Privacy Policy Why this notice:

This page describes how the website is managed with regard to the processing of users' personal data. The processing is always based on principles of lawfulness and fairness in compliance with all applicable regulations in force (and therefore also in compliance with the principles of necessity, fairness, lawfulness, transparency and protection of confidentiality) and strictly for the purposes pursued. The personal data subject to processing will be handled by G&P Cosmetics Srl (hereinafter also referred to as the "Company"), also in consideration of technological innovations in such a way as to minimise, through appropriate preventive security measures, the risk of its destruction or loss, even accidental, of unauthorised access to the data or processing operations that are either illegal or incompatible with the purposes for which the data was collected. Data will only be processed to achieve the aims described in this privacy policy and in any other policies notified to users as their data is collected; the latter are invited to consult them for reference purposes.

The data will be processed in accordance with all applicable regulations and in compliance with **REGULATION (EU) 2016/679.**

The data may also be filed in databases, including computerised ones. This document also constitutes a policy that is also provided pursuant to Art. 13 of **REGULATION (EU) 2016/679** to those who interact with the web services of this website, in order to protect personal data.

The website in question is

http://www.gpcosmetics.it

corresponding to the home page of the website.

The information is solely provided for the website specifically referred to and not for any other websites the user may visit through links. They are independent data controllers.

This notice is also issued following Recommendation no. 2/2001 that the European authorities for the protection of personal data, acting in the Group established by Article 29 of Directive No. 95/46/EC, adopted on 17 May 2001. The purpose of which was to identify some minimum requirements for the collection of personal data online and, in particular, the manner, timing and nature of information disclosures that data controllers must provide to users when they connect to web pages, regardless of the purpose thereof. The server holding the personal data relating to the website is at Aruba Spa – Arezzo.

Besides the place where the server is located, data may be processed at the headquarters of the Company or at the headquarters of any data processors that may be appointed (as well as third parties that may receive data as independent data controllers and which are listed in this privacy policy or in the relevant policies of this website).

Please note that all data may always be processed to assert or defend a right of the company in the appropriate premises and in line with all the obligations provided for by law, a regulation or EU legislation. Bear in mind that in this sense the provision is an essential requirement and failure to provide the data will make it impossible to access the website and/or establish any relationship with the company (even by simply writing an e-mail to request information) and that for these purposes the data may be communicated to judicial bodies or the police, lawyers and anyone else necessary to fulfil obligations provided for by law, a regulation or EU legislation or to assert or defend a right in the appropriate premises. Please read all the specific information there may be in the various sections of the website.

Type of data processed and processing procedures *Navigation data*

During their normal operation, computer systems and software procedures used to operate this website acquire certain personal data the transmission of which is implicit in the use of internet communication protocols.

These data are not collected to be associated with identified data subjects, but by their very nature could allow users to be identified through processing and association with data held by third parties.

This category of data includes the IP addresses or domain names of the computers of users connecting to the website, the URI (Uniform Resource Identifier) addresses of the requested resources, the time of the request, the method used to send the request to the server, the size of the file obtained in response, the numerical code indicating the status of the server response (successful, error, etc.) and other parameters relating to the user's operating system and IT environment. This data is used by the company for the sole purpose of obtaining anonymous statistical information on the

use of the website and to check its correct operation and is deleted immediately being processed.Data may be used to ascertain any liability in the event of IT offences against the website or more in general against the company.

The data may be processed on paper media, manually, with computer-based media and digitally (which means that the Company stores and processes the data both on paper and computerised media). The provision of said data is optional (except in the case of a request by judicial bodies or the police, in which case the provision is necessary) but if it is not provided, it will not be possible to browse the website.

Cookies

See the relevant <u>Cookie policy</u> page

Data provided voluntarily by the user

With regard to specific contributions for which there is a specific form, please refer to these forms and to the specific information.

The optional, explicit and voluntary transmission of e-mails to the addresses indicated on this website (in the event that only the e-mail address is indicated and there is no special compilation form referring to specific information governing the provision in the various forms), will involve the Company in the subsequent acquisition of the sender's address required to respond to requests, as well as any other personal data included in the message (and in its attachments) or in the appropriate forms In this case (the one in which only the address is indicated and there is no specific compilation form referring to the specific information that governs the provision in the various forms) the provision of data is optional, but failure to provide the address or other data necessary to process the request will make it impossible to process the request itself. By sending the e-mail, the party concerned explicitly consents to the processing of the data to process the requests. In the event of requests to send material, the data necessary for the shipment may be transmitted to postal services and couriers. The data, in a paper or electronic format, may be processed both manually and by means of computerbased/digital media by filing the data in computer-based databases as well. The data will be kept for the period necessary to pursue the indicated purposes.

Data Controller and Data Protection Officer

The data controller is **G&P COSMETICS SRL**, with registered office in via L. Mascheroni 27 – 20145 Milano (MI-Italia), Tax Code, VAT No. and Milan Companies' Register No. 04778640963, MI EAI 1771789, Share Capital € 62,500.00 fully paid up, a company subject to the direction and coordination of AGF88 Holding S.r.l., Telephone: +39.0575.720.682 Email: info@qpcosmetics.it.

Rights

We hereby inform you that under the GDPR, the Data Controller can request from the company (at the above addresses) access to personal data, its correction, cancellation or the limitation of the processing that concerns them, as well as data portability; the data subject may also object to the processing of data and exercise the other rights contained in chapter 3, section 1 of the GDPR, including the right to withdraw their consent, where provided for: withdrawing your consent does not affect the lawfulness of the processing based on the consent given before the withdrawal.

Complaints:

If they believe that the processing concerning them violates the provisions of the GDPR and privacy regulations, users can always file a complaint with the Italian Data Protection Authority whose contact details can be found at <u>www.garanteprivacy.it</u>.

Legal basis

The legal basis is constituted by legal obligations (Italian and European laws) and consent where required, as well as by the legitimate interests of the owner in the relationship with the user.

Scope of disclosure and dissemination

No data will be disclosed by the Company

With regard to specific processing for which there is a specific form on the website or a specific section in please refer these forms and the specific sections. this policy, to to For other processing, the data provided by users may be known (and processed on behalf of the Company) by persons specifically delegated by the company (IT technicians including contractors, consultants including contractors - legal consultants, IT technicians, consultants in charge of managing the website - marketing agents including contractors, employees of the sectors to which a potential request may be addressed) and data processors (for example companies that manage the website or where the site resides, as well as outsourcers who provide assistance to corporate management such as the parent company) appointed pursuant to law by the company. The list of data processors can be found by contacting the data controller. All the above subjects only process the data strictly required to perform their tasks.

If necessary and as specified also at the beginning of this policy, the data may also be communicated by the company to judicial bodies or the police, lawyers and anyone else necessary to comply with obligations provided for by law, a regulation or EU legislation or to assert or defend a right in the appropriate premises.

Option	to	provide	data	and	processing	procedures
Option		provide	uutu	unu	processing	procedures

For complete information on the processing of data by the company, please read all the information in the various data request areas and all the sections of this privacy policy.

Retention time

For navigation data and cookies, please refer to the appropriate sections of this policy.

For the data provided in the forms, please refer to the appropriate sections.

The data necessary to respond to specific requests may be retained until the request is fulfilled, unless further retention is required by current Italian and European regulations;

- in the case of legal obligations, regulations and EU standards, the data may be stored for the periods imposed by these regulatory sources;

- in any case, under Italian and European regulations all data can be stored for a period necessary to assert or defend a company right.

Specific information

As already reported, this website includes other specific brief privacy policies in pages for services available upon request. Please also refer to these policies that complement this policy.

Last updated on 07/07/2022