on personal data processing for all the subjects with which the Data Controller liaises in the course of informal dealings or occasional business/institutional dealings (e.g. exchange of business cards).

Thank you for supplying your personal data to stay in touch with A.N.C.I. Servizi s.r.l. a socio unico and Assocalzaturifici. We hereby inform you that the data supplied will be processed in accordance with European Regulation 2016/679 ("GDPR") and with national legislation in force ("Data Protection Code" - i.e. Italian Legislative Decree 196/03 as amended by Italian Legislative Decree 101/2018). The joint controllers, within the meaning of art. 26 GDPR, are **A.N.C.I. Servizi S.r.l. a socio unico** and **Assocalzaturifici** (hereinafter only "Joint Controllers"), both with registered offices in Milan, Via Alberto Riva Villasanta 3, which may be contacted by: Tel +39 02438291; e-mail info@assocalzaturifici.it. The DPO is attorney Laura Marretta, whom you can contact by writing to the email address privacy@assocalzaturifici.it.

As required by art. 12 of the GDPR, the Joint Controllers have adopted this Privacy Policy to provide the data subject with the information set forth in art. 13 of the GDPR and the communications set forth in artt. 15 to 22 of the GDPR. Therefore, in relation to the above, the Joint Controllers hereby inform you that the personal data supplied - not belonging to the special categories of personal data listed in article 9 of the GDPR - concerning the data subject himself/herself (including if operating as an individual undertaking, small business person or professional) or his/her employees, agents, representatives or collaborators (the "Data"), shall be processed in accordance with the GDPR and the Data Protection Code and in accordance with the principles relating to the processing of personal data described in article 5 of the GDPR (i.e. the principles of fairness, relevance, transparency, adequacy, protection of confidentiality and rights, etc.). Data is processed, in line with the principles of lawfulness provided for under art. 6 of the GDPR, for purposes relating to the relationship established with the Joint Controllers; therefore, data processing is legally justified, as required by art. 13 c) of the GDPR, by the purposes for which the relationship is established with the Joint Controllers namely, in this case, the supply of your data to stay in touch with the Joint Controllers (art. 4, paragraph 11 GDPR - consent through a clear affirmative action).

In the light of this purpose, data processing will include, *inter alia*, managing, organising, using in the EU or outside the EU (countries falling within art. 45 and 46 GDPR), storing, creating databases, consulting, recording, notifying future initiatives, processing, modifying, light marketing through soft spam (against which an objection can be raised at any time under art. 130, paragraph 4 of the Data Protection Code through the "unsubscribe" button in the footer of the emails you will be sent), soft marketing through communications regarding also all our physical and digital trade fairs related to footwear that will be held in EU and extra-EU countries (legal basis: legitimate interest - you can object by writing to the DPO or by following the instructions indicated in the footer of the emails), anonymous statistics, destroying or amending processed data at the data subject's request, communicating data to the members of the Joint Controllers' organisational structure or to their consultants in the course of their business management.

Data may be processed both in paper form and/or electronically only by parties specially authorised to do so. The Joint Controllers do not process data by means of an automatic decision-making process and profiling does not produce effects based solely upon it.

The Data Controller recalls that data have been spontaneously provided according to your express intention to stay in touch with us.

Data will be stored for ten years for administrative purposes and in any case for the time required to fulfil the purposes of the collection.

The Data Controller also informs you that the following rights are guaranteed under art. 13, para. 2, of the GDPR:

- The right of access to personal data and to related information as listed under art. 15 of the GDPR;
- The right to correct or delete the data supplied, or request limitation of data processing;
- The right to object to data processing;
- The right to data portability;
- The right to revoke your consent at any time without affecting the lawfulness of data processing on the basis of consent given prior to revocation, if processing is based on article 6, paragraph 1, letter a), or article 9, paragraph 2, letter a);
- The possibility to make a complaint to a controlling authority.

To exercise the rights listed above or obtain more information in this respect, simply email privacy@assocalzaturifici.it, stating the wording "Exercising of rights under the GDPR" in the subject line and specifying the right that you wish to exercise in the body of the email, along with your name, surname and the email address where you wish to receive the reply from the Joint Controllers. Once your request has been processed, the Joint Controllers will send their feedback in the terms set forth in article 12(3), of the GDPR.

The Joint Controllers inform you that the rights listed in and guaranteed by artt. 15-22 of the GDPR may not be exercised by submitting a request to the Data Controller or by lodging a complaint under art. 77 of the GDPR if exercising same could cause real, concrete injury to certain data categories and/or to certain activities as listed in art. 2-*undecies* of the Data Protection Code; this does not prejudice the provisions specified in paragraphs 2 and 3 of the aforementioned article.

Should the Joint Controllers intend to process personal data for a purpose other than that for which it was collected, the data subject will be provided in advance with information on this new purpose and all other pertinent information, and the Joint Controllers will seek his or her prior consent.