

PRIVACY POLICY

pursuant to Articles 13 of the GDPR

Marketing and newsletter

Why this document is important

This document is of interest to you because it informs you of how and why we process your personal data.

This information only concerns processing carried out for the purposes specified below.

This information does not replace any specific information you may be given when you use other services provided by the Data Controller.

This document may be updated over time, so please check back periodically!

Data controller

Eredia italia xxi sl, VAT: ESB22682587, Barcelona 08007 (ES), Passeig de Gràcia 53, àtic, 1°

 info@marafatto.com  www.marafatto.com

What are your rights?

Where provided by law, you have the right to access your data, request its rectification, and erasure. You also have the right to object to the processing of your data or request that its processing be restricted. You also have the right to data portability. Furthermore, you have the right to withdraw your consent to the Data Controller at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

In any case, if you have any questions or requests, please contact us; we'd be happy to hear from you!

As the Data Subject, you can exercise your rights and withdraw your consent by notifying us at the contact details indicated.

You can also file a complaint with the AEPD – Spanish Data Protection Agency (Agencia Española de Protección de Datos) for the protection of personal data or contact the judicial authority if you believe that the processing of your data is unlawful.

Why we can process your data (legal bases)

Any processing of personal data must be based on an appropriate legal basis.

Processing is lawful when:

contract: it is necessary to perform a contract to which the Data Subject is party or pre-contractual measures requested by the Data Subject

consent: the interested party expresses his/her consent in a free, specific, informed and unequivocal manner

legal obligation: it is necessary to fulfill a legal obligation to which the Data Controller is subject

legitimate interest: it is necessary to pursue the legitimate interest of the Data Controller or third parties

protection of vital interests: it is carried out to prevent serious and current dangers to the life of the interested party

public interest: it is necessary to carry out a task carried out in the public interest or in the exercise of official authority

Why we process your data (purpose)

Marketing and newsletter

If the interested party agrees, the Data Controller processes personal data for advertising and marketing purposes, consisting of communications/notifications on new features, content, products and services offered by it and its partners (such as those with whom it collaborates in the provision of services or sale of products).

Legal basis: consent

Consent is required for this purpose. You may withdraw your consent to data processing at any time by notifying us (opt-out). Failure to provide consent or subsequent withdrawal of consent will prevent us from providing any related activities and services.

Obligations related to what we do and complying with the law

The Data Controller processes the data to perform activities related and instrumental to the performance of the contractual or pre-contractual relationship with third parties (e.g., administrative, management, tax, and accounting obligations; managing correspondence; issuing estimates; receiving orders; arranging appointments; providing information on the status of the activity; managing payments and invoicing).

Legal basis: contract | legal obligation | legitimate interest

The Data Controller also processes the personal data of the Data Subjects to fulfill the legal obligations (such as administrative, accounting, and tax) to which it is subject, to protect its rights, and to enable the exercise of the functions of judicial authorities.

Legal basis: legal obligation

Providing data for this purpose is essential.

Processing for this purpose is based on legitimate interest and legal obligation, so your consent is not required.

What data do we process?

Personal data

We process personal data, that is, any information relating to an identified or identifiable natural person.

Your data is valuable: do not share data that is not necessary for your request, and do not share third-party data unless you have their consent to do so!

We may also become aware of your sensitive data that you voluntarily share with us (such as: health, genetic, or biometric data; trade union membership; political opinions; philosophical or religious beliefs; ethnic or racial origin; sexual life and orientation).

Examples of personal data we process:

identification data and contact details Name and surname; tax code; place and date of birth; nicknames; telephone number, email address, residence, domicile, abode, registered office; username and password to access the systems that the Data Controller makes available to the Data Subject (company devices; e-commerce and reserved areas; websites and apps)

Where we get your data (sources)

We process the data that you share directly with us (optionally, explicitly and voluntarily) using various channels (such as when you call or write to us, when you interact with our social profiles or when you use our website or app) and the data that you have made public.

We also process data present in public registers, lists, and other public sources (e.g., balance sheets and other information from the Company Register at the Chamber of Commerce; real estate deeds, mortgage registrations, and other so-called prejudicial documents; mass media and websites accessible to anyone).



Who we share your data with

We share data with internal members of our organization involved by virtue of their assigned tasks and specifically charged with processing (such as: subordinate and freelance workers; interns, volunteers, temporary workers; partners, investors, directors; consultants and collaborators).

We may share data with third parties, external to our organization, who help us carry out our work and achieve the indicated purposes. These parties operate as independent data controllers or as external data processors: contact us if you want to know who they are!

With the interested party's consent, the data may be disclosed.

Examples of data recipients

Public Administrations, Public Bodies and entities, including private ones, with functions of public importance, to the extent that the conditions established by the legislation are met

External consultants and professionals (such as lawyers, accountants, labor consultants and data processing centers, DPO, RSPP, freelancers, journalists, coaches) partners, directors, other persons with corporate functions; auditing firms

organizations of our business group or entities connected to the same central body to which we are connected

social networks and other digital platforms (such as systems for managing video conferences or file exchange)

entities that manage the operation of the website, app, and in general of the company's IT systems and telecommunications networks (e.g., web agencies; providers of cookies and other tracking tools; newsletter providers; software houses; web providers; hosting providers)

entities that provide communications assistance and consultancy (e.g., market research aimed at determining the level of satisfaction with the quality of services and the activities performed, telemarketing, etc.)

marketing agencies, communications agencies, copywriters, printers or other entities that provide services related to the communication and promotion of the company

How long we keep your data

We retain your data until you withdraw your consent (opt-out) or, in any case, until the indicated purposes are achieved.

Longer only if necessary to comply with legal obligations, fulfill orders given by Public Authorities, or pursue a legitimate interest (such as exercising or defending a right in court)

How we process your data

We adopt appropriate security measures to protect your data and carry out the processing required by law: collection, recording, organization, storage, consultation, processing, use, modification, selection, extraction, limitation, communication, deletion and destruction of data.

Transfer of data abroad

If necessary to achieve the indicated purposes, we may transfer your data to non-EU countries that guarantee a level of personal data protection deemed adequate by the European Commission, or in any case on the basis of other appropriate guarantees such as the Standard Contractual Clauses adopted by the European Commission.

Essential Glossary

Personal data: any information relating to an identified or identifiable natural person)

Diffusion: providing data to unspecified parties, in any form, including by making it available or consulting it. For example, posting a photo online or on a social network.

DPOData Protection Officer, whose duties also include that of intermediary between the Data Controller and the Data Subject)

Interested: natural person to whom the personal data refers)

Data controller: who determines the purposes and means of the processing)

Treatments: any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means.