

## PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA

### Dear Sir/Madam,

This Privacy Notice is prepared for the Data Subject in accordance with article 13 of Regulation (EU) 2016/679 (hereinafter "GDPR") on the protection of natural persons with regard to the processing of personal data.

### PERSONS INVOLVED IN PROCESSING



The Controller of your personal data is BRISACH DESIGN S.A.S, with registered office in 109 Impasse de Chavanne 69400 Arnas (France), who may be contacted at the following e-mail address [contact-dpo@brisach.com](mailto:contact-dpo@brisach.com).

The Data Controller has appointed a Data Protection Officer (DPO), who may be contacted by the Data Subject in writing at the following email address: [dpo@mcz.it](mailto:dpo@mcz.it).

### PURPOSES OF PROCESSING AND LEGAL BASIS



Your personal data will be processed for the following purposes:

1. to fulfil contractual and/or legal obligations of an administrative nature, in compliance with regulations, to reply to your specific requests, to provide technical assistance (under warranty and extended warranty) (hereinafter "Contractual Purposes");
2. to manage any litigation;
3. to use the contact information of the Customer (e-mail address, postal address) to send communications that aim to show how to clean and maintain the Controller's products (hereinafter "Technical/scientific purposes");
4. to use the contact information of the Customer (e-mail address, postal address) to carry out opinion and satisfaction surveys, to send them commercial communications on the Controller's products and services, and to send promotions or invitations to events in which BRISACH DESIGN S.A.S will take part ("Marketing Purposes").

The legal basis for the purposes of the processing is shown below.

Contractual Purposes	Fulfilment of contractual and/or legal obligations and legitimate interest
Management of disputes	Fulfilment of legal obligations and legitimate interest
Technical/scientific purposes	Legitimate interest
Marketing Purposes	Consent

### PERIOD OF RETENTION OF THE DATA



Your data will be retained for the time that is required to fulfil legal obligations. If no legal requirements exist, the Controller will retain the data for a time that is adequate for the fulfilment of the aforementioned purposes and that complies with the consent granted. In particular, the data will be processed in accordance with the following time criteria:

Contractual Purposes	For the period and in accordance with the limitation period of the rights arising from the relationship, without prejudice to further retention for the time required for the resolution (in any way) of any disputes that may have arisen.
----------------------	---

v. 1.0 of 19/05/2020

	BRISACH DESIGN S.A.S hereby declares that it will remove the profile under which you registered for the application within 5 years from when such application was last used.
Management of disputes	For the period set forth by law and in accordance with the limitation period of the rights arising from the relationship, without prejudice to further retention for the time required for the resolution (in any way) of any disputes that may have arisen.
Technical/scientific purposes	The controller will process your data for up to 5 years from the last time the App was used.
Marketing Purposes	Up to 24 months from the last communication sent. You may withdraw the consent you have granted at any time.

#### NATURE OF THE COMMUNICATION OF THE DATA AND CONSEQUENCES OF FAILURE TO PROVIDE IT



The communication of the data for Contractual Purposes and for dispute management purposes is necessary. Failure to provide them shall, therefore, make it impossible for the Controller to manage the contractual relationship correctly and to complete the registration to the App.

The communication of the data for Technical/scientific purposes is necessary to make it possible for the Controller to pursue the aforementioned legitimate interests and to provide you, via messages of a non-commercial nature, with information that helps you use your stove correctly. Your possible refusal, therefore, would make it impossible to pursue the aforementioned purposes. You will, however, have the right to withdraw from the service at any time.

The communication of the data for Marketing Purposes is optional and your possible refusal to provide said data and to grant the related consent shall make it impossible for the Controller to use your contact information to carry out opinion and satisfaction surveys, to send you commercial communications on the Controller's products or services, and to send promotions or invitations to events in which BRISACH DESIGN S.A.S will take part.

#### CATEGORIES OF RECIPIENTS



Solely for the aforementioned purposes, all data collected and processed may be disclosed to company employees who have been authorised to process it while carrying out their duties and in accordance with the profiles attributed thereto, as well as to the following categories of external

subjects:

- companies of the Group of undertakings to which the Controller belongs;
- banking institutions
- insurance companies, brokers, and any legal representatives indicated thereby
- retailers and service centres
- service and sales networks;
- software houses and web farms,
- consultancy firms,
- service professionals or companies, as well as Public and private bodies, also following inspections and checks.

Those among the subjects mentioned who process personal data on behalf of BRISACH DESIGN S.A.S shall be appointed data processors.

v. 1.0 of 19/05/2020

## TRANSFER OF DATA TO A THIRD COUNTRY AND/OR AN INTERNATIONAL ORGANISATION



The personal data will not be transferred to a third country or an international organisation.

## RIGHTS OF THE DATA SUBJECTS



You have the right (see articles 15-22 of the GDPR) to ask the Data Controller to grant access to your personal data and to correct it, if it is incorrect, to delete it or to restrict its processing, if the requirements are met, to object to their processing for legitimate interests pursued by the Data Controller, and to obtain the portability of the data that you have provided only if it is subject to processing based on consent or the contract.

You also have the right to withdraw the consent given for the processing purposes that require it, without prejudice to the lawfulness of the processing up to the withdrawal.

You also have the right to lodge a complaint with the competent supervisory authority, the Italian Data Protection Authority. You may exercise the aforementioned rights by contacting the company's privacy contact person by sending an e-mail to the address [contact-dpo@brisach.com](mailto:contact-dpo@brisach.com).