

DISCLOSURE ON THE PROCESSING OF PERSONAL DATA	
LAST REVISION DATE: 25 MAY 2018	
Introduction	<p>This disclosure on the processing of personal data (hereinafter, the "Disclosure") is provided pursuant to Art. 13 of EU Regulation 679/2016 (<i>General Data Protection Regulation</i>, hereinafter, the "GDPR").</p> <p>The Disclosure provides detail as to how and for what purposes your personal data will be processed during your navigation on the website www.sparco-official.com (hereinafter, the "Site") and the use of the various functions and services made available within it, including the eCommerce platform.</p> <p>For the purposes of this Disclosure, the term "you" (and the adjective "your") will identify the user of the site and its functions/services, as the data subject to whom the personal data processed refer.</p>
A) Data Controller	<p>The data controller of your personal data is Sparco S.p.A. (hereinafter, the "Data Controller").</p> <p>It is possible to contact the Data Controller, for any question, request or clarification related to this disclosure or in general as regards the processing of your personal data, at:</p> <ul style="list-style-type: none"> - e-mail address (indicating "Privacy" in the subject line): privacy@sparco.it - physical address: registered office in Volpiano (TO), via Leini no. 524
B) Categories of personal data processed	<p>The Data Controller handles the following categories of personal data while you browse the Site and use its related functions/services:</p> <ol style="list-style-type: none"> a) information and data relating to your browsing on the Site (such as information about the pages and sections of the Site visited, your activities on the Site, time spent on individual pages and sections of the Site, etc.); b) information and data relating to the devices you use to browse the Site and use its functions and services (such as IP address, browser used, type of device used, data relative to your geographical position (only on the condition that you have previously consented to such processing), information from cookies or similar tools issued by Site pages; c) if you intend to register or have already registered in the reserved area of the Site called the "Account" (hereinafter, the "Reserved Area"), personal data requested for the purpose of creating an account (e-mail address and password), in addition to other data that can be entered in the Reserved Area (name, surname, date of birth, billing and shipping address, and VAT number, if applicable) and information relating to the activities performed by you on the Site once you have logged in (such as the use of services reserved for registered users), or within the Reserved Area; d) if you intend to conclude a commercial transaction in the "eCommerce" section of the Site, personal data and information relating to the transaction (such as identification data, contact details, delivery data for shipment, payment data, billing data if this option has been selected); e) your e-mail address as indicated when finalising the commercial transaction on the Site, for sending communications (newsletters) on news, promotions and offers related to the products or services involved in the transaction, or similar products and services; f) if you wish to contact the Data Controller by filling out the appropriate form in the "Contact Us" section of the Site (or by sending communications to contacts of the Data Controller on the Site), personal data and information required to send the contact request and manage your message (name, surname, e-mail address for response, in addition to the content of the information or requests you have sent); g) if you intend to receive communications of a commercial nature from the Data Controller (such as newsletters), subject to express consent, by ticking a relative box, your contact details (such as e-mail address); h) if you participate in surveys, questionnaires, market research and general statistical surveys offered by the Data Controller or third parties, subject to the provision of your express consent by ticking a special box, your contact details (such as e-mail

	<p>address) and the information/preferences that emerged as part of the investigations conducted;</p> <p>i) in the event of your participation in communication initiatives or prize events promoted by the Data Controller through the Site, identification data (such as name and surname), contact information (such as e-mail address, telephone number) and delivery information (such as physical address) as required to allow your participation and potential management of the winning/selection phase;</p> <p>j) if you make use of the interaction between the contents of the Site and your profiles on social networks (such as "like" and "tweet"), data and information relating to such profiles will also be processed.</p>																			
	<p>The personal data referred to in categories (a) and (b) are automatically collected by the Data Controller during your navigation on the Site. Personal data pertaining to all other categories are provided directly and voluntarily by you.</p>																			
<p>C) Consequences of the failure to provide personal data</p>	<p>The processing of personal data in categories (a) and (b) of the previous section is necessary for the Data Controller in order to guarantee the best possible browsing experience, as well as provide you with all of the functions and services provided through the Site. However, it is possible to limit the processing of such personal data through the use of certain features made available on the Site (with particular reference to the transmission of cookies or similar instruments, please refer to the Cookie disclosure on the Site) or from your device or browser/navigation application. In such case, navigation on the Site may be limited, and some of its functions/services may not be accessible.</p> <p>The processing of personal data in categories other than (a) and (b) as contained in the previous section is necessary for the fulfilment of contractual obligations (such as to allow you to access and use specific functions/services of the Site, such as the Reserved Area) and legal obligations (with reference to the execution of regulatory obligations to which the Data Controller is subject). You therefore are obligated to provide such personal data in order to use the services and functions of the Site, as periodically requested.</p> <p>If the above data is not provided, it will not be possible for the Data Controller to provide the functions and services of the Site that you have requested.</p>																			
<p>D) Processing purposes and related legal grounds</p>	<p>Your personal data will be processed for the following purposes and pursuant to the following legal grounds.</p>																			
	<table border="1"> <thead> <tr> <th data-bbox="472 1294 539 1321"></th> <th data-bbox="545 1294 1091 1321">Purposes</th> <th data-bbox="1098 1294 1410 1321">Legal grounds</th> </tr> </thead> <tbody> <tr> <td data-bbox="472 1326 539 1447">1.</td> <td data-bbox="545 1326 1091 1447">To allow browsing on the Site, access to its pages and sections, use of its functions and services (including interactions with social network profiles)</td> <td data-bbox="1098 1326 1410 1447">Processing required on contractual grounds (Article 6(i)(b) of the GDPR)</td> </tr> <tr> <td data-bbox="472 1451 539 1572">2.</td> <td data-bbox="545 1451 1091 1572">To allow your registration for the Reserved Area, and the use of the services offered to registered users</td> <td data-bbox="1098 1451 1410 1572">Processing required on contractual grounds (Article 6(i)(b) of the GDPR)</td> </tr> <tr> <td data-bbox="472 1576 539 1720">3.</td> <td data-bbox="545 1576 1091 1720">To allow the execution and finalisation of commercial transactions in the appropriate areas of the Site, and consequently manage each phase of the transaction (acceptance of payment, any shipment of products or supply of services)</td> <td data-bbox="1098 1576 1410 1720">Processing required on contractual grounds (Article 6(i)(b) of the GDPR)</td> </tr> <tr> <td data-bbox="472 1724 539 1908">4.</td> <td data-bbox="545 1724 1091 1908">In the event that transactions are carried out on the Site, to allow the Data Controller to keep accounting records and comply with the relative obligations as regards accounting, tax and administrative matters (such as that pursuant to Article 2220 of the Italian Civil Code)</td> <td data-bbox="1098 1724 1410 1908">Processing required to fulfil the legal obligations to which the Data Controller is subject (Article 6(i)(c) of the GDPR)</td> </tr> <tr> <td data-bbox="472 1912 539 2056">5.</td> <td data-bbox="545 1912 1091 2056">To respond to your contact requests or provide information by interacting with the "Contact Us" section of the Site (or by sending communications to contacts of the Data Controller on the Site)</td> <td data-bbox="1098 1912 1410 2056">Processing required on contractual grounds (Article 6(i)(b) of the GDPR)</td> </tr> </tbody> </table>		Purposes	Legal grounds	1.	To allow browsing on the Site, access to its pages and sections, use of its functions and services (including interactions with social network profiles)	Processing required on contractual grounds (Article 6(i)(b) of the GDPR)	2.	To allow your registration for the Reserved Area, and the use of the services offered to registered users	Processing required on contractual grounds (Article 6(i)(b) of the GDPR)	3.	To allow the execution and finalisation of commercial transactions in the appropriate areas of the Site, and consequently manage each phase of the transaction (acceptance of payment, any shipment of products or supply of services)	Processing required on contractual grounds (Article 6(i)(b) of the GDPR)	4.	In the event that transactions are carried out on the Site, to allow the Data Controller to keep accounting records and comply with the relative obligations as regards accounting, tax and administrative matters (such as that pursuant to Article 2220 of the Italian Civil Code)	Processing required to fulfil the legal obligations to which the Data Controller is subject (Article 6(i)(c) of the GDPR)	5.	To respond to your contact requests or provide information by interacting with the "Contact Us" section of the Site (or by sending communications to contacts of the Data Controller on the Site)	Processing required on contractual grounds (Article 6(i)(b) of the GDPR)	
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	6.	Receive communications of a commercial nature from the Data Controller	Processing put into place with the prior consent of the data subject (Article 6(i)(a) of the GDPR)
	7.	Allow your participation in surveys, questionnaires, market research and general statistical surveys offered by the Data Controller or third parties	Processing put into place with the prior consent of the data subject (Article 6(i)(a) of the GDPR)
	8.	To allow the Data Controller to respond to requests made by administrative, jurisdictional or public security authorities (by way of example, pursuant to Article 210 of the Italian Code of Civil Procedure and 248 of the Italian Code of Criminal Procedure)	Processing required to fulfil the legal obligations to which the Data Controller is subject (Article 6(i)(c) of the GDPR)
	9.	To allow the Data Controller to ascertain, exercise or defend its right in or out of court as regards any dispute (lodged by you, the Data Controller, by third parties or by jurisdictional or administrative authorities)	Processing necessary for the pursuit of the legitimate interests of the Data Controller (Article 6(i)(f) of the GDPR)
	10.	Evaluate your browsing experience on the site to update and improve it according to the resulting information	Processing necessary for the pursuit of the legitimate interests of the Data Controller (Article 6(i)(f) of the GDPR)
	11.	Allow the Data Controller or third parties appointed by the Data Controller to verify the proper navigation of users on the Site and/or the correctness of transactions carried out	Processing necessary for the pursuit of the legitimate interests of the Data Controller (Article 6(i)(f) of the GDPR)
	12.	Once the transaction on the Site is concluded, to send you communications and commercial information about news, promotions and offers related to the products or services involved in the transaction, or similar products and services	Processing necessary for the pursuit of the legitimate interests of the Data Controller (Article 6(i)(f) of the GDPR)
With specific reference to the processing purposes referred to in nos. 9, 10, 11, and 12, the following is specified:			
	Purposes	Legitimate interest pursued	
9.	To allow the Data Controller to ascertain, exercise or defend its right in or out of court as regards any dispute	The interest of the Data Controller to protect its rights in the event of dispute	
10.	To evaluate your browsing experience on the site to update and improve it according to the resulting information	Interest of the Data Controller to improve the Site in order to provide users with a better browsing experience	
11.	Allow the Data Controller or third parties appointed by the Data Controller to verify the proper navigation of users on the Site and/or the correctness of transactions carried out	Interest of the Data Controller to protect itself from fraud and malicious or negligent actions carried out by Site users	
12.	Once the transaction on the Site is concluded, to send you communications and commercial information about news, promotions and offers related to the products or services involved in the transaction, or similar products and services	Interest of the Data Controller to keep customers informed and updated as regards news on its products and services	
If you wish to have additional and more specific information about the assessment carried out by the Data Controller as regards the balance between the legitimate			

	interests pursued and the interests or fundamental rights and freedoms of the data subjects, you can contact the Data Controller at the addresses referred to in Section A.
E) Categories and recipients of personal data processed	<p>In order to fulfil the aforementioned purposes, your personal data will also be processed by third parties other than the Data Controller.</p> <p>These subjects will process your personal data both on behalf of the Data Controller (therefore, as Data Processors) and as independent data processors, upon a specific communication from the Data Controller.</p> <p>Namely, the following categories of recipients will process your personal data:</p> <ul style="list-style-type: none"> a) service providers necessary for the proper functioning of the Site and its functions/services (such as ICT service providers, hosting service providers, platform providers and IT applications); b) service providers required for carrying out transactions on the Site, and any related and consequent fulfilment (such as payment service providers and bank operators, shippers/couriers for the delivery of products sold); c) jurisdictional, administrative and/or public security authorities in accordance with the provisions of law, for purposes of ascertaining and prosecuting offences, the prevention and protection of risks or threats to safety and public order, as well as for any reason related to the protection of rights and freedoms of individuals; d) providers of communication and marketing services (such as communications agencies); e) subjects carrying out market research and statistical surveys. <p>In you wish to have detailed identification information of all of the recipients listed above by category, you can contact the Data Controller at the addresses referred to in Section A.</p>
F) Transfer of personal data outside the European Economic Area	<p>The Data Controller may process your personal data outside of the European Economic Area. Should one or more subjects in charge of processing activities as processors actually process personal data outside of the European Economic Area, the transfer will take place to third countries that ensure an adequate level of protection of the personal data of data subjects, on the basis of an adequacy decision made by the European Commission.</p> <p>In the event of transfers to countries outside of the European Economic Area that do not ensure an adequate level of protection of the personal data of data subjects, the transfer will only take place:</p> <ul style="list-style-type: none"> (i) following the adoption of appropriate or appropriate guarantees (such as the stipulation of data transfer agreements that include the standard contractual clauses approved by the European Commission); (ii) if such is necessary for the conclusion of a contract or the fulfilment of contractual obligations between you and the Data Controller. <p>In such event, the Data Controller will provide detailed information about the methods of transferring data to third countries upon your simple request, as well any appropriate or appropriate guarantees used and the means to obtain a copy of such data or the place in which they were made available.</p>
G) Retention period of processed data	<p>Your personal data will be retained for a variable period of time, depending on the type and purpose of the processing activity. At the end of the retention period, personal data will be deleted or irreversibly anonymised. The retention periods of personal data are indicated below:</p> <ul style="list-style-type: none"> a) data relating to commercial transactions carried out on the Site (including payment data) will be retained until the finalisation of any administrative, tax, or civil law obligation (such as the expiry date to exercise the right of withdrawal or contest payment). Billing data will be retained for 10 (ten) years; b) browsing data will be retained for the duration of your access to the Site and the retention periods provided for by the relative technologies in use, in relation to which you can view the Cookie disclosure on the Site; c) data relating to your registration in the Reserved Area will be retained until you request the cancellation of your account (or exercise any other right provided by current legislation); d) data and information relating to contact between you and the Data Controller will be retained until the processing and fulfilment of your requests; e) data relating to the sending of commercial communications relating to news,

	<p>initiatives and offers of the Data Controller on products/services already purchased will be retained until the exercise of the right of opposition of the data subject or the erasure of data processed (also by means of unsubscribing by means of the <i>unsubscribe link</i>);</p> <p>f) data relating to the sending of commercial communications (including from third-party business partners), market research and statistical surveys, carried out with the consent of the data subject. These they will be retained until the exercise of the right of opposition of the data subject or the erasure of data processed (also by means of unsubscribing by means of the <i>unsubscribe link</i>), and otherwise after 2 (two) years have elapsed since your last interaction with the Site.</p> <p>If personal data is be processed for specific purposes at the end of the aforementioned period (such as for the protection of the rights of the Data Controller as regards a dispute), they will be retained until the end of these purposes (such as when the dispute is settled).</p>
	<p>At the end of the retention periods as indicated above, your personal data will be deleted, or otherwise rendered unintelligible by the Data Controller.</p>
<p>H) Processing of personal data by means of automated decision-making processes</p>	<p>There is no provision for the processing your personal data by automated decision-making processes (including profiling pursuant to Article 22(1) and (4) of the GDPR).</p>
<p>I) Your rights regarding the processing of personal data</p>	<p>You have the right to ask the Data Controller to access your personal data, pursuant to Art. 15 of the GDPR.</p> <p>By exercising the right of access, you can request information as regards:</p> <ul style="list-style-type: none"> - the processing purpose; - the categories of personal data processed; - the recipients or categories of recipients to whom the personal data have been or will be communicated, in particular if such are recipients in third countries or international organisations; - where possible, the retention period of the personal data provided, or, where not possible, the criteria used to determine this period; - the existence of the right to request that the Data Controller rectify or erase personal data, limit the processing of personal data concerning you or oppose such processing; - the right to lodge a complaint with a supervisory authority, - all information available as regards the origin of personal data, if not provided by you, - the existence of an automated decision-making process, including profiling pursuant to Art. 22, paragraphs 1 and 4 of the GDPR; in such cases, significant information on the logic used as well as the importance and the expected consequences of such processing.
	<p>The following rights are also guaranteed:</p> <ul style="list-style-type: none"> a) the right to revoke your consent, pursuant to Art. 7(3) of the GDPR, without prejudice to the legitimacy of processing activities carried out before such revocation; b) the right to obtain the erasure of personal data by the Data Controller, or the integration of incomplete personal data, pursuant to Art. 16 of the GDPR; c) the right to obtain the erasure of personal data by the Data Controller, pursuant to Art. 17 of the GDPR. The exercise of this right may not be guaranteed by the Data Controller (or the Data Controller may only be able to partially meet such right) to the extent that the processing of personal data subject to erasure as request is provided for in compliance with legal obligations, or for the assessment, exercise or defence of a right in court; d) the right to obtain the limitation of processing from the Data Controller, pursuant to Art. 18 of the GDPR; e) the right to obtain the portability of personal data processed by the Data Controller following consent or on a contractual basis pursuant to Art. 6, paragraph 1(a) and (b) of the GDPR. If such right is exercised, it will be the responsibility of the Data Controller to provide all data concerning the data subject acquired upon its consent or in execution of a contractual obligation, in a structured and interoperable format. Where such is technically possible, said personal data may also be sent in the same

	<p>manner to third parties selected by you, as indicated with a specific request;</p> <p>f) the right to object to the processing of your personal data pursuant to Art. 21 of the GDPR, unless the Data Controller demonstrates, upon receipt such objection, the existence of binding legitimate reasons to proceed with the processing that prevail over your interests, rights and liberties, or for the assessment, exercise or defence of a right in court.</p>
	<p>The above requests must be addressed to the addresses referred to in Section A. The Data Controller will respond to requests without undue delay.</p> <p>With specific reference to the right to revoke consent, this can also be exercised by selecting the appropriate functions made available at the bottom of any communication of a commercial nature (or relating to the participation in market research or statistical surveys).</p>
	<p>If no reply or negative feedback is received, if it is not timely or unsatisfactory to your requests, or if you believe that the Data Controller processes your data in an illegitimate or non-transparent way, you can contact a supervisory authority.</p> <p>If you are either an Italian citizen, reside or work in Italy, or you believe that the alleged violation of the Data Controller with regard to the processing of your personal data has taken place in Italy, you can contact the Guarantor for the protection of personal data - www.garanteprivacy.it - to obtain the appropriate protection of your rights.</p> <p>If you are a citizen of another EU member state, reside or work in another EU member state, or you believe that the alleged violation of the Data Controller with regard to the processing of your personal data has taken place in another EU member state, you may consult the website of the European Data Protection Supervisor (https://secure.edps.europa.eu/) for more information about the competent supervisory authority.</p>
J) Changes and updates to the Disclosure	<p>Should this information be amended or supplemented, the Data Controller will make every reasonable effort to inform those affected (such as through specific communications for users registered in the Reserved Area, or through appropriate communications in the form of banners or similar tools on the Site homepage).</p> <p>We ask that you periodically check the section of the Site within which this information is contained, and view the most recent version of the Disclosure (whose entry into force is indicated in the epigraph).</p>