



STATEMENT ON PERSONAL DATA PROCESSING

Commercial relationship management, administration and business promotion

Consorzio Vacche Rosse S.C.A.

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12/05/2025

DATA CONTROLLER

The data controller is **Consorzio Vacche Rosse S.C.A.**, VAT Number: IT01463760353, established in Via F.lli Rosselli 41/2 42123 Reggio Emilia (RE) - ITALY, e-mail address: info@consorziovaccherosse.it (from here also "Data controller" o "Controller").

PURPOSES OF PROCESSING	LEGAL BASIS
<p>A. To carry out commercial and information requests received in order to establish a commercial partnership;</p> <p>B. To perform contractual agreements, to carry out pre-contractual needs and to manage the service provision;</p> <p>C. To manage the administration dependent to commercial relationship;</p> <p>A. To manage disputes with partners;</p> <p>D. To perform business promotional activities (as sending advertisement material and completing market researches) directly to data subjects.</p>	<ul style="list-style-type: none">• To the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract - <u>Purposes A. and B.</u>• Attempt to legal obligations - <u>Purpose C.</u>• Legitimate interest of Data Controller, consisting in the:<ul style="list-style-type: none">○ management of litigations - <u>Purpose D.</u>○ business promotion, performing marketing activities with <i>Soft Spam</i> modalities - <u>Purpose E.</u>• Explicit consent of data subjects To carry out promotional activities, send advertising material and complete market researches directly to the data subject (in way different by <i>Soft Spam</i>).

DATA PROCESSING METHODS

The personal data processing activities to achieve the aforesaid purposes are performed in compliance with the European law on personal data protection (GDPR) and subsequent amendments and additions.

The processing will be also performed with IT, papery and telematics means able to guarantee the effectiveness, the security and entirety of data processing, adopting the relevant security measures congruent to the risk caused by processing activities.

The data controller will process only the personal data required to manage the communication with data subjects, to satisfy specific forwarded requests, to provide the agreed services (identification data, contact details and postal address, etc.), and to perform the administrative management of commercial relationship and fulfill legal obligations..

The marketing activities may be developed by data controller with methods that won't affect in any way the rights and the freedoms of data subjects, taking in account their reasonable expectations.

The promotion activities performed with *Soft Spam* modalities will be carried out regardless of data subject's explicit consent, as far as the communications have the following features:

- the activity consists in sending e-mails to recipients which already have entertained commercial relationship with **Consorzio Vacche Rosse S.C.A.** and the e-mail addresses have been communicated to manage the business relations;
- the content is related to products or services related to those which recipient has already purchased;

However, data subject has the faculty to exercise his rights, opposing or limiting the processing activities. Those rights might be exercised when personal data are collected or whenever a message with marketing purposes will be delivered from data controller.

The other processing executed pursuing the business promotion and marketing purposes which diverge by *soft spam* will be performed if data subject provides an explicit consent to the data subject.

The processing activities may change according to the services requested and more information concerning data processing methods are available on request from the data controller.

DATA PROVISION AND CONSEQUENCES OF REFUSAL TO PROVIDE THE DATA

The provision of personal data might be, depending on which purposes the personal data are collected for:

- mandatory, if data submission is required to attempt to legal obligations; the denial to provide those information will result in our inability to fulfill the obligations signed up in commercial and contractual relations; Purposes A., B., C. and D.
- conditioning, if data submission is required to perform contractual agreements, to carry out pre-contractual requests or to provide the service; the denial to provide those information will affect the ability to manage properly our commercial relationship and the services provision;
- optional for what concerns the activities to carry out marketing and business promotion; Purpose E.

PERSONAL DATA COMMUNICATION AND TRASMISSION OF DATA TO THIRD PARTIES

The recipients or categories of recipients of the data are possible:



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- post office or other delivery companies;
- banks, credit institutions, debt collection companies and insurance firms;
- law and debt collection firms;
- companies that provide maintenance/repair services of IT equipment;
- professional firms, companies and consultants who perform business consultancy, processing or other technical and specialized services;
- professional firms, companies, associations of companies and/or entrepreneurs who provide us certain services, such as accounting, tax service, etc.
- companies that manage datacenter, database and application software;
- public bodies and administrations;
- companies and entities performing, on our behalf, marketing and promotion activities of our business and our products.

More information concerning the third parties who may be able to access your personal data are available on request from the data controller.

DATA RETENTION

Personal data collected within commercial relations will be stored in our partners databases for the period strictly necessary to achieve the data processing purposes for which those data have been collected, as following described.

Business relations and administration management

- if business relationship successfully went through, data will be stored for the period of 10 years after the relationship end, although data might be stored for a longer period of time to attempt legal obligations or to manage disputes;
- if business relationship didn't go through, data collected to carry out pre-contractual needs will be stored at most 3 years after their collection.

Promotion and marketing activities management:

- if the recipient of promotion activities is already our partner, the data retention period will be the same as for business and administrative management (10 years after business relation end); however data subject may always exercise his rights to prevent data controller to further perform this data processing activity;
- if data processing has as legal base the explicit consent of data subject, data will be stored until the revocation of your explicit consent, however data subject may always exercise his rights to prevent data controller to further perform this data processing activity.

DATA SUBJECT'S RIGHTS

We inform you about the existence of your rights, particularly to request **access** to your personal data, **rectify and cancel** them, **restrict the data processing** concerning yourself, **object** to their further processing, **data portability** (Articles 15 to 22 of the EU Regulations 2016/679 GDPR).

To request more information, to exercise your rights and get acknowledge about third parties to whom data may be shared with, you can write to the following e-mail address: **info@consorziovaccherosse.it**.

If the data processing has his foundation on your explicit consent (art. 6, § 1, lect. a), you have the right to revoke this consent whenever you want, without to prejudice the lawfulness of previous processing activities.

In order to facilitate the detection of your requests about your rights, we suggest specifying in the e-mail subject the following statement: "Request to exercise a data subject right".

Within the communication it's important to clarify your identity, the type of your relationship with the Data Controller, the right you're asking to exercise and all the further information useful to identify the data or the processing involved in your requests. You can also use the form provided by the Italian Supervisory Authority available at the following link: <https://www.garanteprivacy.it/home/modulistica-e-servizi-online>

You are entitled to file your complaints with the Italian control authority at the Supervisory Authority address for the protection of personal data, by sending a certified e-mail to the address protocollo@pec.gpdp.it or a registered letter addressed to: Piazza Venezia 11, 00187 Roma (Italy), or with the control authority of another EU member country.

Reggio Emilia, _____

Document updated on: 5/12/2025

Consorzio Vacche Rosse S.C.A.
(Data controller)



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DATA SUBJECT'S EXPLICIT CONSENS COLLECTION

customer or potential customer - business promotion and marketing processing activities

Dear Consorzio Vacche Rosse S.C.A.,

I signed _____

- in my name
 on behalf of the company _____

in compliance with the European General Data Protection Regulation (GDPR), I declare that in a free, informed and specific, unequivocal wise I provide my

- consent lack of consent

to Consorzio Vacche Rosse S.C.A. to perform data processing activities concerning business promotion and marketing activities (as sending advertising material and completing market researches) directly to data subject.

_____, _____

(Data subject)