

Customer newsletter Privacy Policy

This privacy policy is for those who agree or request to receive communications about FRIULAIR S.R.L. promotional, commercial and advertising products, events, initiatives or partnerships.

Under art. 13 of EU Regulation no. 2016/679, we provide the following information to inform the data subject about our data processing methods:

a) Data Controller identity and contact details

We inform you that your data will be processed by FRIULAIR S.r.l. as Data Controller. **The Data Controller can be contacted at the following email address:** privacy@friulair.com and at its registered office in via Cisis,36 - 33052 Cervignano del Friuli (UD).

b) Processing purposes and legal bases

Data is processed for the following purposes:

- direct marketing: sending our newsletter or other informative and promotional material on FRIULAIR S.R.L., activities, products and services, or surveys to improve the service ("Customer Satisfaction"). Communication may be made via automatic messages, email, SMS/MMS, fax, paper mail or operator phone call. The Data Controller collects a consent for the described marketing purposes under the General Measure of the Personal Data Protection Authority "Guidelines on promotional activities and countering spam" dated 4 July 2013. You may object to the processing of your data for the above marketing purposes, at any time, under the procedures set out in point f) of this policy;

The data processing legal basis is Article 6(1)(a) of the GDPR, i.e. consent.

The provision of personal data is optional, but failure to provide it would make it impossible for FRIULAIR S.R.L. to send you commercial communications.

c) Personal data recipients and any categories of recipients

Data is processed by those authorised under the responsibility of the Data Controller for the above purposes using manual and electronic tools, with organisational and processing logics that are strictly related to the objectives.

Data may be communicated to third parties who provide instrumental services such as information system and telecommunications networks management services, including email, newsletters and website management, third parties who work with the Data Controller for direct marketing. The parties belonging to the above categories will act as data processors or independent data controllers. The updated list of Data Processors is available at the Data Controller's registered office.

d) Transfer of data to third countries

The Data Controller will not transfer the data to a third country or international organisation.

e) Data retention period

Data is kept in paper or electronic format for the period necessary to achieve the purposes for which it was collected and under legal obligations. Data will be kept for the newsletter service duration until consent is withdrawn.

f) Data rights

The Customer has personal data access rights, if requirements are met, under Article 15 of EU Regulation 2016/679 and the rights provided for in Articles 16, 17, 18, 21 of EU Regulation 2016/679 to rectify, erase, limit processing and the right to object under Art. 12 of the EU Regulation 2016/679.

You may stop receiving newsletters at any time by selecting the "unsubscribe" option at the bottom of each newsletter you receive. You will no longer receive FRIULAIR S.R.L. newsletters from that point.

The data subject may exercise their rights by submitting a request by written communication to the email address: privacy@friulair.com. The data protection rights form is available on the following website: <https://www.garanteprivacy.it/HOME/MODULISTICA-E-SERVIZI-ONLINE>.

g) Complaint

If you believe that your personal data processing is violating the provisions of EU Regulation 2016/679, you have the right to complain to the Data Protection Authority (Garante Privacy).

Cervignano del Friuli, 11/10/2021

Legal Representative